CityPlan2040

Evidence Report

June 2026

EDINBVRGH
THE CITY OF EDINBURGH COUNCIL

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Introduction and Guide to the Evidence Report

What is the Evidence Report?

The Evidence Report has been prepared by City of Edinburgh Council Planning Authority as the formal step required towards review of City Plan 2030, the Council's Local Development Plan (LDP), adopted November 2024, to provide the basis for City Plan 2040.

It fulfils the Council's statutory duty to gather evidence on key themes affecting the area and to use this to review spatial planning, policies and proposals. Section 16(B) of The Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019) requires planning authorities to prepare an Evidence Report that has sufficient information from which to prepare their LDP.

The Evidence Report lists and summarises the evidence, setting out what critical evidence needs to be considered for the next Proposed Plan and what the implications are as a result.

The Evidence Report is prepared in the context of the Planning (Scotland) Act 2019 and National Planning Framework 4 (NPF4), the Scottish Government's local development planning guidance, the Planning and Environmental Appeals Division (DPEA)'s guidance and subsequent guidance notes from both the Government and DPEA.

The latest Development Plan Scheme (DPS) and Participation Statement published in September 2025 sets out the timeline for the stages of plan preparation and in the submission of this Evidence Report that timeline is met. The DPS will be reviewed once the outcome of the Gate Check of the Evidence Report is known.

The Evidence Report has been informed by:

- technical data
- topic evidence sources as set out in legislation and guidance
- national, regional and local strategies, plans and policies
- new technical studies
- cross service working with Council services to align with adopted strategies, their objectives and land use requirements and to support established and updated data sources
- key agency and other stakeholder engagement to scope, sense check and agree on the sufficiency of evidence
- public engagement including children and young people and other prescribed groups to understand lived experience of places
- community council and elected member engagement to scope and sense check place-based considerations
- working with communities to support Local Place Plans
- review of LDP 2016 and City Plan 2030.

The Evidence Report gives due regard to registered Local Place Plans (LPP) in the area (see engagement summary) and may be a resource for communities in future LPP preparation as well as informing other strategies and plans of the Council.

Political engagement has been integral to the process through Leadership Forum (political group planning leads) meetings and briefings to ensure Member understanding of the process and the potential considerations for the Proposed Plan.

City Plan 2030 remains the adopted LDP for the City of Edinburgh Council area and the submission of the Evidence Report does not change that or its role in the Development Plan as the primary material consideration for making decisions on planning applications along with NPF4.

Overview of Topic Papers and Place Profiles

The evidence baseline is detailed in the 26 Topic Papers and 17 Place Profiles which make up the main body of the Evidence Report and reflect the relevant themes and policies of NPF4 as well as the statutory requirements for an evidence report.

They set out the implications of the evidence for what will need to be considered for the Proposed Plan. Strategy, proposal and policy details are not in the remit of the Evidence Report stage, other than to set an Indicative Local Housing Land Requirement. The key strategic implications are summarised in this section of the Evidence Report. More details of the implications are set out in the Topic Papers and Place Profiles.

The Topic Papers use the recommended government template to present an Edinburgh wide evidence baseline to inform the Proposed Plan process. More details are set out in the guide to the Evidence Report.

The Place Profiles template provides information on the people, infrastructure and key features of each ward with a summary of the strengths, weaknesses and implications.

The definition of topics derives from NPF4 taking infrastructure first and then considering climate and nature crises issues then moving on to housing and place-based policy considerations.

The Topic Papers are informed by updated technical studies on economic needs, landscape and green belt, habitat surveys, housing need, strategic flood risk 2022 census outputs and by stakeholders including the key agencies, development organisations and others. All supporting documents can be viewed online. The Topic Papers list primary evidence sources and function as primary evidence sources in themselves.

The Place Profiles distil evidence for the city area into constituent wards, informed by wider place based public engagement and adding a place-based insight to data and evidence.

A review of both City Plan 2030 and the 2016 LDP has been undertaken to evaluate delivery of their outcomes, allocations and spatial strategy. This work also informs the evidence base.

Topic paper list

The topics, relation to NPF4 policies and general content are set out in the table below.

Evidence Report Topic Papers	NPF4 Themes and Policies Sustainable Places, Liveable Places, Productive Places	Content/ Scope of Evidence
01a. Infrastructure - transport	1. Tackling the climate and nature crises 2. Climate mitigation and adaptation 13. Sustainable transport 14. Design, quality and place 15. Local living and 20 minute neighbourhoods 18. Infrastructure first	• Infrastructure capacity and availability in Edinburgh • Active travel walking, wheeling and cycling) • Public transport (bus, tram, rail) • Taxis and shared transport • Road network • Car parking • Electric vehicles • Road safety • Environmental factors • Freight • Canals • Edinburgh Airport • Transport poverty • Disused rail • Economic impact • Green Freeport
01b. Infrastructure - education	18. Infrastructure first	• School capacities, projections, catchments, condition • Special schools and additional needs • Further and higher education
01c. Infrastructure - health and social care	18. Infrastructure first 23. Health and safety	• Primary health care infrastructure and capacity • Implications of population growth and future health care infrastructure needs • Public conveniences and water refill locations
01d. Infrastructure -	18. Infrastructure first	• Energy infrastructure including electricity and gas grids

energy and digital infrastructure	24. Digital infrastructure	• Digital infrastructure including mobile and broadband
01e. Infrastructure - water and waste water	18. Infrastructure first	• Waste water treatment • Mains water supply • Resilience to drought and climate change
01f. Infrastructure - pipelines and hazards	11. Energy 18. Infrastructure first 23. Health and safety	• Pipelines and major hazards • Contaminated land • Safeguards
01g. Infrastructure - cemeteries, crematoriums and mortuaries	4. Natural Places 7. Historic assets and places 15. Local Living and 20 minute neighbourhoods 18. Infrastructure first 22. Flood risk and water management	• Cemetery, crematoria and mortuary provision, capacity and demand
01h. Infrastructure - minerals, coal and peat	5. Soils 8. Green belts 12. Zero waste 18. Infrastructure first 23. Health and safety 33. Minerals	• Minerals and aggregates sources • Extent of 10 year supply • Coal and peat
02. Natural places	1. Tackling the climate and nature crises 4. Natural places 5. Soils 6. Forestry, Woodland and Trees	• Protected Areas – international, national, regional and local • Environmental assessment • Forestry, woodland and trees • Soils

03. Green belt, countryside and rural	2. Climate mitigation and adaptation 3. Biodiversity 8. Green belts 17. Rural homes 29. Rural development	• Review of existing green belt and countryside • Landscape character
04. Water management, flood risk and coastal development	10. Coastal development 20. Blue and green infrastructure 22. Flood risk and water management	• Flood risk • Strategic flow paths and water management • Water quality • Coastal change
05. Biodiversity	1. Tackling the climate and nature crises 3. Biodiversity 9. Brownfield, vacant and derelict land and empty buildings	• Species • Habitats • Nature network • Securing positive effects for biodiversity
06. Green blue infrastructure, open space and recreation	20. Blue and green infrastructure 21. Play, recreation and sport	• Legislation • Strategic Context • Species • Habitats • Nature Network • Securing Positive Effects for Biodiversity
07. Zero waste, energy, heating and cooling	11. Energy 12. Zero waste 19. Heating and cooling	• Heating and cooling • Energy • Zero waste
08. and 09. Climate change and mitigation	2. Climate mitigation and adaptation	• Climate change impacts facing Edinburgh • Climate resilience • Greenhouse gas emissions and mitigation • Climate change risks and adaptation

10. Historic assets and places	7. Historic assets and places	• Historic environment • Designations • Sustaining heritage assets and places
11. Design, quality and placemaking	14. Design, quality and place	• Urban design and place based approach
12. Housing land	9. Brownfield, vacant and derelict land and empty buildings 16. Quality homes 17. Rural homes	• Affordable housing • Housing need and demand • Housing land • Site appraisal methodology • Indicative Local Housing Land Requirement
13. Specialist housing and other accommodation	16. Quality Homes	• Demographics • Housing needs of older and disabled people • Care homes • Specialist groups • Homes for larger families • Build to rent • Houses in multiple occupancy • Housing needs of Gypsy/Traveller and Travelling Showpeople
14. Student accommodation	16. Quality Homes	• Edinburgh's further and higher education institutions • Students numbers • Student accommodation • Cost and affordability • Term time accommodation • Current and future need
15. Local living	15. Local living and 20 minute neighbourhoods	• Edinburgh 20-minute neighbourhood strategy • Local living framework • Place-based approach
16. Health and wellbeing	15. Local living and 20 minute neighbourhoods 23. Health and safety	• Health and wellbeing statistics, indicators and inequalities • Access to healthy food and clustering of unhealthy uses • Access to food growing spaces Noise

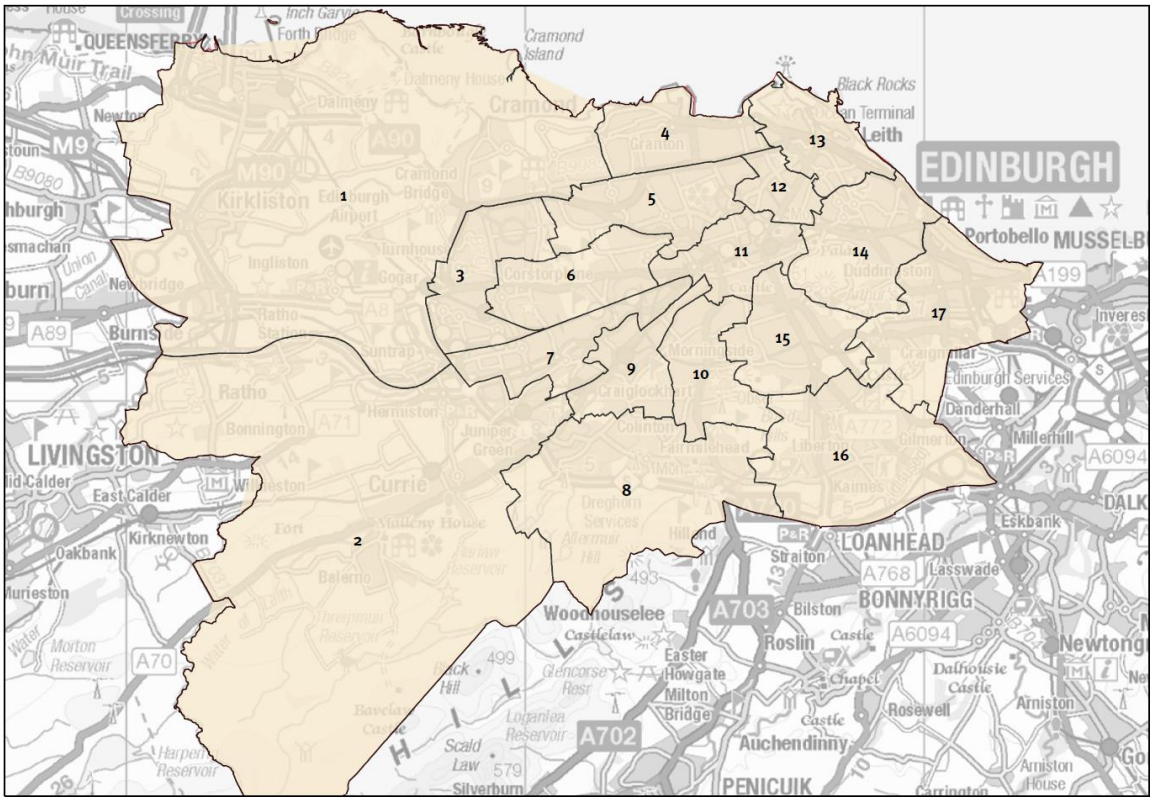
		• Air quality • Proximity to health infrastructure
17. Community wealth building	25. Community wealth building	• Community asset transfers • Economic needs study • Local Place Plans • Place Profiles
18. Economy, business and industry	26. Business and industry	• Economic activity and sectors • Employment land • Economic profile • Analysis of employment land and demand • Calculating future employment land requirements
19. City, town, local and commercial centres	27. City, town and commercial centres 28. Retail	• Network of centres – city, town, local and commercial centres • Retailing • Use/function and performance of network of centres • Drive-through locations • City and town centre living • Local living
20. Tourism, culture and creativity	30. Tourism 31. Culture and creativity	• Key statistics (visitor profile and economic impact) • Needs of communities and visitors (attractions, accommodation and infrastructure) • Tourism pressure and challenges • Cultural experiences and heritage • Culture and creativity infrastructure

Place Profiles

From the local development planning guidance, there is an expectation that LDPs have a clear focus on place and 'tell a clear and compelling story about the future of places' and 'meets the needs and aspirations of the different people who have an interest in a place'. Edinburgh is not just one place; it is a series of different places with their own challenges.

Place Profiles have been produced for each of the Council's 17 wards, shown in the map and listed in the table below, as a logical way to break-down the city into separate areas. The Place Profiles combine quantitative data with qualitative information from place-based engagement to provide an understanding of that place, what it is like to live there and what might need to be addressed through the Proposed Plan.

The Place Profiles give important context for a place-based plan.



Edinburgh's Wards	
Ward 1 Almond	Ward 10 Morningside
Ward 2 Pentland Hills	Ward 11 City Centre
Ward 3 Drum Brae / Gyle	Ward 12 Leith Walk
Ward 4 Forth	Ward 13 Leith
Ward 5 Inverleith	Ward 14 Craigentinny / Duddingston
Ward 6 Corstorphine / Murrayfield	Ward 15 Southside / Newington
Ward 7 Sighthill / Gorgie	Ward 16 Liberton / Gilmerton
Ward 8 Colinton / Fairmilehead	Ward 17 Portobello / Craigmillar
Ward 9 Fountainbridge / Craiglockhart	

Legislative compliance

The Evidence Report addresses legislative requirements under the relevant sections of the 1997 Act as set out below:

Statutory Requirements - Town and Country Planning (Scotland) Act 1997	**Compliance with Statutory Requirements – Evidence Report References Section**
16B(2)	
Seek, and have regard to, views expressed by: The key agencies Children and young people The public at large	Compliance with this requirement is detailed in the Engagement Report with the feedback received referenced in the Engagement Report, Place Profiles and relevant Topic Papers.
Section 16B(4)	
Include a statement on the steps taken by the planning authority in preparing the report to seek the views of the public at large, including in particular the views of: Disabled persons; Gypsies and Travellers; children and young people; community councils, and The extent to which the views expressed under paragraphs (a) and (b) have been taken into account in the report.	A detailed account of the steps taken to gather input from the prescribed persons is provided in the Engagement Report. Summaries of these steps, along with how the feedback has been considered, are included in the Engagement Report, Place Profiles and relevant Topic Papers.
Section 16B(3)(a) (as it relates to Section15(5)), the planning authority's view on -	
The principal physical, cultural, economic, social, built heritage and environmental characteristics of the district.	Information on these characteristics is provided within each of the individual Topic Papers. Further information is contained within the Place Profiles
The principal purposes for which the land is used.	Information on this matter is provided within each of the individual Topic Papers. Further information is contained within the Place Profiles
The size, composition, health and distribution of the population of the district.	Information on the demographics and health of the population of the Edinburgh LDP area is principally addressed in the Topics Papers. Further information is contained within the Place Profiles
The housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people	This matter is principally addressed in Topic 12 Housing land, Topic 13 Specialist housing and other accommodation and Topic 14 Student accommodation
The availability of land in the district for housing, including for older people and disabled people.	This matter is addressed in Topic 12 Housing land, Topic 13 Specialist

	housing and other accommodation, Topic 14 Student accommodation and Topic 01c Infrastructure - health and social care.
The desirability of allocating land for the purposes of resettlement	This is not within scope
The health needs of the population of the district and the likely effects of development and use of land on those health needs.	These matters are principally addressed in Topic 01c Infrastructure - health and social care, Topic 16 Health and wellbeing and the Place Profiles
The education needs of the population of the district and the likely effects of development and use of land on those education needs.	These matters are addressed in Topic 01b Infrastructure - education
The extent to which there are rural areas within the district in relation to which there has been a substantial decline in population.	This is not within scope
The capacity of education services in the district.	This matter is addressed in in Topic 01b Infrastructure - education
The desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular, but not limited to, live music venues) in the district.	This matter is principally addressed in Topic 20 Tourism, culture and creativity and the Place Profiles.
The infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy (include in particular land available for the development and use of facilities for renewable sources of energy), and health care and education facilities), and how that infrastructure is used.	These matters are addressed in Topics Topic 01a Infrastructure – transport, Topic 01b Infrastructure – education, Topic 01c Infrastructure - health and social care, Topic 01d Infrastructure - energy and digital infrastructure, Topic 01e Infrastructure - water and waste water, Topic 07 Zero waste, energy, heating and cooling.
Any change which the planning authority think may occur in relation to any of the matters mentioned above.	These matters are covered in the individual Topic Papers and summarised below.
Section 16B(3)(a), the evidence report is to set out -	
A summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, and an analysis of the extent to which	These matters are discussed Topic 12 Housing land, Topic 13 Specialist housing and other accommodation, and Topic 01c Infrastructure - health and social care.

the action has helped to meet those needs.	
Section 16B(3)(c), the evidence report is to set out -	
A summary of the action taken by the planning authority to meet the accommodation needs of Gypsies and Travellers in the authority's area, and an analysis of the extent to which the action has helped to meet those needs.	These matters are discussed in Topic 13 Specialist housing and other accommodation.
Section 16B(3)(d), the evidence report is to set out -	
How the planning authority have invited local communities in their district to prepare local place plans in accordance with schedule 19, and the assistance provided to local communities to assist them to prepare local place plans.	These matters are addressed in the Engagement Report of this Evidence Report.
Section 16D	
A planning authority must assess the sufficiency of play opportunities in its area for children in preparing an evidence report.	The Play Sufficiency Assessment (PSA) is addressed in Topic 06 Green blue infrastructure, open space and recreation. The PSA is a supporting paper.

Environmental Appraisals

Draft Strategic Environmental Assessment (SEA) Scoping Report	The SEA Scoping Report gives an overview of the SEA process for the next LDP, setting out how the plan will be assessed through its stages, in compliance with the Environmental Assessment (Scotland) Act 2005.
Habitats Regulations Appraisal	Habitats Regulations Appraisal (HRA) is required for later stages of the Plan. Due to the nature of the HRA regulations and process of assessment, it cannot be carried out for the Evidence Report stage.

Evidence gaps

While the Council is confident in the sufficiency of the evidence gathered, some gaps remain due to data availability and stakeholder capacity. The LDP process and its timescales mean it is not always possible to fully coordinate all data and information. The current evidence gaps to be resolved for the Proposed Plan are:

- Open Space Strategy – a review of existing open space is underway and it is expected that the new Open Space Strategy will be complete by early 2027
- Forestry and Woodland Strategy – the draft strategy is being prepared and will be published for consultation in September 2026
- NHS Lothian GP Practice condition survey - the Council continues to work with the NHS to prepare this.

Also, some data will be reviewed in the course of the process leading to the Proposed Plan stage, where these are generally reviewed annually, such as education projections, homelessness figures, housing land audits, Biodiversity Duty Report etc. These are detailed in the relevant Topic Papers. For these, further consideration will be given to updated data and projections as they emerge, feeding into relevant appraisals along with strategy, site and policy proposals in the Proposed Plan.

Some matters raised cover policy development and are therefore defined as points of consideration for the Proposed Plan process rather than disputes. As such, they sit as considerations in the Topic Papers.

There is dispute by Homes for Scotland as a stakeholder, it considers higher figures for household projections and the indicative LHLR, as detailed in Topic Paper 12 Housing land.

Matters out of scope

The following matters are not in consideration as not relevant to the city's administrative area.

Regarding aquaculture, the Business and Industry paper of the Economic Needs Study states that in Edinburgh, this important sector is primarily concentrated on research and supporting administrative functions. As a result, any requirements are likely to be met by class 4 office space. Major aquaculture facilities tend to be located in Scotland on the west coast and the islands and are not associated with a largely urban area such as Edinburgh.

Marine planning may provide further relevant information which is relevant to coastal planning. LDP guidance also advises that Scottish Coastal Observatory Data may be of assistance, but this data is not referred to in this topic paper given the coastal monitoring data sites are distant from the City of Edinburgh Council area.

There is no consideration of historic battlefields. The inventory of historic battlefields was established in 2011 and there are no inventory historic battlefields designated in the council area.

There is no consideration of rural housing. NPF4 states that LDPs should set out tailored approaches to rural housing and where relevant include proposals for future population growth – including provision for small-scale housing such as crofts and woodland crofts and the appropriate resettlement of previously inhabited areas. In terms of the Scottish Government's 6-fold Urban Rural Classification, outwith the Council's urban area, the surrounding countryside is defined as 'Accessible Rural' i.e. within a 30 minute drive from the centre of a settlement with a population of 10,000 or more. There are no areas classified as 'Remote Rural' with the council area.

Engagement Summary

This provides a high-level summary of the Council's approach to consultation and engagement in preparing the Evidence Report for City Plan 2040. It builds upon the Participation Statement contained within the Development Plan Scheme. A full commentary, detail, and summary of the engagement findings are detailed in the separate Engagement Report.

The work on engagement and consultation forms part of the evidence base itself feeding into the Evidence Report.

The Council recognises that effective engagement is an essential part of the local development plan process and preparing the Evidence Report is a key stage where it is important to involve communities and, in accordance with the requirements in the Town and Country Planning Scotland Act 2019, seek the views of:

- children and young people
- the public at large
- disabled people
- Gypsies and Travellers
- community councils
- key agencies; and
- other persons prescribed

In addition, the Council acknowledges that engagement and collaboration is required for supporting documents such as the Economic Needs Assessment, Open Space Strategy, Play Sufficiency Assessment and Forestry and Woodland Strategy. Where provided for the Evidence Report, these outline the engagement that has been undertaken.

A meeting and engagement record has been kept of the consultation and engagement that has been carried out including meetings, mail-outs, correspondence and events.

Stakeholders

The table below provides a high-level summary of how stakeholders have been involved in preparing the Evidence Report, with the Engagement Report providing more detailed information on the issues raised and implications for the Proposed Plan. This has captured qualitative evidence particularly about where people live, their issues and aspirations.

Stakeholder	Summary of how consulted
Children and young people	Place and Play questionnaire circulated to all primary schools and secondary schools and home school network. In-person workshops and events targeting those with children and young people with protected characteristics.
The public at large	Place questionnaire based on Place Standard tool promoted across the city. Drop-in events in different locations across the city.
Disabled people	Place questionnaire based on Place Standard tool provided in a range of formats and specifically promote to target disability groups. Accessible drop-in events in different locations across the city. Contacted representative groups and offered opportunity to discuss needs
Gypsies and travellers	Face to face discussions with members of the gypsy and traveller communities. Engagement with MECOPP and Lothian Gypsy/Roma Forum. The Showmen's Guild is a stakeholder for preparation of the Evidence Report and it was offered the opportunity to feed into the topic papers.
Community Councils	Invitation to prepare Local Place Plans. Attendance at Community Council meetings. Place questionnaire based on Place Standard tool promoted to Community Councils. Engagement on Place Profiles.

Local Place Plans

Local Place Plans are a means for community bodies to be involved in the preparation of the local development plan. They offer the opportunity to empower communities as they can set out their own proposals for the development and use of land within their local area. Registered Local Place Plans have been reflected in the Evidence Report through the Place Profiles and will be taken into account in the preparation of the Proposed Plan.

At present, there are three registered Local Place Plans: Wester Hailes, Midmar Paddock and Astley Ainslie with further Local Place Plans expected to inform the preparation of the Proposed Plan.

The Engagement Report outlines how the Council invited communities to prepare a Local Place Plan and the assistance provided to community bodies.

Key Agencies

Section 16(B)(2) states that in preparing the Evidence Report, the planning authority is to seek the views of and have regard to any views expressed by the Key Agencies, specified in Regulation 25.

For Edinburgh, the Key Agencies are the following:

- Historic Environment Scotland (HES)
- National Health Service Lothian (NHS Lothian)
- Nature Scot
- Scottish Environmental Protection Agency (SEPA)
- Scottish Water
- Scottish Enterprise
- South East Scotland Transport Partnership (SEStran)

There are also other organisations that support the planning system and/or are part of the Key Agencies Group:

- Architecture and Design Scotland (A&DS)
- Forestry Scotland
- Marine Scotland
- SportScotland
- Transport Scotland
- Visit Scotland

In addition, there has been consultation and engagement with a range of other stakeholders including Council services, public bodies, development interests, business and tourism groups, transport organisations, further and higher education institutions, infrastructure providers and landowners in the Evidence Report. These are listed in the Engagement Report.

The table below summaries the involvement of Key Agencies and other Key Agency Group organisations in the different stages of the Evidence Report process including Homes for Scotland as the representative of the housing industry.

	Key Agency/ Stakeholders	Scoping stage Comment made	1st Draft Comment made	2nd Draft Comment made	Meeting held	Final Agreement
Key Agencies	HES	✓	×	✓		Evidence sufficient
	NHS Lothian	✓	✓	✓	✓	Evidence sufficient
	Nature Scot	✓	×	✓	✓	Evidence sufficient
	SEPA	✓	✓	✓	✓	Evidence sufficient
	Scottish Water	×	✓	✓	✓	Evidence sufficient
	Scottish Enterprise	✓	×	✓		Evidence sufficient
	SEStran	✓	✓	✓		Evidence sufficient
Scottish Government Agencies	Transport Scotland	×	✓	✓	✓	Evidence sufficient
	Scottish Forestry	✓	✓	×		Assumed sufficient
	Marine Scotland	✓	✓	✓		Evidence sufficient
Other organisations in Key Agency Group	A&DS	×	×	×		No response
	Sport Scotland	✓	✓	×		Assumed sufficient
	Visit Scotland	×	×	×		No response
	BGS	✓	✓	×		Evidence sufficient
Industry body	Homes for Scotland	✓	✓	✓	✓	Evidence disputed

Each Topic Paper provides a summary statement outlining how key agencies and stakeholders have been engaged, summarising their views and identifying any outstanding disputes.

Edinburgh overview

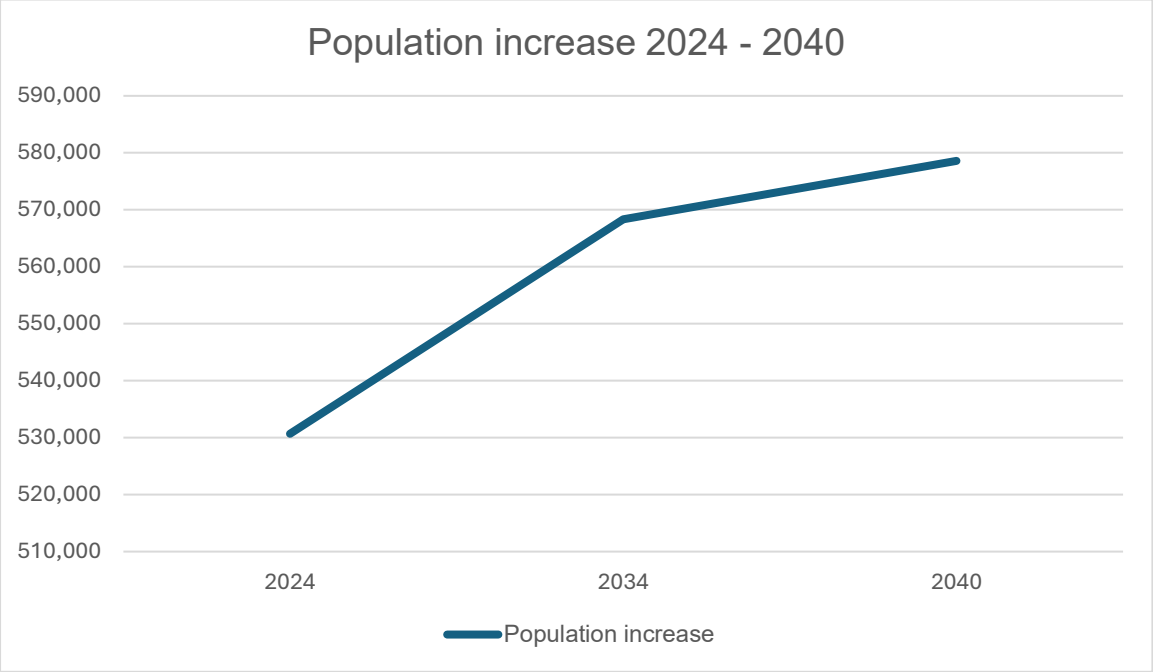
The evidence demonstrates that Edinburgh continues to be a successful city with population, economic and investment growth pressures. That needs consideration of how growth can be delivered in a relatively compact city with competing land uses, infrastructure stresses, high housing costs, levels of inequality and poverty and an environment characterised by a wealth of built and natural heritage assets.

The Topic Papers consider these pressures in the detail of evidence and range of implications for the Proposed Plan and how the city continues to work as a place overall but will also assess how different areas of the city are working including smaller settlements to the west of the main urban area and areas of deprivation.

Key figures are set out below. Further detailed statistics are provided in Topic Papers 12 Housing land and 13 Specialist housing and other accommodation needs).

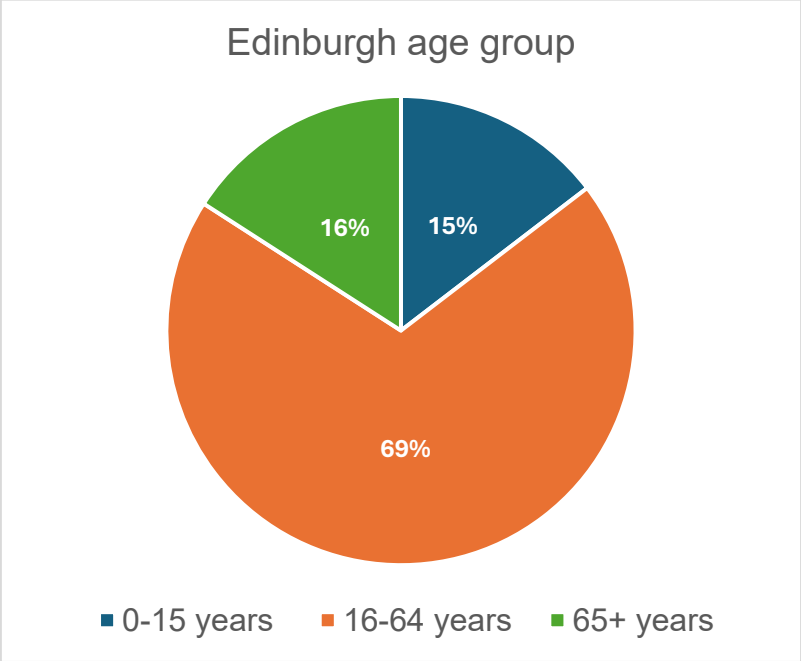
Edinburgh overview in charts

Edinburgh's population is projected to continue to increase over the period the City Plan 2040 will cover.



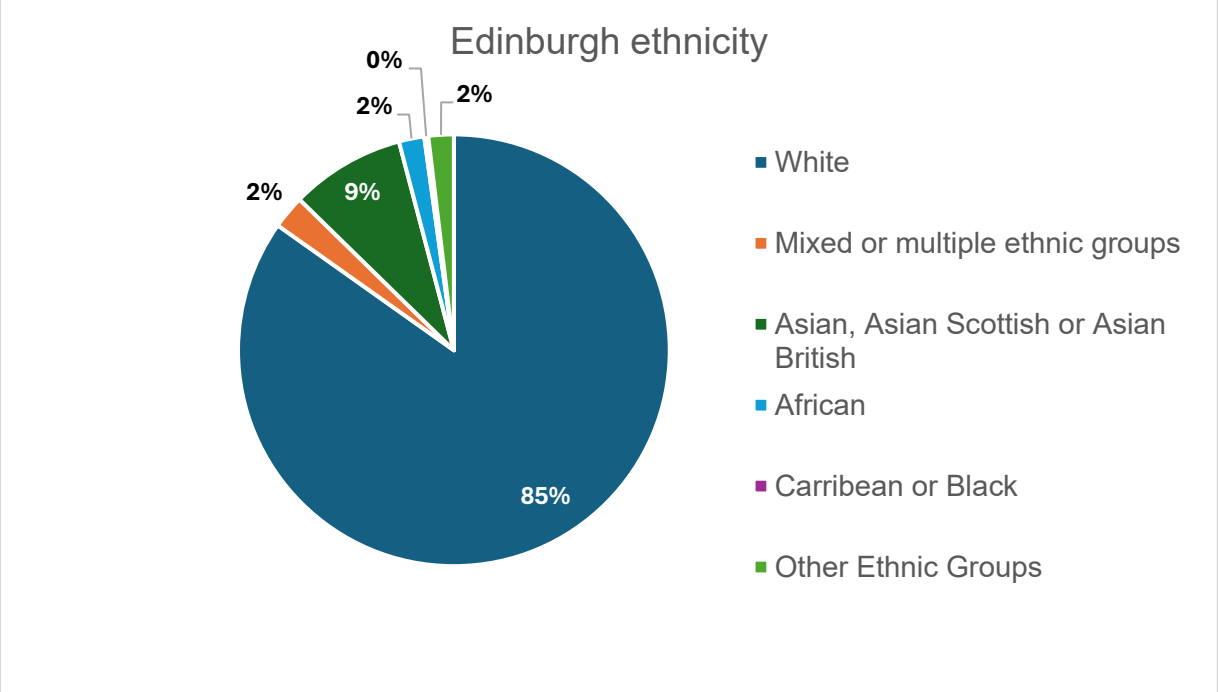
(source: NRS population projections, 2022 based)

Nearly 70% of the population is in the 16-64 age group. The over 65 age group has increased by nearly 16% and is predicted to increase in proportion over time,



(source: NRS population projections, 2022 based)

In the city almost 85% of the population identifies as white ethnicity, with others identifying as in the chart below. Further details are given in the Place Profiles.



(source: NRS population projections, 2022 based)

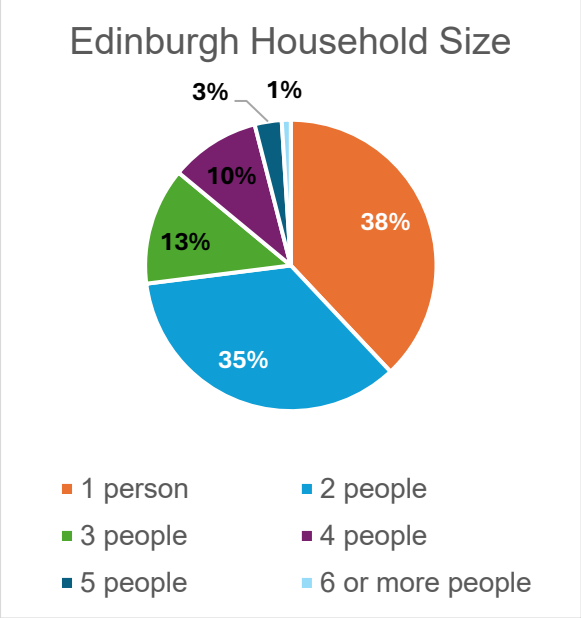
From 2011-2022, the proportion of people reporting a physical disability increased from 5.1% to 6.7%, for mental health conditions the figure increased from 4.2% to 11.9%, over 50% for people aged 65 or over. Just under 84% of Edinburgh's population consider their health to be good or very good.

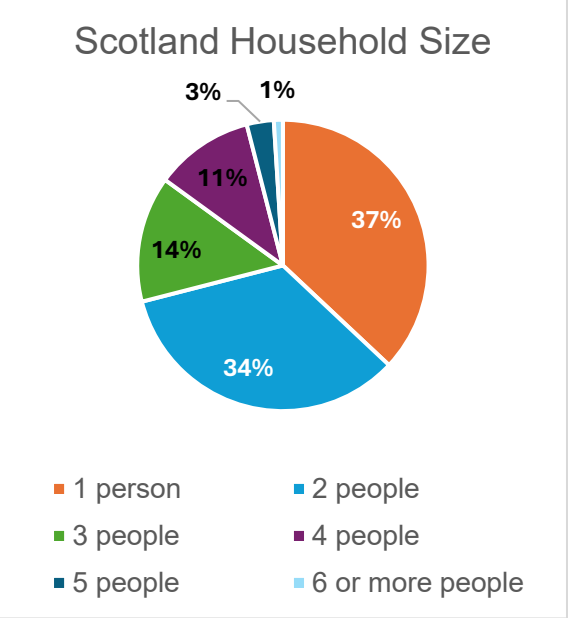
Housing in Edinburgh

Edinburgh has declared a housing emergency (2023), at the time stating that around 7,000 households lacked a permanent home, with a need for over 5,000 homes to address homelessness. 17% of Edinburgh's residents – and 20% of all children – are living in poverty across the city. Only 16% of households in the city are in social rent housing whilst the Scottish average is 22%.

National Records Scotland (NRS) figures for 2024 indicate there are 244,791 households in Edinburgh, a 7.5% increase in the last 10 years, compared with a 6.1% rise for Scotland.

Average household size has been falling, nationally and in the city, in Edinburgh it is now 1.96 people, nationally 2.08. The largest proportion of households are one or two people.



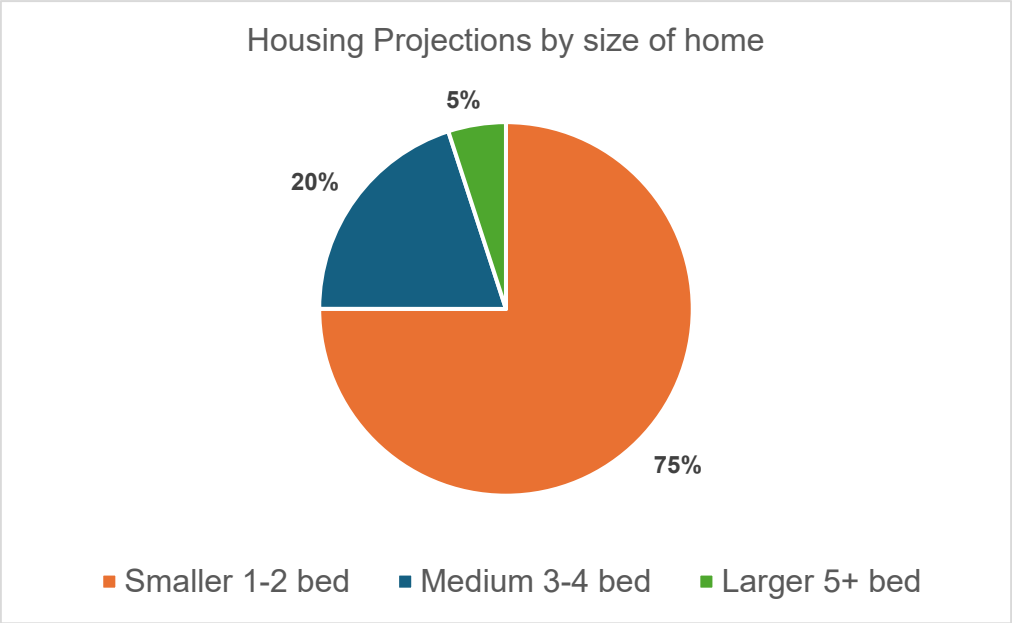


(source: NRS household projections, 2022 based)

Recent completions data show that the largest proportion of new housing (43%) has been 2 bed properties. Scotland's Census 2022 shows that Edinburgh has a lower proportion of homes with three or more bedrooms than the national figure, 40%

compared with 52%. The Local Housing Strategy identifies that there is also a significant demand for affordable larger family homes.

The period to 2043 shows a projected increase of approximately 50,000 new households over 2018 levels and the greatest increase is in one adult and two adult households indicating a continuing trend of smaller household size.

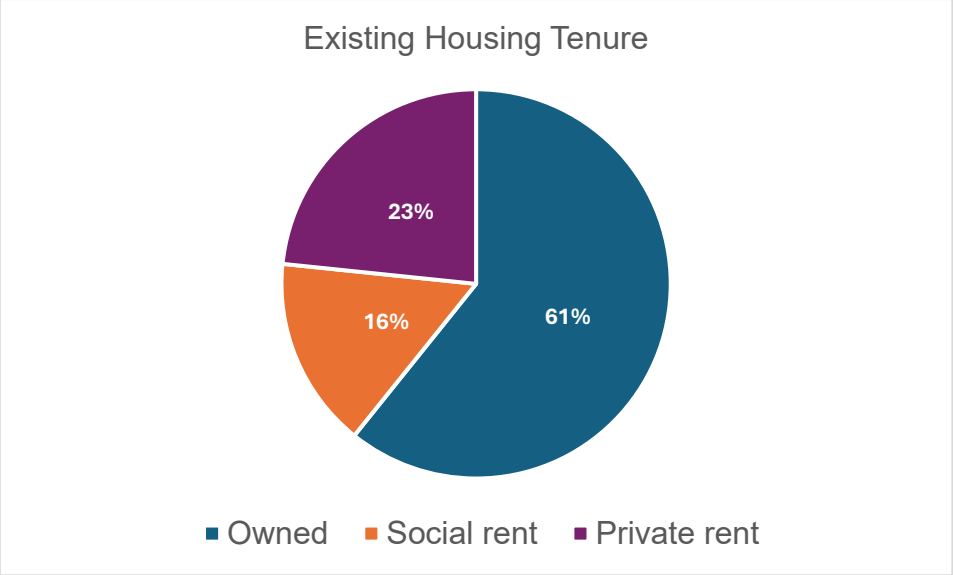


(source: NRS household projections, 2022 based)

Edinburgh's Local Housing Strategy reports that 17% of Edinburgh's residents – and 20% of all children – are living in poverty across the city. According to the Scottish Index of Multiple Deprivation (SIMD), 71 areas in Edinburgh fall within the most deprived 20%. Within this, 30 areas fall within the 10% most deprived and 18 within the most deprived 5%.

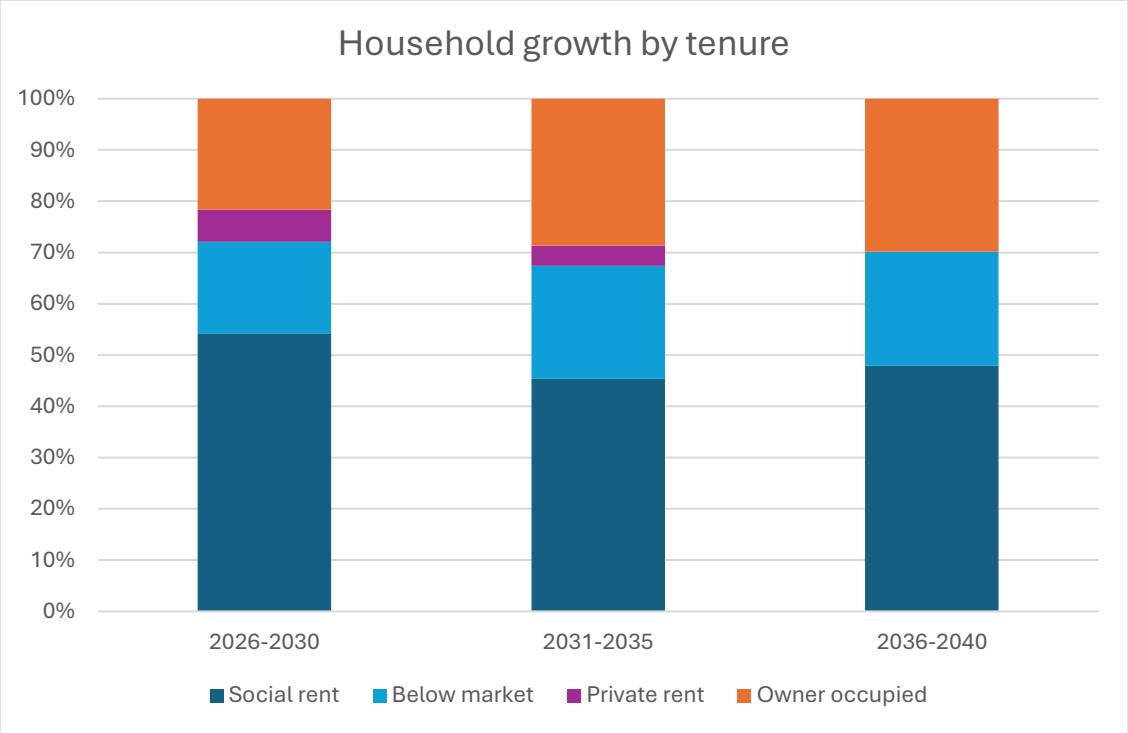
Living in poverty is one of the main causes of poor health and health inequalities. Public Health Scotland's Healthy Housing for Scotland report 2021 estimated that 19% of Scotland's population were living in relative poverty after housing costs. The availability of affordable housing in a particular area can constrain or facilitate access to work.

Only 16% of households in the city are in social rent housing, notably lower than the Scottish average of 22%, with a corresponding 23% of households in the private rented sector in Edinburgh, much larger than the Scottish average of 13%.



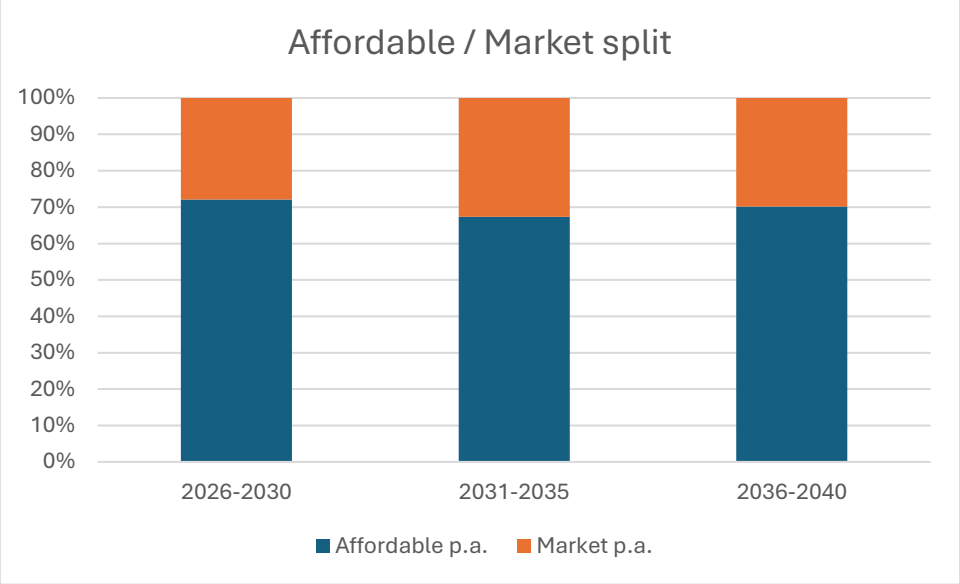
(source: Local Housing Strategy, 2025)

The most recent Housing Need and Demand Assessment (HNDA3) projections by tenure show that some 70% of predicted household growth is for affordable tenures, with the highest proportion being for social rent.



(source: SES HNDA3)

The proportion of affordable verses market averages at 70% over the plan period.



(source: SES HNDA3)

Edinburgh Economy

The City Centre remains resilient with development pressures including office and hotel uses in addition to retail, food and drink, leisure and other commercial uses, with the redeveloped St James Quarter proving successful and Princes Street undergoing a period of transition incorporating broader leisure and commercial activities.

The city continues to attract investment in the city centre and elsewhere with West Edinburgh a significant opportunity for a major extension to the city based around the tramline, where minded to grant decisions for some 11,000 homes with a mix of uses await conclusion of legal agreements. Also, the BioQuarter where a new Proposal of Application notice for a mix of uses including medical research, office, commercial and homes was submitted in April 2026 with some 2000 homes anticipated in addition to core medical research and education facilities. Granton is seeing residential led mixed-use development which will provide over 3000 new net zero homes including the Demonstrator homes already built around the refurbished Granton Station building, restoration of which provides for a range of new uses. Edinburgh Park continues to diversify with an approved concert/event space, residential led mixed use as well as high quality office space.

In addition to City Region Deal and higher education investment as part of BioQuarter and the Heriot Watt campus, the higher education sector is a significant part of the economy and, in particular, student accommodation remains a significant pressure for many parts of the city.

Tourism is also one of the city's success stories, attracting 4.54 million visits a year and creating training and employment opportunities for residents but also bringing its own pressures on the environment, accommodation, infrastructure and quality of life for residents. Future growth needs to be carefully managed.

This all accentuates competing demands for land – for homes, offices, tourism and student accommodation, business and industry in a relatively small city.

Like everywhere else that growth and life of the city needs to be planned in the context of climate change and adaptation needs. How we manage water and temperature, reduce emissions, protect and enhance nature and biodiversity. How we retrofit a historic city and its World Heritage Sites, listed buildings amongst other assets to face these challenges.

For the City this means where do people live, how affordable is it, how do they move around, how do its places support their health and well-being and enhance their lives and how can growth be shared. Whilst the City is a primary economic engine for the country, there is significant historic, deep-rooted inequality, poverty and deprivation as well as a housing emergency, with high market rents and prices and a much lower proportion of social rent homes than other parts of the country.

Many of the policy matters are covered by NPF4 but also consideration needs to be given to what additional local policies, if any, may be needed to reflect the particular characteristics and problems of Edinburgh. The Evidence Report gives the basis for the decisions which need to be made for the strategy, proposals and policies for the Proposed Plan.

The strategic opportunities and constraints along with more detailed implications as set out in the following Topic Papers and Place Profiles themselves need careful consideration in developing the Proposed Plan strategy, proposals and policies to ensure that legislative and NPF4 requirements are met, that the Proposed Plan continues to be supported by Key Agencies and that the Council's objectives can be supported and delivered where land use planning has the opportunity to do so.

As part of this, an infrastructure first approach needs to be taken and where infrastructure is not available, how that can be delivered to support the likely level of development. In the Proposed Plan and Delivery Programme, there needs to be a recognition that the minimum all-tenure housing land requirement (MATHLR) is set with a 25% generosity and that the local housing land requirement (LHLR) is proposed with additional homes to the MATHLR to be ambitious.

Summary of topic papers and strategic implications

Topic Papers 01a to 01h (Infrastructure) consider the capacity of the city to grow – how does Edinburgh work as a place, including transport modes, education, water, waste, and the infrastructure that provides energy for all these things and the homes we live in.

The findings of these papers point to some degrees of capacity to potentially support growth but overall it is clear in many areas that infrastructure interventions will be needed and that sources of funding and delivery, including planning obligations and developer contributions, will be needed. This in itself needs careful consideration as significant construction cost increases over recent years have placed pressure on viability so the Delivery Programme will be key alongside the Proposed Plan in defining not just what needs to be done and where to support the level of population growth the city faces but who should deliver it and what the likely costs would be.

01a Transport - this considers the capacity of the different transport modes and relevant infrastructure available in the city, including active travel, public transport, private car and freight. It looks at where there are issues of capacity and congestion and the national policy requirements for how transport networks should be shaped in the context of the national transport hierarchy.

There are constraints as well as opportunities and the Proposed Plan will need to consider development strategy and proposals in response to baseline issues, with a Transport Appraisal as part of the process to inform and test options.

01b Education - with a lot of schools at or nearing capacity, this could be a constraint to new housing growth. Schools which have some capacity may see projected rolls rising, whilst development opportunities may not exist within their catchment. The Plan will need to consider where capacity opportunities exist, how this could serve development opportunities and what would be needed to allow development opportunities not easily served by any capacity to come forward.

01c Health and social care - the Council works closely with the NHS and will continue to ensure that up-to date-information can inform the Proposed Plan. Most GP surgeries are under pressure due to population growth and new development. There are few areas with spare capacity which could serve new development. Therefore, the Proposed Plan will need to consider how new development can be appropriately served by primary health care capacity including new premises, which may require planning obligations to mitigate the impact of development.

NHS Lothian has also committed to compiling data on a condition survey of all the existing practices by the end of 2026, this is identified as an evidence gap that can be fulfilled in the preparation of the Proposed Plan.

With the predicted demographic changes, including an aging population, will come more demand for health and care services including care homes. The Proposed Plan

will need to consider how it can support and help deliver new care homes in the right locations.

01d Energy and digital - there are varying levels of electricity capacity in different parts of the city and this needs to be considered in the Proposed Plan as a potential locational opportunity or constraint unless capacity can be added for otherwise appropriate sites. Given net zero requirements, it is not considered the gas network would be a constraint to new development. Digital infrastructure is very good and it must be considered how the Proposed Plan will continue to support this and to ensure new development can be appropriately served.

01e Water and waste water - current infrastructure is assessed as having capacity though this will need to be considered in the context of both the level and location of development needed and the allocation of sites.

01f Pipelines and major hazards - all areas of risk are mapped on GIS and site assessment and the Proposed Plan will need to consider any issues in assessing strategy, proposals and policies.

01g Cemeteries, crematoriums and mortuaries - there is recognised pressure on cemetery space so the proposed plan will need to consider allocation in principle and through practical assessment as well as locational and transport considerations. Crematorium and mortuary capacity is considered adequate.

01h Minerals, coal and peat - the evidence is that there is a substantially greater supply of construction aggregates than the 10 year requirement. The Proposed Plan will need to consider monitoring and policy approaches to ensure this can be maintained, subject to environmental considerations and designations.

Topics 02-11 cover environment issues in depth, emphasising the need to look at the topics as a series of interlinked requirements rather than a range of separate subjects as well as linking to infrastructure and strategy issues including the climate and nature crises. Edinburgh's heritage is important to its sense of place for residents and for visitors and so has economic as well as place benefits. It requires careful management and consideration regards to climate adaptation and net zero ambitions. Edinburgh's parks, open space, trees and waterways are a fundamental part of Edinburgh's character and important for health and wellbeing, supporting habitats and playing a critical part in helping to manage climate change. Their continued protection and enhanced will be an important consideration.

Topic 02 Natural Places - this considers the evidence in relation to important natural assets, including protected areas for biodiversity and landscape, forestry, woodland and trees and soils.

Some local nature designations and tree protections are not covered by NPF4 policies so the Proposed Plan will need to consider whether additional policy protection as well as designation of sites will be needed. The Proposed Plan will need to consider what the baseline evidence means for existing designations for

green belt and landscape sensitivity to review function in the context of NPF4 policies and boundaries. As well as the Strategic Environment Assessment, the Habitats Regulations Appraisal will be used in assessing proposals and shaping the strategy and site assessments. Woodland and soil protection considerations will also need to inform these.

Topic 03 Green belt, countryside and rural - evidence, including the Council's Landscape and Green Belt Review, will inform a review of these designations and their interactions in conjunction with development need and demand, site assessments and any allocations of land needed for development so that the Proposed Plan can consider the balance of these and the implications of them for the spatial strategy and proposed allocations.

Topic 04 Water management, flood risk and coastal development - this is informed by a range of sources including a Strategic Flood Risk Assessment (SFRA) It will feed into site assessments for the Proposed Plan along with NPF4 and SEPA considerations, including whether site specific flood risk assessments will be required. It will also feed into water management proposals and green blue network considerations. The Council's emerging Coastal Change Adaptation Plan will also be a consideration for the Proposed Plan in assessing where development should or should not happen within the coastal area.

Topic 05 Biodiversity - this sets out the baseline evidence for the area and that further habitat and species survey work will continue to update this so the Proposed Plan can consider a review of designations and any additions to them, including a new Nature Network. The plan will need to consider this in the context of climate change and adaptation, water management and green blue network considerations amongst others. Also, it will need to consider how the spatial strategy, proposals and policies are informed by and may help protect and enhance Edinburgh's locally identified natural heritage that support biodiversity.

Topic 06 Blue green infrastructure, open space and recreation - this covers the range and extent of open space uses in the council area, part of its character and amenity. The Council's Play Sufficiency Assessment has audited and mapped all Council owned play areas as well as selected non-Council play facilities which are publicly accessible and can contribute to an area's sufficiency of play provision. This and other evidence will enable the Proposed Plan to consider where new provision is required and can add to the overall open space, play and green blue networks. This needs to be considered alongside nature network proposals and water management needs and opportunities.

Topic 07 Zero waste, energy, heating and cooling - this considers evidence on waste management, the electricity grid and low and zero carbon generating technology opportunities and decarbonising of heating, including heat networks.

For zero waste, the evidence on waste volume and capacities indicate that facilities are operating within their licenced capacity. This will continue to be monitored and

considered in the preparation of the Proposed Plan, including any potential need to provide or safeguard new/extended waste management facilities.

For energy, the Proposed Plan needs to consider the Landscape Sensitivity Assessment and what this means for opportunities for battery storage systems (BESS), solar and wind energy.

For heating and cooling, the Proposed Plan will need to consider what the Council's local heat and energy efficient strategy (LHEES) might mean for spatial strategy and possible development sites, whether or not there may be benefits in designating the city as area of heat demand and how development should be considered in the context of heat networks if heat network zones cannot be established, given NPF4 policy is linked to heat network zones.

Topic 08 and 09 Climate mitigation and adaptation - the Council has declared and sought to address the climate emergency through strategies set out in the Topic Paper. Reducing emissions is part of this and given the extent to which these arise from transport and heating, the Proposed Plan needs to consider strategies, sites and design which could support reduction in heat needs or link to low or no carbon heat networks, and support good public transport, active travel networks and places for living well locally. It also needs to consider whether greater support can be given to low or no carbon power generation. Protecting and enhancing carbon stores may be part of this approach also. A further consideration will be to link with the Council's Coastal Change Adaptation Plan, flood risk and canopy cover aspects of other related topic papers.

Topic 10 Historic assets and places - a city with significant historic assets and strong pressures for growth needs a clear perspective on the legal and policy protections for that heritage. The Proposed Plan needs to consider the implications of strategy, proposals and policies for the whole range of designated assets in the context of the legislative national policy protection and whether any additional approaches are needed, including whether there is scope for local designations. It also needs to explore how it can support the city's at-risk heritage.

Topic 11 Design, quality and placemaking - NPF4 with its six qualities of a successful place and City Plan 2030 with its design policies, place policies and development principles promote good quality design and place-making in new development to support multiple health, social, economic and environmental benefits. The Proposed Plan needs to consider through its strategy, proposals and policies how it protects Edinburgh's unique character and setting and delivers co-ordinated high quality development that provides a sense of place and supports local living.

Topic 12 Housing land - covers household growth so as to consider an indicative Local Housing Land Requirement (iLHLR) in response to the Minimum All Tenure Housing Land Requirement (MATHLR) in NPF4 and emerging evidence on need and demand for homes including updated household projections. This considers needs

for affordable housing and market housing. A fundamental issue for the plan strategy is to set that LHLR at a higher figure than the MATHLR on a reasoned and justifiable basis. This needs to take account of the most recent evidence of housing need and demand and household projections and give due consideration to delivery and infrastructure considerations to the extent possible prior to strategy decisions and site allocations.

The box bellow sets out how inputs have been accounted for in setting the indicative Local Housing Land Requirement.

MATHLR **36,750**

+

2022 Household Projections update
(- 5,778 units)
'0'

+

Existing need update
1,766 units (additional)

+

Flexibility **25%**

=

iLHLR 38,950

(uplift on MATHLR of 2,208 6%)

The Proposed Plan will need to consider how it can support a wide range of housing models and tenures including co-living, build for rent and mid-market rent to meet different housing needs and provide housing options that could help to attract and retain people living and working within Edinburgh.

Whilst household sizes are decreasing, there is need and demand for affordable larger family homes, particularly to help with over-crowding. The Proposed Plan will need to consider household size projections and consider how to ensure that an appropriate mix of housing size is delivered.

Topic 13 Specialist housing and other accommodation covers demographics in more depth to provide evidence for specialist needs for homes including older people, disabled people and Gypsy/ Travellers and travelling showpeople.

The city's proportion of older people is increasing, as is the proportion of people with a disability. For both, the type of home as well as its affordability can be an issue. There are also gaps in provision for people with particular challenges for example suitable housing for people with learning disabilities or living with dementia, including care homes.

The Proposed Plan will need to consider the level of need for affordable accessible and adaptable homes, specialist accommodation that supports people with certain needs and whether there are appropriate proposal and policy approaches to support delivery.

Evidence from engagement and assessment of existing provision for Gypsy - Travellers and Travelling Showpeople means the Proposed Plan will need to consider whether a policy based approach remains appropriate or whether land allocations may be appropriate to address the needs of this range of communities through both public and private sites and support the delivery of adequate facilities.

Topic 14 Student Accommodation looks at student need and demand including updated student number trends, the types of accommodation including houses of multiple occupancy (HMOs), purpose built student accommodation (PBSA) and co-ops. Student numbers show a slight decline over the last few years whilst growth in PBSA and the development pipeline shows a continued increase. Those figures will be updated for the 2026-2027 academic year when available. The Proposed Plan will need to consider whether the existing policy based approach remains appropriate, needs modified or some other approach is required, which may mean consideration of land allocations.

Topics 15-17 look at issues concerned with how a place functions, how this links with health and wellbeing and how communities can better equip themselves to making better places and supporting people in their communities. Health, poverty and inequality are connected to economic and housing issues too, particularly around affordability and availability of good homes and access to jobs.

Topic 15 Local living - the Proposed Plan needs to consider how local living principles of density can contribute to the strategy, proposals and policies of the Proposed Plan in delivering the objectives of NPF4 and other Council strategies. These include density, mix of uses, active travel and public transport links and green blue networks. The Place Profiles builds on this topic area and examine how each ward is working in terms of living well locally and what improvements could be made

Topic 16 Health and wellbeing – the Proposed Plan will need to consider how its approach can help to mitigate and reduce health and wellbeing inequalities that exist within the city and help support the Council's prevention agenda on poverty and the benefits of building improved, net zero housing appropriate for all needs. Issues of noise and air quality need to be considered when assessing possible sites.

Topic 17 Community wealth building - the preparation of the Proposed Plan will need to take into account any registered Local Place Plans and how it can use place policies to support local aspirations and to support the Council's Community Wealth Building Plan.

Topic Papers 18-20 cover all aspects of the economy, drawing from the Council commissioned Economic Needs Study and other evidence sources, updating on

trends and pressures in the office and retail markets and growth pressure from the leisure and tourism sectors.

Topic 18 Economy, business and industry the evidence shows that for the office, retail, visitor accommodation and leisure sectors there is strong market preference for city centre locations but limited availability of sites. This is currently affecting office delivery and office space is being lost to other uses, in particular to hotel use. The Proposed Plan will need to consider how best to manage these pressures.

Evidence shows there is sufficient industrial land to meet employment needs over the next ten years. Returns on industrial premises are currently relatively high and investment is delivering new industrial space. The majority of serviced and non-serviced land for industry lies to the west side of Edinburgh, in particular at Newbridge. The Proposed Plan will need to consider if there is a need to address this distribution of allocated land.

Topic 19 City, town, local and commercial centres - The Retail Study shows there is unlikely to be a need for additional retail floorspace in Edinburgh over the next ten years and the network of centres is robust in the face of changing retail trends, helped by supportive but flexible policies which also allow other uses. This includes the provision of affordable and healthy food but an approach may be needed where gaps are identified in the Place Profiles. Retail strategy and policy in the Proposed Plan will need to consider what the future balance should be for existing and for any new centres if required.

Topic 20 Tourism, culture and creativity - Edinburgh is a key tourist destination with a significant variety of heritage and cultural facilities attracting high visitor numbers whilst also providing residents a comprehensive offer. There are strong economic benefits and associated pressures.

The Proposed Plan will need to consider the approach to all types of visitor accommodation and their impacts on other uses, including office and residential, on heritage and on communities, given predicted demand for a significant increase in the number of hotel bed spaces over the next ten years.

Whilst the leisure and cultural offering is extensive and is a key economic and employment sector the Proposed Plan will need to consider how it is best supported in the future.

The large number and wide range of facilities and venues is mainly clustered in and around the city centre, though a large new concert venue is being developed at Edinburgh Park. The Proposed Plan will need to consider how this sector continues to be supported and widened out through the city, particularly for adequate provision of flexible community space to meet local needs and to help protect and retain existing provision, with gaps evidenced in the Place Profiles.

Overview of implications for the Proposed Plan

The Evidence Report gives the basis for the decisions which need to be made for the strategy, proposals and policies for the Proposed Plan, taking account of NPF4 and statutory requirements.

The strategic opportunities and constraints considered in the overview of the topics and place profiles above, along with more detailed implications as set out in the following Topic Papers and Place Profiles themselves need careful consideration in developing the Proposed Plan strategy, proposals and policies to ensure that legislative and NPF4 requirements are met, that the Plan continues to be supported by Key Agencies and that the Council's objectives can be supported and delivered where land use planning has the opportunity to do so.

Strategy needs to consider the number of homes against potential sites, the infrastructure options to enable them, what land may be needed to provide for appropriate density and what needs to go with homes for good placemaking such as schools, community facilities, businesses, services and open space. The spatial strategy needs to consider where they might be located, taking account of opportunities and constraints, site assessments (including deliverability), Transport and Education Appraisals, landscape and Green Belt review, flood risk assessments., power and heat networks, green and blue infrastructure.

As part of this an infrastructure first approach needs to be taken and, where infrastructure is not available, how that can be done. In the Proposed Plan and Delivery Programme there needs to be a recognition that MATHLR is set with 25% generosity and that the LHLR is proposed with additional homes to that, to be ambitious. As this then requires an additional level of infrastructure provision above the likely level of completions, care and imagination are needed in finding infrastructure solutions which support the likely level of development.

Once strategy options are considered, appraised and finalised, work on home numbers, density, mix and placemaking design needs to inform land allocations and ensure the strategy is workable and can provide for the LHLR. Place policies can then be formed to bring all those elements together in a clear visual expression

Many of the policy matters are covered by NPF4 but also consideration needs to be given to what additional local policies, if any, may be needed to reflect the particular characteristics and issues of the City. These may be needed to manage the strong development pressures for the benefit of existing and new places in the city.

Evaluation of Edinburgh's Previous Local Development Plans

Introduction

Paragraph 93 of the Scottish Government Local Development Planning Guidance (2023) states that 'as part of the preparation of the Evidence Report, the planning authority should evaluate whether the previous plan has delivered on its outcomes, and allocations, identify any lessons learnt for the preparation of the new plan and consider the appropriateness of the previous spatial strategy'.

Edinburgh's local development plan is City Plan 2030 which was adopted in November 2024. To address the above requirement, an evaluation of City Plan 2030 has been carried out; specifically:

- The extent to which its aims have been delivered or are being delivered to date and
- The effectiveness of the spatial strategy to date.

The evaluation does not include specific or detailed content on policy or spatial strategy matters; these will be considered during the preparation of the Proposed Plan.

Considering the relatively recent adoption of City Plan 2030, this evaluation also provides a high-level assessment of the spatial strategy for Edinburgh Local Development Plan which was adopted in November 2016 and was replaced by City Plan 2030.

This evaluation has not been subject to engagement and represents the observations of the planning authority. The 'Call for Ideas' stage will be an opportunity for stakeholders to raise issues and proposals for the Proposed Plan.

Local Development Plan 2016

The strategy of the Local Development Plan 2016 directed growth to four Strategic Development Areas: major redevelopment opportunities in the city centre, continuing regeneration at Edinburgh Waterfront, urban expansion with new tram and rail infrastructure at West Edinburgh and housing and business development on a range of sites in South East Edinburgh. There were also additional greenfield allocations at Queensferry, Currie and Balerno.

The Local Development Plan 2016 directed new housing to sites which met a range of assessment criteria including landscape impact, green belt boundaries, accessibility to public transport and infrastructure capacity. It sought to balance large scale opportunities while promoting the use of previously developed brownfield land and windfall sites.

The 2016 LDP was adopted on 24 November 2016 and was replaced by City Plan 2030 on 7 November 2024. The Housing Land Audits from 2018-2025, which show housing completion numbers from 1 April 2017 to 31 March 2025, reveal that around

20,000 housing units were completed over the approximate lifetime of the 2016 LDP. This figure includes completions from sites allocated in previous LDPs that were carried over to the 2016 LDP as well as from windfall sites.

Housing Delivery numbers	
Year	**Number of Completions (From HLA)**
2017-2018	2,651
2018-2019	2,399
2019-2020	2,967
2020-2021	1,700
2021-2022	2,786
2022-2023	2,790
2023-2024	2,019
2024-2025	2,831
Overall Total	**20,143**

The latest 2025 HLA shows that there are a number of housing sites that were in the 2016 LDP which are either still ongoing, are deliverable/deliverable with constraints but no progress has been made or are considered constrained. The table below shows how many units have been constructed within these sites during the approximate lifetime of the 2016 LDP and their remaining capacity.

Reference	Name	Units built between 1/4/17 and 31/3/25	Remaining capacity (at 31/3/25)	Progress
HSG 1	Springfield	88	88	Ongoing
HSG 5	Hillwood Row, Ratho	68	64	Ongoing
HSG 7	Edinburgh Zoo	0	80	None/Constrained
HSG 15	Greendykes Road	0	145	None
HSG 17	Greendykes	402	140	Ongoing
HSG 18	New Greendykes	567	130	Ongoing
CC 3	Fountainbridge	330	838	Ongoing
EW 1a	Leith Waterfront (Western Harbour)	186	2,233 (669 of which are constrained)	Ongoing/Constrained
EW 1b	Central Leith Waterfront	550	1,204	Ongoing
EW 1c	Leith Waterfront (Salamander Place)	668	606 (507 of which are constrained)	Ongoing/Constrained

EW 2a	Forth Quarter	99	1,297	Ongoing
EW 2b	Central Development Area	264	1,117	Ongoing
EW 2c	Granton Harbour	544	1,257 (889 of which are constrained)	Ongoing/Constrained
EW 2d	North Shore	0	528 (All Constrained)	Constrained
HSG 19	Maybury	667	1,405	Ongoing
HSG 20	Cammo	577	78	Ongoing
IBG	IBG	0	396	Constrained
Del 4	Edinburgh Park/South Gyle	97	1,801	Ongoing
HSG 24	Gilmerton Station Road	775	168	Ongoing
HSG 27	Newcraighall East	242	220	Ongoing
HSG 28	Ellen's Glen Road	0	240	None
HSG 29	Brunstane	0	1,330	Ongoing
HSG 30	Moredunvale Road	0	200	None/Constrained
HSG 31	Curriemuirend	0	188	None/Constrained
HSG 32	Builyeon Road, Queensferry	147	795	Ongoing
HSG 33	South Scotstoun, Queensferry	262	118	Ongoing
HSG 40	South East Wedge South: Edmonstone	0	709	Ongoing

Where the housing sites have been completed or nearing completion; it will be important – as part of the Proposed Plan process - to evaluate these in relation to the current NPF4 context; and whether they meet its spatial principles and policies.

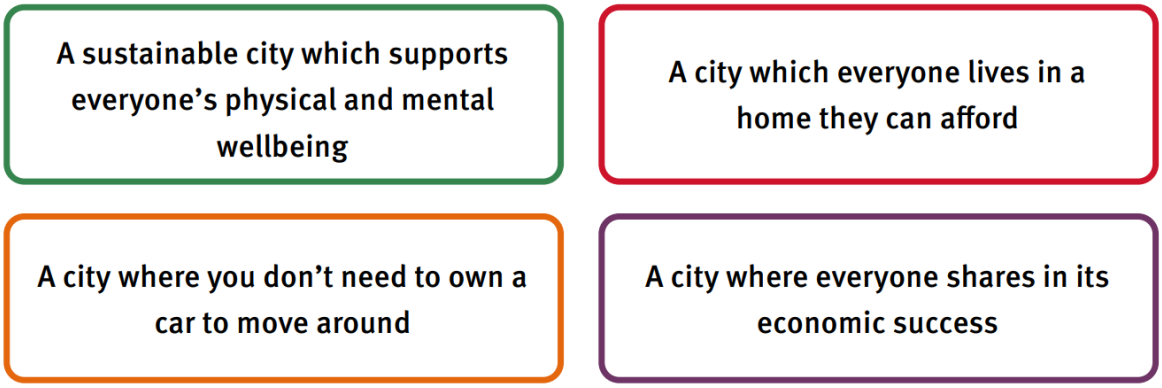
City Plan 2030

City Plan 2030 was partially prepared in a transitional period when new planning legislation was introduced alongside the publication of NPF4. City Plan 2030 is the last 'old style' local development plan to be adopted. However, it benefits from being prepared along similar timescales to NPF4, meaning that its strategy, aims and policy align with the new national ambitions within.

Spatial Strategy and Aims

The spatial strategy of City Plan 2030 is expressed as a series of aims and objectives. It sets an overarching strategy which minimises greenfield release to favour more sustainable use of existing urban land.

The Plan sets out that by 2030 Edinburgh wants to be:



The Plan aims to ensure that the planning of housing, employment and services addresses the need for net-zero development, resilience to climate change, quality places and green spaces, delivery of community infrastructure and job opportunities where people live and embeds a 20-minute neighbourhood principle at the heart of all places in Edinburgh.

There are 10 objectives to meet these aims (page 8) which given the adoption date of City Plan 2030, are all in progress. The following outlines these objectives and provides a commentary on the approach taken, including summarising key evidence from the Evidence Report.

Objective 1

Delivering a network of **20-minute neighbourhoods** and embedding a **'place-based' approach** to the creation of high quality, high density, mixed-use and walkable communities, linked by better active travel and public transport infrastructure, green and blue networks and bringing community services closer to homes.

Commentary

City Plan 2030 embedded the travel and investment hierarchies as set out in National Transport Strategy 2 within the appraisal and assessment of potential development options to inform the spatial strategy from the outset.

City Plan's spatial strategy directs growth to brownfield sites within the urban area, which are already well served by shops and services, community facilities and good active travel and public transport infrastructure.

Where development is directed to strategic expansion areas such as West Edinburgh, there is good existing public transport such as the tram or transport improvement proposals. The development principles for these areas are focussed on housing-led mixed-use development based on 20-minute neighbourhood principles as developed through; for example, the West Edinburgh Placemaking Framework and the Seafield Place Brief and Masterplan.

The place policies and development principles set out in the Plan establish the 'place- based approach'. Policy Hou 1 (Housing Development) states that 'where no place policy or development principles are provided, proposals for housing development should meet with the requirements of the Housing Density policy Env 26, provide any required community facilities as set out in Inf 1 (Access to Community Facilities) and any other infrastructure requirements in accordance with Inf 3 (Infrastructure Delivery and Developer Contributions).'

City Plan 2030 also states that the intent of its Infrastructure and Transport policies (Inf 1- 22) are 'to ensure that new housing development is directed to where residents can access a range of key services within a reasonable distance. This supports local living and the 20-minute neighbourhood concept'.

Although early in the plan period, the 2025 Housing Land Audit (HLA) already shows that several sites, newly allocated in the plan, have had applications for housing-led development approved on them, whilst other housing-led developments are at the minded to grant stage. The developments approved or minded to-grant are compliant with the relevant City Plan 2030 policies, place policy and development principles where applicable. They will therefore be high quality, high density, mixed use and walkable communities, delivering a network of 20-minute neighbourhoods. The progress of sites newly allocated in City Plan 2030 is set out in Table 2 below.

Objective 2

Directing new development to, and maximising the use of, **brownfield land rather than greenfield land**, improving and re-imaging Edinburgh's neighbourhoods, rebuilding the city from within and delivering new communities in Edinburgh Waterfront, West Edinburgh and on other major development sites across the city.

Commentary

City Plan 2030's spatial strategy directs growth to brownfield sites within the urban area. The 2025 HLA recorded the second highest levels of completions on record within the City of Edinburgh Council area at 2,831 units. Whilst it is noted that the majority of these completions have come from sites that were allocated in the previous LDP, the HLA shows that 1,611 units (57%) were on brownfield sites.

Although early in the plan period, the 2025 HLA already shows that several brownfield sites, newly allocated in the plan, have applications for housing approved on them and that some, like Crosswinds (H61) and SAICA (H59) now have very large, proposed housing-led developments at the minded to grant stage. The progress of sites newly allocated in City Plan 2030 is set out in Table 2 below.

It is, however, acknowledged that since the Plan has been adopted, the already challenging economic circumstances are becoming more difficult. As a result, site viability and the cost of developing on brownfield sites has become a concern increasingly raised by developers. The next HLAs will show whether the brownfield

sites, including major development sites across the city, allocated within City Plan 2030, are developed at the level in which they are currently programmed.

Objective 3

Setting out **Place Policies, Development Principles** and preparing **Place Briefs** to guide development and to integrate new services and supporting **Local Place Plans** to help create sustainable communities.

Commentary

City Plan 2030 sets out 36 place policies, each with development principles. The feedback received so far from planning officers is that the place policies and development principles have been very useful in guiding development proposals and for directing discussion and intent relating to these sites. Work on producing Place Briefs has also begun for Astley Ainsley (Place 3) and Seafield (Place 15). This work includes comprehensive stakeholder engagement and will set out design principles to inform the development of proposals at an early stage.

The planning authority has supported community bodies in the preparation of Local Place Plans and at this time; there are three registered Local Place Plans with a further number anticipated to be submitted. These will be taken into account in the preparation of the Proposed Plan.

Objective 4

Requiring **all new buildings to be net-zero** in their operational emissions through their fabric, design and the use of low and zero-carbon generating technologies and to be more resilient to climate change. City Plan supports the delivery of **heat networks and energy infrastructure development,** including in mixed-tenure and heritage building settings, to help Edinburgh transition to net-zero.

Commentary

The Environment Policies Env 7 (Sustainable Developments) and 8 (New Sustainable Buildings) and policy Inf 16 (Sustainable Energy and Heat Networks) are a fundamental step change compared to those in the previous Local Development Plan 2016, bringing a clear focus on the climate and nature crises as required by NPF4. In particular, Policy Env 7 states that ‘all detailed proposals involving the construction, redevelopment or change of use of one or more buildings must incorporate all reasonably practicable measures to address the climate emergency and contribute to sustainable living, with this being demonstrated through a Sustainability Statement.’

Since the adoption of the plan, the planning authority has updated the Edinburgh Design Guidance, the Guidance for Householders and the Listed Buildings and Conservation Areas Guidance to reflect the updated policies of City Plan 2030 and NPF4.

This non-statutory planning guidance provides additional information on the policies of City Plan 2030 and NPF4. In particular, the Edinburgh Design Guidance provides more detailed guidance on climate adaptation including whole life emissions, operational emissions, sustainable heating and heat networks.

There has been some resistance within the development industry towards the extra demands these policies have placed on development and the potential additional costs they entail. However, there is also strong support for these policies in recognition of the magnitude and importance of the climate and nature crises.

Section 3F of the Town and Country Planning Act (Scotland) Act 1997 had, in broad terms, required LDPs to include policies requiring all developments to avoid greenhouse gas emissions. This section was repealed following the adoption of City Plan 2030.

Whilst an increasing number of developments have been assessed against the environmental policies and have been approved, it will ultimately take more time to measure whether the policies have been successful overall in ensuring that all new buildings are net-zero in their operational emissions, are more resilient to climate change and that heat networks and energy infrastructure development has been supported.

Objective 5

Implementing environment policies to deal with **climate change mitigation and adaptation**, protect our beautiful green setting, increase biodiversity, physical and mental wellbeing, reduce flooding and other climate impacts, and improve air quality.

Commentary

The Environment and Design Policies (Env 1-38), set out in City Plan 2030, are set out first in City Plan 2030, highlighting their importance to the Plan.

The overarching strategy of City Plan 2030 reflects the objectives to preserve and protect the environment, including Edinburgh's green setting. Where development is proposed, this is planned alongside greenspaces and to minimise climate impacts.

As noted under the commentary for Objective 4, the planning authority has produced updated guidance on how development can help address the climate and nature crises at a local level.

Whilst an increasing number of developments have been assessed against new and revised environment and design policies, it is still, ultimately, too early in the plan period to determine if the policies successfully deal with climate change mitigation and adaptation, protect our beautiful green setting, increase biodiversity, physical and mental wellbeing, reduce flooding and other climate impacts, and improve air quality.

Objective 6

Delivering land to meet Edinburgh's housing needs over the next decade and securing a minimum **35% affordable housing contribution** from new developments in Edinburgh.

Commentary

City Plan 2030 sets out a total anticipated land supply of 40,288 units, through a mixture of existing sites and new sites. This is set against the Minimum All-Tenure Land Requirement of 36,750 from NPF4 which forms City Plan 2030's targeted supply.

Since adoption of City Plan 2030, the latest 2025 HLA has recorded the second highest level of completions on record at 2,831 units, including 885 affordable units. However, it should be noted that this latest HLA covers the period from 1 April 2024 to 31 March 2025 so only covers a short period post adoption of the Plan.

Policy Hou 2 (Affordable Housing) states that 'developments including conversions, consisting of 12 or more units should normally provide affordable housing amounting to 35% of the total number of units proposed.' Although early in the plan period, there are already some very large strategic expansion sites, such as West Edinburgh, which have housing-led developments at the minded to grant stage. These sites, when granted, will provide a 35% affordable housing contribution.

The annual HLA will continue to monitor the progress of sites through the planning process including the delivery of affordable housing. The progress of sites newly allocated in City Plan 2030 is set out in Table 2 below.

Objective 7

Protecting the availability of housing and **protecting residential amenity** and ensuring any uses in residential areas are appropriate.

Commentary

The availability of land for housing and protecting the existing stock of housing is key to ensure Edinburgh can provide for the existing and future population.

The Proposed City Plan 2030 included a 'Loss of Housing' policy but through the examination process, it was recommended that this policy was removed. It was concluded that NPF4 Policy 30 e), City Plan 2030 Policy Hou 6 (Inappropriate Uses in Residential Areas) and the short-term let control area designated in 2022 were sufficient to protect the loss of residential use to short-term let and protect residential amenity.

However, feedback indicates that City Plan 2030 would have benefitted from retaining the loss of housing policy as this is essential to maintain existing housing stock not just residential amenity, the protection of residential use should also be the

key consideration while balancing it with amenity and identified demonstrable local economic benefits secondary.

However, since the adoption of City Plan 2030, the Council has refused approximately 800 planning applications (for change of use from residential to short-term let) and certificates of lawfulness (confirming the existing use as short term let accommodation). Where the decision was appealed, approximately 315 appeals have been dismissed.

It is considered that Policy Hou 6 has been used to protect residential amenity in the assessment of many applications.

Since adoption of City Plan 2030, there are also a number of planning applications and appeal decisions relating to the use of allocated housing sites for purposes other than housing. One of the Plan's primary roles is providing land to ensure the MATHLR is met, however, some forms of accommodation do not meet the definition of housing such as student accommodation. The topic papers for housing land and student accommodation make further reference to this issue.

Objective 8

Adopting an 'infrastructure first' approach, directing new development to where there is existing infrastructure. Where required to support new development, the Plan requires new and expanded community infrastructure including schools, healthcare, sustainable transport, energy, and waste to support our spatial strategy.

Commentary

City Plan 2030's spatial strategy directs growth to brownfield sites within the urban area, which are already well served by existing infrastructure. In strategic expansion areas, like West Edinburgh, there was already some existing infrastructure, notably the tram line.

City Plan Policy Inf 3 (Infrastructure Delivery and Developer Contributions) states 'development will be supported where there is sufficient infrastructure capacity already being available or can be delivered at the appropriate time or where the development can deliver the infrastructure necessary to mitigate any negative impacts. This should be secured by legal agreement. Where, by the nature of the infrastructure, it cannot be delivered by the developer directly, developer contributions will be sought.'

Since City Plan 2030 was adopted, the Developer Contributions and Infrastructure Delivery planning guidance was approved. This non-statutory guidance interprets and implements Policy Inf 3 (Infrastructure and Developer Contributions) and NPF4 Policy 18 Infrastructure first. The guidance is a material consideration used to assist in assessing planning applications including the provisions to include legal agreements requiring contributions towards delivering infrastructure associated with development.

It is the Council's preferred approach to secure infrastructure delivery directly through the development design and layout wherever possible. This will be secured by condition or legal agreement, as part of the planning permission, with timing of its delivery aligned with construction and occupancy.

It is acknowledged that the level of developer contributions will be the subject of debate and negotiation through the planning application process which may lead to delays in delivery. The annual HLA and bi-annual Delivery Programme will continue to monitor the progress of sites through the planning process.

Objective 9

Where new infrastructure is required, we will take a consultative approach with communities to address future healthcare and education requirements alongside rising school rolls and the requirements of the Edinburgh Local Development Plan 2016.

Commentary

The Council has continued to take a consultative approach with communities to address future healthcare and education requirements. This has been achieved through the work of Planning; for example, in the development of the West Edinburgh Placemaking Framework and the draft Seafield Place Brief.

Other stakeholders and Council services – notably the Edinburgh Health and Social Care Partnership, Strategic Asset Planning and Learning Estate – have engaged with communities on the provision of new community infrastructure including a new community hub and community campus in Queensferry; a new primary school at Hunter's Hall Park and a new library facility at Blackhall. The Council will continue this consultative approach.

Objective 10

Deliver Edinburgh's key economic land use needs, including supporting the city centre, Edinburgh Waterfront, West Edinburgh, the Edinburgh BioQuarter, local centres, retail and leisure, and deliver land for modern business space, including as part of housing-led mixed-use development, and through policies which support businesses to thrive.

Commentary

An Economic Needs Study has been produced to support the City Plan 2040 Evidence Report. This provides an economic overview of key market sectors: Visitor Accommodation, Offices, Industrial, Retail and Leisure.

The Economic Needs Study also supports the implementation of City Plan 2030 and provides some insight into whether this objective is being met at this stage of the Plan.

City Plan 2030 contains Economy Policies (Econ 1 – Econ 7; Re 1- Re 11) covering a range of activity including commercial, office, business and industry, hotel, retail and leisure.

Edinburgh is a strong and resilient city, very successful in creating jobs and attracting investment. The economy's strength is based on a number of key sectors including finance, tourism, life sciences and higher education.

The Plan identifies a number of areas that are important for economic purposes. Some of these areas are protected by policy preventing loss of employment land to inappropriate uses, and the Plan has been largely successful in delivering this.

The Plan also continues to identify sufficient land supply for industrial uses. However, particularly in the city centre, there is evidence to suggest that office floorspace is being lost to hotels and commercial letting, and the existing policy framework is unable to prevent this.

The network of town/local centres and the retail sector is proving to be robust in the face of changing retail trends through diversification into other uses such as leisure and visitor accommodation. The evidence from the retail study shows there is sufficient overall convenience and comparison floorspace to meet expenditure requirements over the next ten years factoring in the increasing trend towards more online shopping.

Sites allocated in City Plan 2030

As noted under Objective 6, City Plan 2030 sets out a total anticipated supply of 40,288 units. The Plan allocates 95 sites for housing and further sites for mixed use. Housing allocations comprise of existing or 'legacy' sites which have continued from the previous LDP and newly allocated sites of which some are defined as 'opportunity' sites.

The following table outlines newly allocated sites in City Plan 2030 where progress is currently taking place.

Reference	Name	Capacity	Units Built (as of 31 March 2025)	Brownfield/ Greenfield	Progress
H8	Astley Ainsley	500	0	Brownfield	Work has begun on producing a Place Brief
H10	Watertoun Road	49	4	Brownfield	Started on site and delivering units
H16	Fettes Row	435	0	Brownfield	2 planning applications for 435 units, approved.
H17	Eyre Place	69	0	Brownfield	Application on part of site for 7 units, approved
H28	Cowan's Close	55	0	Brownfield	Application on part of site for 19 units, approved and nearing completion
H29	Silverlea	142	0	Brownfield	Application for 142 units approved and started on site
H34	Orchard Brae	151	0	Brownfield	Application for 151 units, approved
H39	Pitt Street	98	0	Brownfield	Application on part of the site for 98 units, approved
H40	Stead's Place	148	110	Brownfield	Started on site and delivering units
H42	Leith Walk/Manderston Street	235	0	Brownfield	Application on part of site for 54 units approved and started on site
H59	Land at Turnhouse Road (SAICA)	957	0	Brownfield	Full planning application approved

					subject to legal agreement
H61	Crosswinds	Up to 3,050	0	Brownfield	Planning permission in principle approved subject to legal agreement
H63	Edinburgh 205 (West Town)	7000	0	Greenfield	Planning permission in principle approved subject to legal agreement
H76	Peatville Gardens	10	0	Brownfield	Application for 10 units, approved
H82	Murrayburn Gate	135	0	Brownfield	Application on part of site for 73 units approved
H85	Redford Barracks	800	0	Brownfield	Advanced discussions are ongoing with the MOD
H96	East of Milburn Tower	1,350	0	Greenfield	Planning permission in principle approved. Several AMC applications now submitted for the site and are under assessment
Opp55	Seafield	800	0	Brownfield	Draft Place Brief and Masterplan approved and engagement complete

Note: the latest information relating to the progress of housing sites is largely taken from the approved 2025 HLA, which has a base date of 31 March 2025. It is likely that the number of units built within these sites has increased since that date and other City Plan 2030 sites may also have gained planning permission.

Conclusion

City Plan 2030 is effectively a ‘young’ plan and one which introduced new planning concepts and policy emphasis, as a result it is necessary to continue to monitor it further to measure its ultimate success. However, a benefit of this newness will be the ability to sharpen and shape areas that are still fresh and likely to continue into City Plan 2040. Throughout the Evidence Report, key issues for Edinburgh are identified going forward.

The Council will continue to monitor the effectiveness of the spatial strategy and policies of City Plan 2030 to determine whether it is meeting its stated aims. This will be done through ongoing regular discussions with all members of the Planning service and other Council services who deal with planning applications and appeals. The ‘Call for Ideas’ stage will be an opportunity for stakeholders to raise issues and proposals. The annual Housing Land Audit, reviewed by Homes for Scotland, will also continue to provide an assessment of the housing land supply. This work will feed into the Proposed Plan alongside the Evidence Report.

01a Infrastructure - transport

Topic	**01a Infrastructure - transport**
Description of topic	Assessment of Edinburgh's transport infrastructure and services, including capacity, availability, usage, constraints and investment priorities.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5)(d) – requires provision of information on the infrastructure of the district (including transport systems) • Section 15(5)(e) – requires provision of information on how that infrastructure is used • Regulation 9 – states that development planning should have regard to: - any regional Transport Strategy; and - any Local Transport Strategy
Relevant NPF4 Policies	• Policy 1 Tackling the climate and nature crises • Policy 2 Climate mitigation and adaptation • Policy 13 Sustainable transport • Policy 14 Design, quality and place • Policy 15 Local living and 20 minute neighbourhoods • Policy 18 Infrastructure first
Local Development Plan Guidance	The Guidance states that transport baseline should be established and that evidence of a commitment to the production of a transport appraisal should be set out. Demonstration of discussions with Transport Scotland to establish next steps should be evidenced.
Linked Topic Papers	• Topic 01c Infrastructure - health and social care • Topic 01f Infrastructure - pipelines and hazards • Topic 02 Natural places • Topic 03 Green belt, countryside and rural • Topic 06 Green blue infrastructure, open space and recreation • Topic 08 and 09 Climate change and climate mitigation • Topic 10 Historic assets and places • Topic 11 Design, quality and placemaking • Topic 15 Local living • Topic 16 Health and well-being • Topic 18 Economy, business and industry • Topic 19 City, town, local and commercial centres • Place Profiles
List of and links to evidence	• **CD674** National Transport Strategy 2, Transport Scotland, February 2020

- **CD116** A National Mission with Local Impact: Infrastructure Investment Plan 2021-22 to 2025-26, Scottish Government, February 2021
- **CD157** Infrastructure Delivery Pipeline, Scottish Government, January 2026
- **CD100** National Planning Framework 4, Scottish Government, February 2023
- **CD676** Strategic Transport Projects Review 2 Final Summary Report, Scottish Government, December 2022
- **CD677** Strategic Transport Projects Review 2 Final Technical Report, December 2022
- **CD678** Strategic Transport Projects Review 2, Project Pages, December 2022
- **CD673** Development Planning Transport Appraisal Guidance (DPTAG), Transport Scotland, October 2025
- **CD679** Transport and Travel in Scotland 2024, Transport Scotland, November 2025
- **CD672** Transport Scotland Active Travel Framework 2020, Transport Scotland, November 2019
- **CD610** Sustainable Travel to Stations 2023, Scotland's Railway, June 2023
- **CD141** Equally Safe: Scotland's Strategy for Preventing and Eradicating Violence Against Women and Girls, Scottish Government, November 2023
- **CD287** Edinburgh as a Feminist City Working Group Update, Update to City of Edinburgh Council Planning Committee, January 2026
- **CD194** Scotland's Census, Scottish Government, 2022
- **CD588** Estimates of station usage April 2024 to March 2025,Office of Rail and Road, December 2025
- **CD675** Scottish Transport Statistics 2025 – Road Network, Transport Scotland, March 2026
- **CD687** Road Traffic in Great Britain, UK Government, Department for Transport, June 2025
- **CD205** Scottish Government Planning Guidance: Local living and 20 minute neighbourhoods, Scottish Government, April 2024
- **CD124** Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, Scottish Parliament, October 2019
- **CD125** Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, Scottish Parliament, November 2024
- **CD655** SEStran 2035 Regional Transport Strategy, South East of Scotland Transport Partnership, March 2023
- **CD658** SEStran Regional Bus Strategy, South East of Scotland Transport Partnership, May 2024

- **CD656** SEStran Forth Freight Study - Case for Change, South East of Scotland Transport Partnership, March 2022
- **CD657** SEStran Forth Freight Study Preliminary Options Appraisal, South East of Scotland Transport Partnership, August 2022
- **CD669** SEStran Go Forth Freight Study Detailed Options Appraisal, March 2024
- **CD107** Regional Spatial Strategy for Edinburgh and South East Scotland City Region, City of Edinburgh Council and South East Scotland Councils
- **CD543** Midlothian Local Development Plan, Midlothian Council, November 2017
- **CD704** West Lothian Local Development Plan 2018, West Lothian Council, September 2018
- **CD437** East Lothian Council Local Development Plan 2018, East Lothian Council, September 2018
- **CD583** NHS Lothian Public Health A strengthened approach to prevention across the Lothian health and care system., NHS Lothian, August 2024
- **CD660** Travelling to Health Appointments: A literature review, South East of Scotland Transport Partnership, April 2025
- **CD085** Edinburgh Strategic Sustainable Transport Study Phase 2, City of Edinburgh Council, February 2021
- **CD384** West Edinburgh Transport Improvements Programme – Outline Business Case, Report to City of Edinburgh Council Transport and Environment Committee, February 2024
- **CD073** West Edinburgh Placemaking Framework and Strategic Masterplan, City of Edinburgh Council, November 2024
- **CD396** Towards West Edinburgh 2050: A Study to Inform Inclusive and Sustainable Growth, Aecom, Collective Architecture and Rettie, June 2024
- **CD061** City Plan 2030 Transport Appraisal Technical Note, City of Edinburgh Council, September 2021
- **CD033** City Plan 2030 Written Statement, City of Edinburgh Council, November 2024
- **CD063** City Plan 2030 Developer Contributions and Infrastructure Delivery Guidance, City of Edinburgh Council, September 2025
- **CD059** City Plan 2030 Delivery Programme 2025, City of Edinburgh Council, January 2025
- **CD076** City Mobility Plan 2021-2030, City of Edinburgh Council, February 2021
- **CD258** City Mobility Plan - Capital Investment Programme, Report to City of Edinburgh Council Transport and Environment Committee, May 2025

- **CD337** Our Future Streets, City of Edinburgh Council, February 2024
- **CD273** Core Paths Plan, City of Edinburgh Council, Spring 2008
- **CD077** City Mobility Plan Implementation Plan (Acive Travel), City of Edinburgh Council February 2024
- **CD078** City Mobility Plan Implementation Plan (Public transport), City of Edinburgh Council, February 2024
- **CD305** Electric Vehicle Charging – Programme Update City of Edinburgh Council, April 2024
- **CD087** Air Quality Action Plan, City of Edinburgh Council, January 2024
- **CD083** 2030 Climate Strategy, City of Edinburgh Council, December 2021
- **CD265** Climate Ready Edinburgh Plan 2024-2030, City of Edinburgh Council, August 2024
- **CD392** Edinburgh Children's Services Plan, City of Edinburgh Council and NHS Lothian, 2023
- **CD079** City Mobility Plan Implementation Plan (Road safety), City of Edinburgh Council, February 2024
- **CD339** Physical Activity and Sport Strategy for Edinburgh 2024 to 2034, City of Edinburgh Council, December 2024
- **CD377** Transport Asset Management Plan (TAMP), Report to City of Edinburgh Council Transport and Environment Committee, January 2024
- **CD080** City Mobility Plan Implementation Plan (Parking), City of Edinburgh Council, February 2024
- **CD238** 20 Minute Neighbourhood. Living Well Locally, City of Edinburgh Council, August 2023
- **CD329** Lothian Buses Patronage Data
- **CD527** Roadway Analytics, Intrix, accessed May 2026
- **CD703** Hands Up Scotland Survey, Walk Wheel Cycle Trust, June 2025
- **CD186** National Records for Scotland, population projections 2022, Scottish Government, January 2025
- **CD066** Non Statutory Guidance - Edinburgh Design Guidance, City of Edinburgh Council, September 2025
- **CD297** Edinburgh Street Design Guidance, City of Edinburgh Council March 2022
- **CD609** City Edinburgh Waverley Concept Masterplan Summary Report, Scotland's Railway
- **CD355** Roads and Infrastructure Investment Programme 2025/26, Report to City of Edinburgh Transport and Environment Committee, April 2025
- **CD680** UK Airport Data 2019, UK Civil Aviation Authority, 2020

- **CD681** UK Airport Data 2025, UK Civil Aviation Authority, 2026
- **CD442** Edinburgh Airport Masterplan 2016-2040, Edinburgh Airport, November 2016
- **CD232** Scottish Index of Multiple Deprivation, accessed 2026
- **CD451** A Just Capital: Actions to End Poverty in Edinburgh, Edinburgh Poverty Commission, September 2020
- **CD394** Edinburgh Walking and Cycling Index 2023, City of Edinburgh Council and Sustrans, March 2024

List of matters covered

This topic paper sets out evidence in relation to transport in line with the requirements of Sections 15(5)(d) and 15(5)(e) of the Town and Country Planning (Scotland) Act 1997. It details current national, regional and local policy context as well as current infrastructure and capacity, travel patterns and behaviour, planned investment and policy priorities and other transport related issues.

The first section of this paper is the Summary of Evidence used in appraising all aspects of transport in Edinburgh. This section leads with the strategic context which drives transport planning, infrastructure and use. This is followed by regional strategies and policies and concludes with Edinburgh specific strategies and policies.

The second section of the paper sets out information around travel patterns and behaviour in Edinburgh. This includes data on:

- general travel behaviour
- car kilometres driven on Edinburgh's roads
- travel to work
- travel to school
- car ownership
- population.

The third section of the paper examines the current situation with transport in Edinburgh. It sets out what infrastructure is available, what capacity there is and, where data is available, how that infrastructure is used. The structure of this section broadly follows the sustainable transport hierarchy set out in National Transport Strategy 2, SEStran Regional Transport Strategy 2035 and City Mobility Plan 2021-2030:

- active travel
- public transport

- rail
- living well locally
- shared mobility
- taxi
- road network
- car parking
- electric vehicles
- road safety
- environment
- freight
- canal
- transport poverty
- disused rail.

Summary of evidence

Strategic Context

National Transport Strategy 2

National Transport Strategy 2 (NTS2) sets out a national transport policy framework for Scotland, laying out a clear vision of a sustainable, inclusive, safe and accessible transport system which helps deliver a healthier, fairer and more prosperous Scotland. Its priorities are to reduce inequalities, take climate action, deliver inclusive economic growth and improve health and wellbeing. A key feature of NTS2 is the Sustainable Travel Hierarchy which promotes prioritisation of walking, wheeling, cycling, public transport and shared transport options over single occupancy private car use.

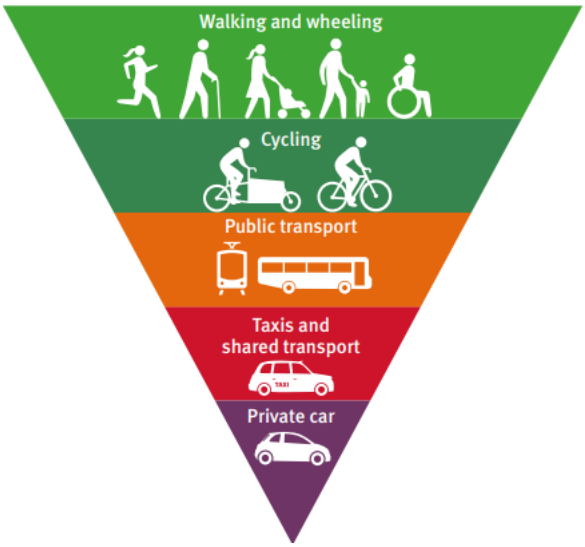


Figure 01a.1: Sustainable Transport Hierarchy

National Infrastructure Investment Plan 2021-22 to 2025-26

National Infrastructure Investment Plan 2021-22 to 2025-26, published in February 2021, is focused on delivering the recommendations of the Infrastructure Commission for Scotland. It sets out the Scottish Government's vision for infrastructure, focusing on three core strategic themes:

- enabling the transition to net zero emissions and environmental sustainability
- driving inclusive economic growth
- building resilient and sustainable places.

The Infrastructure Plan also features an investment hierarchy framework which prioritises use and maintenance of existing infrastructure ahead of investment in new infrastructure. The four steps in the hierarchy are:

- determine future need
- maximise the useful life of existing assets
- repurpose and co-locate
- replace, create and build new assets.

An update on progress of major projects within the Plan was published in August 2025. Transport projects relevant to Edinburgh included in the update were rail decarbonisation in Fife and Borders where the final business cases were approved in June 2025 and funding announced by Transport Scotland. Subsequent developments include:

- Borders – work is being undertaken for installation of foundations and masts for eventual wiring
- Fife – work has been undertaken on the line between Haymarket and Dalmeny and on the Levenmouth line and preparations have begun in the remainder of Fife.

In January 2026, consultation was started on a ten-year Infrastructure Strategy for the Infrastructure Plan. The Strategy sets out a ten-year framework (2027 to 2037) that will guide planning, investment and delivery of infrastructure. Further updates will be considered as the plan progresses.

Infrastructure Delivery Pipeline

In January 2026, the Scottish Government published an Infrastructure Delivery Pipeline for 2026 to 2030 which sets out detail of planned infrastructure projects

worth over £5 million and programmes worth over £20 million. There are several transport infrastructure projects relevant to Edinburgh in the pipeline, including:

- Borders Railway electrification and Fife electrification – this involves rail lines both into/out of and adjacent to Edinburgh
- Green Freeports – partnership work and funding to create a Green Freeport on the Firth of Forth including Port of Leith.

National Planning Framework 4

National Planning Framework 4 (NPF4) sets out six overarching spatial principles for planning future places:

- Just transition
- Conserving and recycling assets
- Local living
- Compact urban growth
- Rebalanced development
- Rural revitalisation.

Policy 13 is concerned with sustainable transport, aiming to encourage development that prioritise sustainable modes. Policy 14 encourages development that makes successful places by taking a design-led approach while Policy 15 promotes the application of the Place Principle to encourage local living and 20 minute neighbourhoods where people can easily access services and amenities using sustainable transport modes. Policy 18 supports an infrastructure first approach to development to ensure infrastructure is given sufficient prominence.

In addition to the policy framework, NPF4 includes a series of strategic national developments that will support delivery of its spatial strategy. The national developments relevant to transport in Edinburgh are:

- ND6 – Urban Mass/Rapid Transit Networks
- ND8 – National Walking, Cycling and Wheeling Network
- ND9 – Edinburgh Waterfront.

Strategic Transport Projects Review 2

Strategic Transport Projects Review 2 (STPR2) provides an overview of transport investment that is required to deliver the priorities of NTS2. Several Scotland wide recommendations in STPR2 will benefit Edinburgh, including cycle parking hubs, rail corridor enhancements, rail freight and high-speed rail. In terms of Edinburgh, Recommendation 12: Edinburgh and South East Scotland Mass Transit and Recommendation 43: Major Station Masterplans are particularly relevant.

Recommendation 12: Edinburgh and South East Scotland Mass Transit suggests that Transport Scotland should work with regional partners to develop and enhance the cross-boundary public transport system for Edinburgh and South East Scotland, potentially comprising tram and bus rapid transit. City of Edinburgh Council is working with Transport Scotland, SEStran and regional partners to develop and enhance the cross-boundary public transport system for the Edinburgh and South East Scotland region, potentially comprising tram and bus-based transit modes including bus rapid transit (BRT) and bus priority measures.

Recommendation 43: Major Station Masterplans states that station plans and masterplans should be progressed to align with and support the investment priorities of Transport Scotland and Network Rail. The Council is working with Transport Scotland, Network Rail and other partners on a masterplan for Waverley Station that will 'create a station for people – both passengers who use the station and people who live, work and enjoy the city.'

Transport Scotland's Development Planning and Management Transport Appraisal Guidance

Transport Scotland's Development Planning Transport Appraisal Guidance (DPTAG) highlights the importance of a sound evidence base, as a basis for transport appraisal work which is expected to accompany the preparation of the Proposed Plan.

Transport Scotland Active Travel Framework

Transport Scotland's Active Travel Framework pulls together key policy approaches to improving levels of walking and cycling in Scotland. The Framework is underpinned by seven national performance framework outcomes and five strategic objectives. Its vision for active travel is:

> *'Scotland's communities are shaped around people, with walking or cycling the most popular choice for shorter everyday journeys*.'

The Framework aims to achieve five key outcomes:

- Increase the number of people choosing walking, cycling and wheeling in Scotland
- High quality walking, cycling and wheeling infrastructure is available to all
- Walking, cycling and wheeling is safer for all
- Walking, cycling and wheeling is available to all
- Delivery of walking, cycling and wheeling is promoted and supported by a range of partners.

Success in achieving the Framework's aims will be measured by 15 key indicators.

Sustainable Travel to Stations

Published in June 2023, the Sustainable Travel to Stations strategy is aimed at making it easier and safer for train passengers to get to and from stations by non-car transport modes. It is targeted at statutory bodies and developers planning development near the rail network. The vision of the Strategy is:

> To grow the number of journeys passengers make to, and from, local neighbourhoods to the railway station by healthy and sustainable modes of transport: walking, wheeling, cycling, on-demand transport and the bus.

To achieve this, the Strategy focuses on the integration of stations into the communities they serve, stating that 'a station that properly serves a community should be a central asset in opening access to opportunity, increasing economic activity, and reducing driving to help hit government targets for carbon reduction and tackling climate change. It should integrate into the community it serves.'

The Strategy includes several recommendations that will help to achieve its aims. These include:

- Integrated Stations – ensuring that the Strategy is used in planning for key developments, that stations are considered key components of communities and that regional transport partnerships co-ordinate discussions with public transport operators
- Collaborating to Integrate – ensuring that the Strategy is used in planning, that collaborative engagement is employed, that Scotland's Railway leads on providing integrated stations
- Designing Integrated Stations – ensuring that new/redeveloped stations are designed to be integrated, that integrating existing stations is done in collaboration with local authorities, that new developments create Integrated Station Travel Plans, that the Strategy is used to inform station design.

Data from Scotrail's Travel to Station Survey shows that the most common method of travelling to stations in Edinburgh and surrounding local authority areas is walking and wheeling, however there are still relatively high levels of driving/being driven.

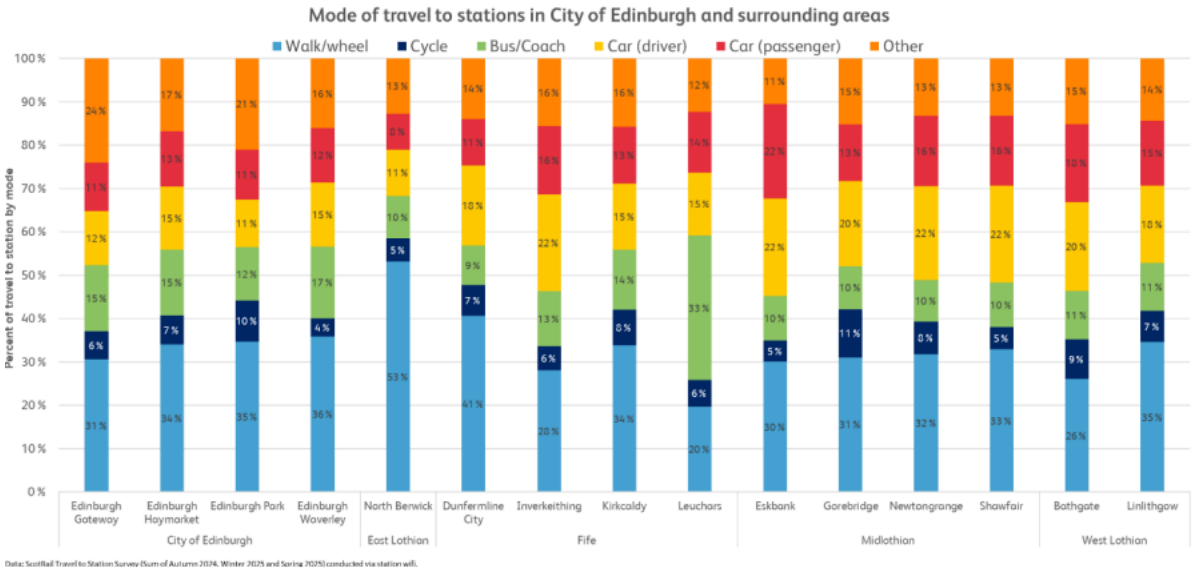


Figure 01a.2: Mode of travel to stations in City of Edinburgh and surrounding areas

Sustainable Travel to Stations Practitioners Guide

Sustainable Travel to Stations is supported by a practitioners guide aimed at anyone involved in delivering integrated stationers. It provides guidance on how to design integrated stations, the basis of accessibility, which groups should be involved in delivering integrated stations, how to understand the planning process, funding integrated stations and how to successfully collaborate.

Equally Safe: Scotland's Strategy for Preventing and Eradicating Violence Against Women and Girls

Equally Safe is a Scotland wide strategy to prevent all forms of violence against women and girls. The Strategy aims to work collaboratively with key partners in the public, private and third sectors to prevent and eradicate all forms of violence against women and girls.

The Strategy details the importance of place-making and transport in promoting safety, stressing that where people live and how people move about have a significant impact on our lives and that well designed spaces can 'design out' crime.

The City of Edinburgh Council also established a Feminist City Short Life Cross-Party Working Group to ensure gender equity is central to land use planning and the management and design of public spaces. This applies equally to transport and movement considerations as well as safety. The most recent report on this considers the steps taken to ensure that women's safety is a key consideration for this.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, in amending the Climate Change (Scotland) Act 2009, provides a legislative framework

for provision of setting targets for the reduction of greenhouse gases emissions and to make provision about advice, plans and reports in relation to those targets. It sets out a pathway to meeting Scotland's emissions reduction targets over the period to 2032.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 updated the 2019 Act in introducing a framework for a carbon budget-based approach for setting emissions reduction targets. The framework aims to contribute to achievement of net zero emission targets by 2045.

Regional Context

SEStran 2035 Regional Transport Strategy

SEStran 2035 Regional Transport Strategy was approved in 2023. The Strategy's vision is:

> *'A South-East of Scotland, fully integrated transport system that will be efficient, connected and safe; create inclusive, prosperous and sustainable places to live, work and visit; be affordable and accessible to all, enabling people to be healthier; and delivering the region's contribution to net zero emissions targets.'*

The Strategy identifies transport issues in the SEStran region, examining constraints and opportunities. It is based around four objectives:

- transitioning to a sustainable, low carbon transport system
- facilitating healthier transport options
- transforming public transport connectivity across the region
- supporting safe, sustainable and efficient movement of people and freight across the region.

The Strategy contains a suite of policies and actions to deliver these objectives under a series of overarching themes:

- shaping development and place
- delivering safe active travel
- enhancing access to and accessibility of public transport
- transforming and extending the bus service
- enhancing and extending rail services
- facilitating efficient freight movement and passenger travel
- reallocating road space on the regional and local network

- delivering seamless multi-modal journeys
- decarbonising transport
- reducing car kilometres
- working towards zero road deaths and serious injuries
- responding to the post-Covid-19 world.

SEStran Regional Bus Strategy Case for Change

The SEStran Regional Bus Strategy – Case for Change, published in 2024, 'presents a thorough examination of the current situation of the bus network in the region and what is needed to achieve the vision that is presented in the Regional Transport Strategy.'

The Case for Change highlights several issues with bus travel in the SEStran region as well as presenting opportunities for change. Some of the issues highlighted include:

- Some areas are not served by bus services or are poorly served
- There is a lack of competition with services and fares
- In some cases, bus is not an attractive mode choice due to delay and congestion
- Fares and ticketing can be complicated and expensive
- Lack of integration between operating companies and modes.

The Case for Change looks in detail at where the issues are policy related or where they are related to bus provision/supply as well as examining opportunities for change and constraints that might make change difficult. Its vision for a regional bus strategy is:

> To provide a high quality, affordable, accessible and available bus network for the whole region which is fully integrated with other forms of transport and increases passenger numbers and passenger satisfaction, to support the social, environmental and inclusive economic development of the region.

This work will be supported by the SESTransit project which is a regional collaboration that is looking at progressing STPR2 recommendation 12 on mass transit in Edinburgh and South East Scotland and is funded by the Bus Infrastructure Fund and managed by SEStran.

SEStran Regional Bus Strategy

Following the Case for Change, the SEStran Regional Bus Strategy is the finalised strategy for regional bus travel. The Strategy sets out why it is needed, including

regional population growth, rising car ownership and the diversity of settlement types in the region. It further explains the issues facing bus travel in the region, including:

- many regional bus services are Edinburgh-centric
- some markets are poorly served
- there is little true competition
- network delays and congestion reduce the attractiveness of the bus network
- bus users often perceive ticketing as being complicated and expensive
- most routes are operated on a commercial basis
- customer satisfaction varies
- instability of services
- lack of integration.

The Strategy's vision is

> *'To provide a high quality, affordable, accessible, and available bus network for the whole region which is fully integrated with other forms of transport and increases passenger numbers and passenger satisfaction, to support the social, environmental, and inclusive economic development of the region.'*

To help to achieve this vision, the Strategy has set out a series of policies and actions under three core policy areas: Improve Levels of Service, Improve Affordability, Improve Service Quality.

Under the core policy area of 'Improve Level of Service' the following policy has been developed:

> '*Move towards a regionally equitable level of service in terms of connectivity by settlement type, including travel between key towns in near-neighbour local authorities. This will need to recognise the resource limitations of local authorities, while accounting for the specific needs of communities.'*

The 'Improve Affordability' core policy area has developed five actions aimed at making bus use affordable:

- Fares and ticketing should be straightforward to understand, easily accessible, and ensure all users can identify and obtain the best value fare for their journey, regardless of interchanging between services, operators, or modes
- The Strategy supports greater consistency of fares and approaches to fares setting across the region
- The Strategy supports initiatives to provide free or lower cost bus travel for those in 'transport poverty'

- Ensure that concessionary fare schemes are equitable for both operators and eligible passengers, and that resources are targeted and allocated appropriately to ensure support is directed where it is most needed
- The Strategy supports measures to improve the competitiveness of sustainable transport affordability relative to car use and parking fees.

The core policy area 'Improve Service Quality' has eight distinct elements aimed at improving the quality of the bus network in the SEStran region:

- Network performance and stability
- Network identity
- Ticketing
- Information, customer service and feedback
- Interchanges and bus stops
- Vehicles and depots, and bus drivers
- Safety, security and inclusion
- Data and monitoring.

The Strategy examines the challenges and opportunities for the role of governance in delivering its policies and actions. It refers to the powers afforded to local authorities by the Transport (Scotland) Act 2019 to deliver bus services and of the benefits of collaborative working between SEStran and regional local authorities.

SEStran Go Forth Freight Study Case for Change

In 2021, SEStran published the updated findings of the Go Forth Freight Study Case for Change, a study that investigated existing freight movements in the SEStran area, including the role that road freight plays, as well as the potential environmental benefits and commercial viability of sustainable freight and goods movements. The Case for Change was followed by two subsequent appraisals that identified next steps:

- SEStran Go Forth Freight Study Preliminary Options Appraisal - the findings of the Preliminary Options Appraisal that identified a series of potential interventions that would help to encourage more sustainable and efficient freight movements
- SEStran Go Forth Freight Study Detailed Options Appraisal - the Preliminary Options Appraisal was followed in 2024 by a Detailed Options Appraisal that looked at the feasibility of three options, assessed using Scottish Transport Appraisal Guidance. The options appraised were:
    - use of Edinburgh Tram to carry freight
    - use of passenger trains to carry freight
    - multi user rail freight.

Transport Scotland has been undertaking a review of the final report on the Detailed Options Appraisal. On completion of the review, it will provide advice in line with its business case process, rail investment strategy and affordability. This will assist in the baseline understanding of infrastructure which will inform the next steps in implementing the recommendations in the Study.

Interim Regional Spatial Strategy

The interim Regional Spatial Strategy (RSS) for Edinburgh and South East Scotland City Region sets out a non-statutory approach to regional considerations as a framework to inform NPF4 and future LDPs. It supports the regional local authorities LDPs with a strategic overview. It draws from the work on the second Strategic Development Plan's strategy to meet projected housing growth. The RSS recognises that sustainable transport infrastructure is vital to enabling growth and development and that it must support the infrastructure first ethos of NPF4. Work on a formal RSS awaits the Scottish Government's regulations and guidance on RSSs.

The RSS details the challenges that the region faces – it sets out issues within each local authority area as well as detailing cross boundary issues. The key transport issues identified include:

- Economic renewal – while the region contains several significant business clusters and areas of industrial productivity, there are parts which have been on the periphery of the economic growth, suggesting the need for investment on key transport corridors
- Environmental improvement – discusses the varied environmental aspects of the region and the importance of green and blue spaces, both in terms of accessibility and improvement/enhancement.

The RSS sets out opportunities for the different areas of the region, namely Edinburgh city, the east, the south, Midlothian, the west and the north. Several transport related opportunities are highlighted for Edinburgh:

- Investment in decarbonised public transport systems and in active travel infrastructure is vital to reducing car use and achieving the objectives of National Transport Strategy 2 and STPR2
- A place-based approach to provision of infrastructure, land, finance, innovation and skills will contribute to acceleration of affordable housing
- Brownfield development opportunities will contribute to sustainable long-term regional growth.

Midlothian Local Development Plan

Midlothian Council's Local Development Plan was adopted in 2017. It has allocated various parcels of land for housing and employment adjacent to the border with

Edinburgh, particularly around the A701, A720 and A6106. In late 2025, a planning application to create a relief road at the northern end of the A701 near Straiton was submitted.

West Lothian Local Development Plan 2018

The West Lothian Local Development Plan 2018 has identified land for housing and employment close to the M9, A90 and A71.

East Lothian Local Development Plan 2018

The East Lothian Local Development Plan 2018 has allocated land for mixed use development on the border with Edinburgh, straddling the A1 and land for a new settlement of around 1600 homes at Blindwells between the A1, A68 and the City Bypass. In addition, there is a safeguard for a significant further development at Blindwells. City Region Deal has identified the case for this safeguard and produced an investment prospectus.

NHS Lothian Public Health Policy Paper

NHS Lothian's Public Health Policy Paper is focused on strengthening prevention in the health and care systems in Lothian. Its sets out extensive data on disease including occurrence and cause before detailing a series of interventions that should be prioritised. The Paper identifies transport as requiring priority action as it can be beneficial for health, in terms of providing opportunities for active travel but also negative due to effects such as air pollution.

The Paper sets out three key transport actions:

- Recognise the impact that affordable, healthy transport has on individuals' ability to stay healthy and access a range of local services (including health services) and ensuring that we design services to be located close to where people live, or be digitally inclusive, to reduce the need for people to travel, as well as working with local authority colleagues to ensure sustainable transport options are provided and promoted in relation to access to our service
- Recognise the impact that unsustainable travel behaviours can have on others health, including through air and noise pollution and road danger (NHS Lothian Public Health outlines that action should be prioritised for transport to provide opportunities for active travel which has a direct impact on health and that transport supports other building blocks of health, by providing access to public services and employment) as well as wider impacts on greenhouse gas emissions and climate change and commit to reduce the proportion of staff who travel by unsustainable means
- Consider the transport impact of the goods and services we procure.

Travelling to Health Appointments: A literature review

SEStran Travelling to Health Appointments literature review sets out an overview of evidence and policy context relating to how people travel to health appointments in the SEStran region. It is an early step in the development of a Transport to Health Strategy.

The review established the following baseline data:

- 2% of all journeys in the region are taken to access hospitals or other healthcare services
- Most journeys to GPs and hospitals in Scotland are by car
- Transport is frequently cited as a reason for missing healthcare appointments.

The review identified the following challenges in transport to health:

- poor transport connectivity options for many
- cost of transport
- additional barriers faced by disabled people
- organisational and policy related barriers.

To overcome the challenges the review identified the following opportunities:

- changes in policy – increased cooperation
- new digital transport technologies
- virtual provision of some services.

Local Context

Edinburgh Strategic Sustainable Transport Study Phase 2

Edinburgh Strategic Sustainable Transport Study Phase 2 (ESSTS2) was commissioned by City of Edinburgh Council to analyse the feasibility of future mass transit/tram routes on corridors to Granton and the southeast of the city. The study recommended three emerging route options for further consideration:

- Granton to the City Centre
- City Centre realignment
- Nicholson Square to Edinburgh BioQuarter
- Edinburgh BioQuarter to Newcraighall
- Edinburgh BioQuarter to Sheriffhall
- Edinburgh BioQuarter to Sheriffhall via Shawfair.

Between August and September 2025, the Council undertook public and stakeholder consultation on proposed new tram routes from Granton to Edinburgh BioQuarter.

When fully analysed, the results of the consultation will be presented to the Council's Transport and Environment Committee along with a Strategic Business Case in late 2026.

The Council is also exploring opportunities to create a mass rapid transit loop around the city using the existing route of the South Suburban Railway, existing tram lines and new infrastructure.

West Edinburgh Transport Improvements Programme

Partially funded by the Edinburgh and South East Scotland City Region Deal, the West Edinburgh Transport Improvements Programme (WETIP) has identified, and will deliver, bus priority and active travel improvements along the A8/A89 corridor between Broxburn and Gogar. WETIP follows on from the West Edinburgh Transport Appraisal, published in 2010, which identified transport interventions that would mitigate committed and allocated development in the west of Edinburgh amounting to around 13,000 new homes.

Interventions include development of the A8 as a strategic transport corridor with plans being developed to connect sustainable transport infrastructure as far east as Roseburn. Concept design of the A8 is currently being undertaken and to date, Maybury junction has been designed, Gogar roundabout is currently being redesigned (to take into account West Town and proposed new airport access road) and modelling is being done on Drumbrae roundabout. Modelling and design will continue through 2026 and into 2027 with work due to start in late 2027.

Delivery of WETIP is being funded through various sources including Bus Infrastructure Fund, Active Travel Investment Fund and developer contributions.

West Edinburgh Placemaking Framework

The West Edinburgh Placemaking Framework (WEPF) is non-statutory planning guidance that articulates a new vision and will shape the future development of West Edinburgh as required by Place Policy 16 in City Plan 2030.

City Plan 2030 identifies West Edinburgh as a significant urban extension to the city, supporting economic development opportunities within West Edinburgh whilst introducing a balanced mix of uses that promote healthy, sustainable lifestyles and a strong sense of place through the 20 minute neighbourhood principle.

The Masterplan informs development, supporting the delivery of City Plan 2030 through:

- Providing place-based planning guidance

- Supporting exemplary placemaking, with a particular focus on nature positive, green blue infrastructure, delivering net zero and living well locally, to establish a network of interconnected 20-minute neighbourhoods
- Establishes Council expectations for the spatial development of West Edinburgh, which informs requirements for individual landholdings and component sites and the links between these
- Sets out strategic infrastructure requirements, promoting an 'infrastructure first' approach to transport, water/waste water, green blue network, education and health care infrastructure required to deliver the levels of development proposed
- Further clarifies the basis for legal agreements to secure developer contributions and other obligations where these arise from developments
- Complements other Council initiatives, providing a basis for decision making and potential investment relating to strategic infrastructure and potential phasing of development
- Planning applications for significant Local, Major or National development within the WEPF area will be supported by suitable site masterplans, phasing and delivery plans and design parameters.

Towards West Edinburgh 2050: A Study to Inform Inclusive and Sustainable Growth

Towards West Edinburgh 2050 is a study to inform the future of West Edinburgh and the steps required to maximise its potential. Its aim is to understand constraints and considerations and gain a better knowledge of people and place to inform future actions to maximise inclusive and sustainable growth. It is based on sound evidence of the physical, environmental and social issues and continued collaboration and engagement.

Five interconnecting themes provide the basis for the study:

- Environment and Climate Change - a productive, environmentally rich, low carbon place
- Economic Growth - an area that grows Edinburgh's dynamic economy
- Resilient and Sustainable Places - distinctive and connected communities to live, work and visit
- Tackling Inequality - providing work, skills and opportunity
- Connectivity - a series of interconnected landscapes and neighbourhoods.

The study will be used to assist with the preparation of future policy and delivery plans for physical development, investment and infrastructure projects in the area. Towards West Edinburgh 2050 is a long-term informational document that sits alongside City Plan 2030 process yet considers the west area of the city beyond this into 2050. The LDP will need to consider whether or not any strategic allocations are needed in this area.

In terms of connectivity, the study details several transport interventions that are necessary to enable development in West Edinburgh. The study suggests that, crucially, development is contingent on these interventions to open up the area:

- All new development should be based on 20 minute neighbourhood principles linked to transport/mobility hubs
- Opportunities for a tram/mass rapid transit loop and green bridge over the City Bypass should be explored
- Active travel enhancements and improved crossings to A8 and A71 corridors and sites, including Ingliston junction
- Enhancements to north-south active travel routes and bus connections
- No major, new, strategic road building other than for access to development sites and West Edinburgh Transport Appraisal projects
- Proposed Almond Chord rail link between Dalmeny and Winchburgh
- Active travel enhancements and traffic management / calming at Maybury Road and improved crossings at the Maybury junction
- Consideration of Data Infrastructure in relation to connectivity and infrastructure

City Plan 2030 Transport Appraisal

A transport appraisal was undertaken to inform the role of transport in City Plan 2030. Transport planning objectives, based on CP2030 objectives, were developed:

- TPO1: Promote sustainable economic growth by facilitating developments which enable use of sustainable, inclusive transport choices
- TPO2: Minimise the need to travel to and from new developments, especially by car
- TPO3: Support physical and mental wellbeing by maximising the potential for development-related transport demand to be accommodated by active and non-polluting modes
- TPO4: Mitigate the adverse impacts of transport demand from new developments on existing networks.

Having established the transport planning objectives, the Transport Appraisal then examined three different scenarios:

- Assessment, using modelling and public transport and active travel accessibility, of transport issues that would occur if no City Plan 2030 developments took place
- Assessment of issues that would occur if City Plan 2030 developments were implemented

- Identification of measures that would mitigate additional problems caused by developments.

The Transport Appraisal examined the impacts of the more than 100 brownfield sites and five strategic sites which were considered for allocation as residential development in City Plan 2030. The conclusion was that the strategic sites, accounting for a capacity of around 13,000 residential units, could be accommodated with no substantial issues or network problems but that improvements to active travel and public transport networks would be required to minimise car use.

In terms of specific issues, the Transport Appraisal identified particular increases in traffic flows on the M9 Southbound on-slip at Newbridge Junction should development in City Plan 2030 evolve with no transport improvements. However, sustainable transport measures set out in the Plan, including West Edinburgh improvements, would be expected to mitigate the increased flows.

The Appraisal identified a series of specific mitigation measures that could mitigate any impacts of development:

- maximum parking standards for cars, minimum standards for cycles
- electric vehicle charging provision
- car club provision
- access to public transport
- active travel routes
- cycle hire
- mobility hubs
- street design
- demand management
- parking controls.

City Plan 2030

City Plan 2030 sets out locations for new homes and businesses and ensures that the services and amenities needed for good quality of life, such as public transport, active travel, schools, healthcare and green space are in place. The aim of the Plan is to ensure that the planning of housing, employment and services addresses the need for net-zero development, resilience to climate change, quality places and green spaces, delivery of community infrastructure and job opportunities where people live and embeds a 20-minute neighbourhood principle at the heart of all places in Edinburgh. The Plan will achieve these aims through:

- delivery of a network of 20-minute neighbourhoods and embedding a place-based approach creation of connected, healthy communities
- maximising use of brownfield land

- setting out Place Policies, preparing Place Briefs and supporting Local Place Plans to help create sustainable communities.

It has adopted an ‘infrastructure first’ approach, directing new development to where there is existing infrastructure or it can be made available. Where required to support new development, the Plan requires new and expanded community infrastructure including schools, healthcare, sustainable transport, energy, and waste to support its spatial strategy.

City Plan 2030 features a spatial strategy that sets out how growth in Edinburgh will be delivered over the life of the Plan. The mapping underpinning the spatial strategy shows tram line safeguards, active travel safeguards, public transport proposals and potential sites for mobility hubs.

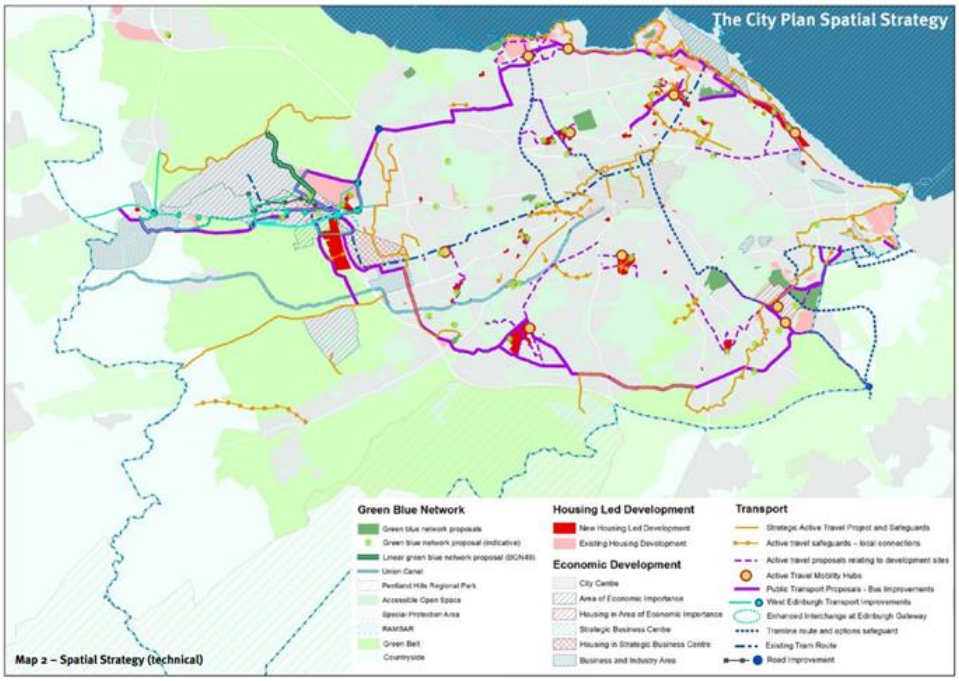


Figure 01a.3: The City Plan 2030 Spatial Strategy

The Plan has four outcomes that will help to deliver the spatial strategy aims and national, regional and local policy drivers:

- A sustainable city which supports everyone’s physical and mental wellbeing
- A city where you don’t need to own a car to move around
- A city which everyone lives in a home they can afford
- A city where everyone shares in its economic success.

To achieve the goal of creating a city where you don’t need to own a car to move around, the Plan will:

- Create streets and public spaces for people over cars and improving and expanding sustainable public transport
- Utilise a spatial strategy that directs growth to brownfield sites where there is good public transport
- Manage travel demand and promote public transport to reduce transport emissions and avoid adding to congestion
- Incorporate elements of actions from the City Mobility Plan, Edinburgh Sustainable Strategic Transport Strategy and Strategic Transport Projects Review 2 that support public transport.

These actions are supported by the Transport Appraisal of the Plan which sets out transport infrastructure actions required to deliver the Plan, as well as any transport issues (and solutions) resulting from the policies in the Plan.

There are more than 100 policies in City Plan 2030 that will ensure that development will deliver the Plan, spread across 5 themes:

- Place
- Environment and Design
- Housing
- Infrastructure and Transport
- Economy.

Of the 22 policies under the theme of Infrastructure and Transport, 15 are directly or indirectly concerned with transport, ensuring that development in Edinburgh supports the City Mobility Plan's ambition to shift car trips to more sustainable modes:

- Policy Inf 1 – Access to Community Facilities
- Policy Inf 2 – Loss of Community Facilities
- Policy Inf 3 – Infrastructure Delivery and Developer Contributions
- Policy Inf 4 – Provision of Transport Infrastructure
- Policy Inf 5 – Location of Major Travel Generating Development
- Policy Inf 6 – Cycle Parking
- Policy Inf 7 – Private Car Parking
- Policy Inf 8 – Design of Car Parking
- Policy Inf 9 – City Centre Public Parking
- Policy Inf 10 – Cycle and Footpath Network
- Policy Inf 11 – Public Transport Proposals and Safeguards
- Policy Inf 12 – Park and Ride
- Policy Inf 13 – Road Network Infrastructure
- Policy Inf 14 – Rail Freight
- Policy Inf 15 – Edinburgh Airport Public Safety Zones.

An extensive series of specific proposals sets out where and how the Plan will deliver its policies:

- Active Travel Strategic Projects and Safeguards
- Active Travel Proposals Relating to Development Sites
- Active Travel Safeguards – Local Connections
- Public Transport – Orbital Bus Route and Improved Bus Connection
- Public Transport – Tram Route Proposal and Option Safeguards
- West Edinburgh Transport Improvements
- Road Improvements and Safeguards
- Public Transport – Other Safeguards.

City Plan 2030 Developer Contributions and Infrastructure Delivery Guidance

City Plan 2030 Developer Contributions and Infrastructure Delivery Guidance interprets and implements City Plan 2030 Policy Inf 3 Infrastructure Delivery and Developer Contributions and NPF4 Policy 18 Infrastructure first. It is used as policy to determine planning applications including the provisions to include legal agreements requiring contributions towards delivering infrastructure associated with development.

It provides the mechanism for securing financial contributions towards the cost of delivering necessary infrastructure interventions where it is not possible or reasonable for development to directly deliver infrastructure.

The Guidance is divided into five parts – part one covers:

- General principles of managing infrastructure delivery, including the cumulative contribution approach
- What type of infrastructure is covered in the Guidance, what development types apply to each and if there are any exceptions
- The relationship with City Plan 2030's delivery programme
- How the guidance can be reviewed
- Viability, funding mechanisms, and legal agreements including indexation and repayments.

Part three of the Guidance details aspects of how it deals with transport, including:

- Principles of cumulative approach
- Evidence base
- Summary of the transport contribution zones
- Overview of approach to delivery and contributions of shared mobility, traffic orders, tram and bus service infrastructure

- Appendices 2 – 9 of the SG provide the details of contribution zones, relevant contributing sites and per unit rates.

Where the cumulative impact of more than one development necessitates a shared intervention, the guidance sets out the Council's approach to cumulative contribution zones. Contribution zones are identified and apply to infrastructure proposals where it either:

- Mitigates the impact of more than one site and the cumulative impact of more than one development requires a combined solution to mitigate their impacts, or
- Where the infrastructure proposal cannot be reasonably delivered directly by a developer (for example it requires an action on third party land) and
- Allows the calculation of the proportional cost of the impact of development when that intervention also serves the wider, existing community within the zone.

City Plan 2030 Delivery Programme

City Plan 2030 Delivery Programme, published in 2025, is an update to the Action Programme published with the proposed City Plan 2030 in 2021. The Programme sets out the extensive list of actions required to enable delivery of the policies and proposals within City Plan 2030. The list of actions includes detail on how each action is to be delivered and timescale for delivery. Transport related actions are set out in the Programme in eight tables:

- Table 2 Active Travel Strategic Projects and Safeguards
- Table 3 Active Travel Proposals Relating to Development Sites
- Table 4 Active Travel Safeguards Local Connections
- Table 5 Public Transport Proposals and Safeguards
- Table 6 Public Transport Other Safeguards
- Table 7 West Edinburgh Transport Improvements
- Table 8 Road Improvements and Safeguards
- Table 12 Site specific Transport Actions for Existing Housing Proposals.

City Mobility Plan 2021-2030

Edinburgh's local transport strategy, City Mobility Plan 2021-2030 (CMP) was approved in 2021. The CMP sets a strategic framework for the sustainable, safe, efficient and inclusive movement of people, goods and services into and around Edinburgh whilst seeking to address the associated environmental and health impacts. It supports the City Plan 2030's strategy which seeks to direct development to the most sustainable locations. It will continue to inform other emerging city oriented strategic plans and projects, such as the City Sustainability

Strategy 2030, and it sets the strategic framework for the detailed actions which help to prioritise investment in mobility across the city.

The CMP also sets the context for partnership working with local, regional and national stakeholders and for continuing engagement with the communities of Edinburgh. The CMP contains a series of objectives and policy measures under the themes of People, Movement and Place that will help to achieve its vision. The policies in the City Mobility Plan can be found here.

City Mobility Plan Implementation Plan

The delivery mechanism for the actions in the City Mobility Plan is the City Mobility Plan Implementation Plan which includes more than 100 actions. The Implementation Plan is updated every two years as part of the City Mobility Plan's monitoring schedule and sets out the following information:

- Key actions by 2025, 2030 and post 2030
- Main responsible body or bodies
- Overall scale of cost (likely or as known at this stage)
- Current funding status
- Main/potential funding sources
- Geographic coverage/approach to prioritisation
- Project type.

Prioritisation of delivery of actions in the CMP's Implementation Plan is dealt with in the Capital Investment Programme. A range of factors determine which projects are prioritised, including how projects contribute towards CMP objectives, how deliverable projects are, cost and availability of funding. The Capital Investment Programme Prioritisation Programme can be found here.

City Mobility Plan Implementation Plan - Active Travel Actions

Active Travel Actions in the City Mobility Plan Implementation Plan aim to improve walking, wheeling and cycling in Edinburgh in order to make Edinburgh a city where walking or wheeling is the natural first choice for the shortest journeys and where everyone, including children, has the freedom to cycle safely, whatever their destination, at all times of day. They further aim that cycling is seen as a natural choice for local and longer trips around the city, with safety no longer seen as a significant barrier.

While active travel actions respond to national policies and frameworks which seek to boost levels of active travel and physical activity in Scotland, they have been designed to help deliver the vision, objectives and policies set out in the City Mobility Plan (CMP).

Our Future Streets

Our Future Streets is the Council's Streetspace Allocation Framework that aims to ensure that limited space on Edinburgh's streets is used in the most efficient way possible while helping to achieve the objectives of the City Mobility Plan and addressing the climate emergency. The principles of the Framework seek to achieve a balance between the demands on space, by prioritising place, walking/wheeling, cycling and public transport over private motorised traffic and parking. It uses a place-based approach to delivery of transport projects ensuring that addressing all of the issues on the streets concerned is a starting point.

The place-based engagement for the Evidence Report supported active travel but both the general public and children and young people wanted to see more dedicated, connected and accessible walking routes and particularly cycle routes.

Core Paths Plan

Edinburgh's Core Paths Plan was originally developed in 2008 and responds to Part 1 of the Land Reform (Scotland) Act 2003. It provides details of all 21 of the core paths in Edinburgh which form the entire network. Plans are underway for it to be reviewed and updated.

City Mobility Plan Implementation Plan - Public Transport Actions

The Public Transport actions set out in the City Mobility Plan Implementation Plan aim to ensure that Edinburgh is connected by a safe, efficient and more inclusive net zero carbon public transport system that is accessible to all.

The Plan includes a series of workstreams that have been designed to help to deliver the vision, objectives and policies set out in City Mobility Plan 2030 and to contribute to achieving the priorities and commitments made in the Council's business plan. The actions respond to specific national policies and frameworks which seek to encourage more travel using sustainable modes in Scotland including the National Transport Strategy and second Strategic Transport Projects Review both of which highlight the need for investment in public transport.

The actions reinforce the enhancement and growth of Edinburgh's public transport as the most efficient means of moving large volumes of people. This will help Edinburgh to tackle climate change and ensure the sustainable economic growth of the city as well as being key to helping deliver Edinburgh's target to achieve net zero carbon emissions by 2030.

At the core of the public transport actions is a recognition that the public transport system is part of the integrated solution to address the movement of people and goods to, from and within the city.

In terms of the place-based engagement for the Evidence Report, the general public found it relatively easy to get around by public transport but this depended on where they lived within the city. There was support for better bus connectivity around the city rather than city centre focussed routes. Children and young people were positive about public transport especially the buses and also supported a north-south tram route which has positive implications for future use.

Electric Vehicle Infrastructure Strategy and Expansion Plan

The Council has developed an Electric Vehicle Infrastructure Strategy and Expansion Plan to help further the roll-out of electric vehicles (EV) charging infrastructure across the city to meet growing demand, with a strong emphasis on a commercial partnership approach to deliver accessible and equitable EV charging provision; particularly in areas where residents do not have access to off-street parking.

City Mobility Plan 2030 sets the policy framework for increased use of cleaner vehicles in Edinburgh. Policy measure Movement 32 aims to encourage the switch to cleaner vehicles by supporting the growth of EV infrastructure, including the development of a citywide charging network and monitoring progress in other low and zero emission technologies. In addition, policy measurement Movement 33 supports the transition to zero emission buses.

The Strategy and Expansion Plan must therefore support delivery and balance a number of City Mobility Plan objectives:

- Reduce harmful emissions from road transport
- Ensure that transport options in the city are inclusive and affordable
- Reduce vehicular dominance
- Maximise the efficiency of our streets to better move people and goods
- Increase the proportion of trips people make by active and sustainable travel modes.

Air Quality Action Plans

In compliance with Section IV of the Environment Act 1995, Edinburgh's Air Quality Action Plans (AQAPs) ensure that the Council and its partners work together towards meeting statutory air quality objectives but also, where practicable and feasible, to reduce local air pollution emissions across the city. This is consistent with the priorities of the national Scottish air quality strategy - Cleaner Air for Scotland 2

(CAFS2) - which provides national policy support for a precautionary public health approach to air pollution.

The AQAPs include several priorities, including that through collaborative working, wider strategic air quality action is implemented through existing policy areas. This includes strategic transport improvements, promotion of behaviour-change to reduce private vehicle use, promotion of low emission vehicles and controlling domestic, development-related and industrial emissions. In addition, the AQAPs ensure that placemaking, climate change and noise reduction plans are closely co-ordinated and aligned with those for air quality in order to maximise co-benefits.

To deliver priorities, the AQAPs contain actions which are relevant to land use planning and the local development plan process, including:

- Update planning guidance to incorporate a greater provision of electric vehicle (EV) infrastructure in new developments which was completed in September 2025 when updated Council parking standards for new developments were adopted
- Use UK APAS (Air Pollution Assessment Service) to investigate the impacts of City Plan development on air quality in the long term
- Ensure placemaking strategies and guidance including place briefs take account of air quality, especially considering the juxtaposition of land-uses in and around the Leith Docks*
- The need for some planning applications to include a Construction Environmental Management Plan*
- Set up a forum with the Council, housing developers, landowners, businesses and community to helps address the cumulative impact of development on environmental protection matters in/around certain areas*

* These actions are currently (in-part) in draft form in the Draft Salamander Street AQAP.

2030 Climate Strategy

Edinburgh's 2030 Climate Strategy was approved in 2021. It sets out the steps that Edinburgh will take to tackle the challenge of climate change and achieve the aim of becoming a net zero city by 2030. The Strategy is guided by seven core principles:

- Just transition
- Progressive policy
- Adapting to unavoidable climate change and preventing future emissions
- Reducing our global footprint
- Fabric first

- Electrification first
- Creating 20-minute neighbourhoods.

One of the Strategy's visions is that it will create resilient places and spaces for low-carbon living, underpinned by putting in place new planning policies that enable net zero, climate resilient growth through a new local development plan.

To achieve its aims of tackling climate change and achieving net zero by 2030, the Climate Strategy includes seven priority actions and a series of wider actions. These actions include measures that encourage increased net zero emission transport by:

- Investing in active travel
- Developing integrated public transport
- Decarbonising buses
- Improving local air quality
- Better management of the city centre
- Supporting public sector transition to electric vehicles
- Delivering electric vehicle infrastructure
- Engaging with citizens.

Climate Ready Edinburgh Plan 2024-2030

The Climate Ready Edinburgh Plan 2024-2030 is Edinburgh's second climate adaptation plan. It sets out available evidence showing how the climate is changing as well as the actions needed to ensure Edinburgh can adapt. The vision of the Plan is:

> Edinburgh will be a thriving, fair, resilient city and region where people, communities, business and nature flourish in a changing climate.

The Plan is guided by nine overarching priority themes:

- Planning and the built environment: actions to help mitigate the effects of climate change by making our buildings and infrastructure more resilient
- Water management: actions to tackle flooding and the associated impacts from severe weather events
- Coastal adaption: actions to manage sea level rises and the impact to our coastline and surrounding communities
- Sustainable transport: actions to support a well-connected resilient city
- Safeguarding and enhancing our natural environment: actions that will support our natural environment and biodiversity
- Community, health and wellbeing: actions to support and build the resilience of our communities and health services, taking a 'people first' approach and ensuring a just transition for all

- Economy and culture: actions to increase business resilience, skills and job opportunities in adaptation and build up the resilience of our arts, festivals and events
- Building understanding of climate risk: actions to continue to ensure our understanding of how the climate is changing and the impacts of this to the city are based on the latest climate science
- Governance and investment: actions to drive delivery and partnership working.

The Plan includes a series of around 140 actions within the nine themes that will help to deliver the Plan. Several themes and associated actions are particularly pertinent to planning and transport, including:

- Planning and the Built Environment contains actions that aim to ensure that climate change adaptation is embedded in planning policy and guidance and actions that suggest planning should deliver climate resilient buildings and infrastructure
- Sustainable Transport includes actions that will build resilience into Edinburgh's transport network and infrastructure, actions that embed adaptation into the City Mobility Plan and actions that build resilience into the city's road network.

City Mobility Plan Implementation Plan - Road Safety Actions

Under Section 39 of the 1988 Road Traffic Act, local authorities have a statutory responsibility for road safety. Road Safety actions in the City Mobility Plan Implementation Plan set out how the Council will work with partners including Transport Scotland, Police Scotland and the Scottish Fire and Rescue Service, to work towards Vision Zero and the provision of a modern road network where all users are safe from the risk of being killed or seriously injured.

Road Safety actions utilise the Safe Systems approach to road safety management. This approach, which is at the heart of Scotland's Road Safety Framework, is based on four key principles:

- People make mistakes and that can lead to collisions on the network
- The human body has a limited physical ability to tolerate forces caused in collisions before bodily harm occurs
- People have a responsibility to act with care and comply with traffic laws, however that responsibility is shared with those who design, build, manage and maintain roads and vehicles to prevent collisions resulting in serious injury or death and provide post-collision care
- All parts of the system must be strengthened to increase their effects, meaning all road users are protected, even if one part fails.

The main goal of Safe Systems is to ensure that these mistakes do not lead to a collision; or should a collision occur, it is sufficiently controlled to not cause a death or a life-changing injury.

Transport Asset Management Plan

In line with the other local authorities in Scotland, City of Edinburgh Council supports the Society of Chief Officers in Scotland (SCOTS) Roads Asset Management project in producing a common framework for Road Asset Management Plans (RAMP). The Council has developed and extended its RAMP to include additional transport asset groups and created a Transport Asset Management Plan (TAMP). The assets considered within a traditional RAMP comprise carriageways, footways, structures, street lighting and traffic management systems. However, Edinburgh's TAMP also includes cycling infrastructure and park and ride sites.

The purpose of the TAMP is to establish future maintenance and management of the overall road network and to set out options considered to take forward the management of the Council's transport assets. The TAMP records the Council's plans for the maintenance of the road asset. The "road asset" comprises of carriageways, footways, structures, street lighting and traffic management systems.

Edinburgh's TAMP supports the achievement of the measures set out within the Council's 2030 City Plan, City Mobility Plan and the Council Business Plan 2023/2027 and is consistent with the Council's corporate approach to asset management.

City Mobility Plan Implementation Plan - Parking Actions

Parking actions set out in the City Mobility Plan Implementation Plan aim to discourage unnecessary car journeys by promoting sustainable alternatives and improving conditions for other road users whilst making parking and loading easier for essential vehicle journeys. They support the Council's strategic approach to parking and kerbside management, recognising its importance as the critical demand management component of Edinburgh's overall transport strategy, aiming to control traffic levels and informing travel choices through restrictions and associated enforcement.

The package of parking actions aims to improve and contribute to a future transport system that is safe, healthy and sustainable, whilst enabling parking and loading opportunities for residents and businesses.

Physical Activity and Sport Strategy for Edinburgh 2024 to 2025

The Physical Activity and Sport Strategy for Edinburgh 2024 to 2034 sets out how the Council will work together with key partners, the sector and local communities over the next ten years to increase the number of people who participate in physical activity and sport. The Strategy's vision is:

> *'An Edinburgh where everyone enjoys the benefits of an active life.'*

To achieve this the Strategy has five priorities:

- Active Partnerships
- Active People
- Active Places and Spaces
- Active Places of Learning
- Active Promotions

Of particular relevance to development planning is the provision of active places and spaces. While transport plays a key part in physical activity and improved health through promotion of active and sustainable transport, the provision of public recreational spaces through planning is equally important.

Edinburgh Children's Services Plan

The Edinburgh Children's Services Plan 2023/26 sets out a framework for delivering high quality, integrated services tailored to meet the needs of children and families. Its vision is that:

> *'Edinburgh's children and young people enjoy their childhood and achieve their potential.'*

In trying to ensure that children and young people have access to healthy environments, the Plan aims to develop a partnership approach to place and planning so that children's voices are included in decisions about their environment. This includes providing the transport links and infrastructure that enable access to the places they need.

Travel Patterns and Behaviour

Travel patterns and behaviour, how people who live in, work in and visit Edinburgh choose to travel, is based on a wide range of factors. Edinburgh has a city centre core but the majority of the population is spread across the entire Council area. Edinburgh is the dominant regional employment centre in the southeast area, accounting for around 45% of all commuting trips. Public transport within the city is relatively comprehensive with a good bus network and evolving tram network. Public transport into/out of Edinburgh is comprised of bus routes and train services into all

of the neighbouring local authority areas: Midlothian, East Lothian, West Lothian and Fife. The public transport services, allied with active travel infrastructure throughout the city make it easier for residents and visitors to choose modes of transport other than the private car.

The COVID-19 pandemic has had a significant impact on travel patterns, especially in relation to how and when people travelled and particularly on levels of public transport and driving. Travel restrictions imposed during the pandemic resulted in decreases in car kilometres on Edinburgh's roads and increases in walking, wheeling and cycling, however public transport suffered a significant downturn in patronage.

While bus and tram patronage continues to recover, bus patronage is still lower than pre-pandemic levels, however tram patronage has increased. In 2025, more than 124 million passenger journeys were made on Lothian Buses, around 4% lower than in 2019. In the same period, tram patronage increased by 68% from 7.5 million journeys to 12.5 million. This was due in part to the extension of the line to Newhaven.

According to the Scottish Transport Statistics the most common mode of travel in Edinburgh in 2023 was walking at 35%, followed by car as driver at 29%, bus was at 18% and by bicycle at 7%.

There was a 3% reduction in the number of car kilometres driven on Edinburgh's roads between 2019 and 2024. In 2019, car and taxi accounted for 1.53 billion kilometres driven on Edinburgh's roads. While the number dropped dramatically during the pandemic, levels are now similar to pre-pandemic levels with 1.48 billion kilometres driven in 2024. However, the recent increase in car kilometres has not increased in line with population growth in Edinburgh. While the population increased by more than 4% between 2019 and 2024, there were 3% fewer car kilometres driven on Edinburgh's roads.

Travel to work

The main source of data showing how people travel to work is the 2022 Census, however this was undertaken during the pandemic period. It showed that 97,689 (39%) Edinburgh residents were working mainly from home with 62,289 (25%) residents mainly driving to work.

Mode	Total	Percentage
Mainly work from home	97,689	39.4
Car/van as driver	62,829	25.3
Bus/coach/minibus	37,543	15.1
On foot	30,212	12.2

Bicycle	9,618	3.9
Passenger in car or van	4,248	1.7
Train	3,110	1.3
Tram	1,195	0.5
Taxi/private hire	930	0.5
Powered two-wheeler	551	0.4

Figure 01a.4: Travel to work

Another useful source of data is the Scottish Household Survey. While it has a smaller sample size than the Census with 280 respondents in Edinburgh in 2024, it is undertaken annually. The results from 2024 show similar levels of respondents driving at 28%, as shown in the census but higher levels of walking at 23%, cycling at 10% and public transport at 34%.

Travel to school

Modal split for travel to school is obtained through an annual Hands Up Survey undertaken in schools. The most popular mode of travel to school in 2024 was walking, 48.6% of respondents, followed by travel by car at 17.5%, bus at 11.8% while 5.5% cycled to school.

The total percentage who travelled by active modes in 2024 was 59.8% compared to 18.3% who travelled to school by private motorised modes (car or taxi).

	Percentage	
Mode	**2019**	**2024**
Walk	49.2%	48.6%
Cycle	7.0%	5.5%
Scooter/skate	7.8%	5.7%
Park & stride	10.3%	9.3%
Driven	17.4%	17.5%
Bus	7.5%	11.8%
Taxi	0.5%	0.8%
Other	0.3%	0.8%

Figure 01a.5: Travel to school

Travel to school data is also available from the annual Scottish Household Survey, which had a sample size of 150 in 2024. Travel by bicycle at 6%, is similar to that shown in the Hands Up Survey, however walking at 68% and bus at 13% are higher while car at 12% is lower than in the Hands Up Survey.

Car ownership

Of the 238,944 households in Edinburgh, more than 37% have no access to a car. This is 11% more than the Scottish national average of 26%. It is worth noting that there are spatial variations in car ownership levels across the city. While there are various reasons for Edinburgh's levels of car ownership and the spatial variations, it reflects the choice of transport options available to residents.

Number of cars available	No of households	Percentage of all households
No car	90,079	37.7
One	105,540	44.2
Two	36,111	15.1
Three	5,606	2.4
Four or more	1,618	0.6
Total	**238,944**	

Figure 01a.6: Car availability per household (source: Census 2022)

Population

Travel patterns in Edinburgh must be assessed against population growth. According to National Records of Scotland, Edinburgh's population has grown from 485,270 to 530,680 in the 10 years since 2014, an increase of 9%. However, the data emphasises that Edinburgh has an aging population. In the same period, there was a 16.3% increase in those aged 65 to 74 and a 14.3% increase in those aged 75 and over.

The city's population growth is forecast to continue with an estimated 7% increase of 37,667 to 2034. By 2040, the population is projected to be around 578,581, an increase of 9% on 2024 levels.

Infrastructure, Capacity, Availability in Edinburgh

Active Travel

Active travel infrastructure in Edinburgh is guided by City Mobility Plan 2030 and the Active Travel Action Plan. In addition, the Core Path Plan sets out the Council's policy on core path provision and management.

Since 2010 around 130 kilometres of footpaths/cycleways have been upgraded or installed. Upgrades have involved new lighting, smoother surfaces and improved drainage. In addition, new routes with safe crossing points and route signage have been created.

During the pandemic, more than 35 kilometres of routes for cycling were installed to provide safe ways for people to move around the city when public transport was not an option. These included protected cycle lanes and streets closed to motor traffic, many of which have remained in place.

In 2024, Edinburgh's first major segregated cycle route, the City Centre West to East Link, which runs along a main road corridor west of the city centre, was completed in March 2024. An active travel route between Roseburn and Union Canal was completed and opened in December 2024.

Edinburgh has 2,249 kilometres of footways, footpaths and cycleways including 312 kilometres of cycle network and 284 kilometres of core path network.

There are more than 4,300 publicly accessible cycle parking spaces in Edinburgh and continued delivery of secure, on-street cycle storage for residents of high-density housing will result in 380 hangers by 2026. A winter maintenance programme ensures that some key sections of the traffic-free path network are gritted, making cycling all year round easier.

The Edinburgh Design Guidance, which was updated in 2025, details what the Council expects developers to consider when submitting planning applications including how to layout streets that support sustainable and active travel and reduce car dominance. Edinburgh Street Design Guidance (ESDG) was introduced in 2010. The ESDG is a suite of detailed factsheets that advises designers on how to design public space that encourages walking, wheeling, cycling and public transport. Design of place is considered in detail in Topic 14 Design, quality and place.

Since 2016, 10% of the Council's annual transport budget has been spent on cycling infrastructure. The Council also spends 30% of its carriageway and footway renewals budget on pavement renewals. Investment priorities are guided by the City Mobility Plan's Implementation Plan which includes more than 100 actions from various action plans including the Active Travel Action Plan.

In addition, there are around 50 schemes set out in the City Mobility Plan Capital Investment Programme that will improve infrastructure for active travel, including improvement of cross boundary links to neighbouring local authorities. The schemes set out in the Capital Investment Programme can be found here.

The Proposed Plan will need to support delivery of the Council's transport objectives by exploring what could assist in delivering the 50 active travel infrastructure schemes set out in the City Mobility Plan's Capital Investment Programme.

The transport appraisal that will be required for the Proposed Plans will be factor in how it considers active travel infrastructure, looking to ensure that it supports Council proposals.

The Proposed Plan must consider existing active travel safeguards and examine where new safeguards are needed in conjunction with the Council's programmed and planned active travel schemes. It will also look at where existing and planned infrastructure offers opportunities for allocation of sites in the context of the outcomes of the transport appraisal.

Public Transport

Public transport moves more people around Edinburgh than any other mode. The City of Edinburgh Council has two Arms Length External Organisations (ALEOs), Lothian Buses Limited and Edinburgh Trams Limited, both of which are integrated under the umbrella of Edinburgh Transport Holdings Ltd and a single Chief Executive. The City of Edinburgh Council is the sole (100%) shareholder of Edinburgh Trams and the majority shareholder in Lothian Buses. East Lothian, Midlothian and West Lothian Councils each hold a minority shareholding in Lothian Buses.

There is a broad range of bus services that operate in the Edinburgh and the surrounding region. Express services, including regional express services typically run on set routes, have faster schedules, limited stops and offer mass passenger capacity. There are plans to introduce Bus Rapid Transit into and out of Edinburgh, including through SEStransit and West Edinburgh Transport Improvement Programme. At the other end of the spectrum, Community Bus Services are flexible, less focused on mass transit and typically cater for unmet local transport demands. Other bus operations include regular or local services (i.e. non-express services), sight-seeing tours, smaller hopper buses and school buses.

Lothian Buses is the main provider of bus services in Edinburgh and Midlothian. Subsidiary companies of Lothian Buses include Lothian Country serving Queensferry and West Lothian and East Coast Buses serving the East Lothian area. Stagecoach operates a range of express services from Fife to the city centre, with the majority calling at Ferrytoll Park and Ride. JET747 also provides a service from Halbeath Park and Ride, Inverkeithing railway station and Ferrytoll to Edinburgh Airport. In September 2022, McGill's Bus Services acquired the operations of First Scotland East from the FirstGroup. The company rebranded as McGill's Scotland East, but also trades as McGill's Midland Bluebird and McGill's Eastern Scottish. Borders Buses provides a range of services across the Scottish Borders and into Edinburgh. Key routes include the X62 from Galashiels / Peebles and the 253 from Berwick-upon Tweed. Regional coach services are provided by Citylink, Ember, National Express and Flixbus. Smaller local operators include Prentice, Edinburgh Coach Lines and E & M Horsburgh.

Figure 01a.7: Bus service frequency in Edinburgh

Edinburgh Trams provides a service between the city centre and the airport with an extension to Newhaven having opened in Spring 2023. Consultation on three options for future expansion of the network was undertaken between August and September 2025:

- Granton to the City Centre
- City Centre to Edinburgh BioQuarter and Royal Infirmary of Edinburgh
- Potential extension to Midlothian and East Lothian.

The consultation involved an online and paper survey, 18 public events, meetings with a range of stakeholders and a market research exercise. When analysed, the results of the consultation will be presented, alongside a Strategic Business Case, to the Council's Transport and Environment Committee later in 2026.

In 2025, 119 million passenger journeys were made on Lothian Bus services. While this was lower than 2019 pre-Covid 19 levels, the number of journeys has continued to rise since the end of the pandemic. Partly due to its extension to Newhaven in 2023, tram patronage is significantly higher than pre-pandemic levels, with 12.5 million journeys being made in 2025.

In terms of future growth, the Council's Public Transport Action Plan has aimed to be consistent with the City Plan 2030 spatial strategy as illustrated in Figure 1a 3.

Generally, growth is centred around brownfield sites where typically high public transport provision already exists but further local improvements may be needed. In recent years, major new development areas have included the City Centre, West Edinburgh, Waterfront and the South East. Employment growth has been centred around Leith Docks, Edinburgh BioQuarter, Heriot-Watt and Newbridge with focus also turning towards forthcoming development in West Edinburgh. In these locations, a more significant improvement in public transport is required to encourage behaviour change, including to destinations away from the city centre.

Collaborative working with the Scottish Government and the context of the National Transport Strategy 2 and the Strategic Transport Projects Review 2 underpin the opportunities for progress to be made to support better connectivity and access to jobs across the region whilst also supporting transition to net carbon zero movement. City Plan 2030, together with the City Mobility Plan 2030 and related strategies are major influences on the delivery of sustainable transport modes alongside national and regionally focused projects. This includes committed City Region Deal funding for the West Edinburgh Transport Improvement Programme and Bus Infrastructure Funding to help address public transport issues across the city and region.

Work to date that has been funded through sources including Bus Infrastructure Fund and City Region Deal has included:

- Installation of new bus lanes on: A8, A89, Kamies Crossroads, Duddingston Park South, A70, A90 and A1
- Installation of a bus lane camera on Lanark Road (A70)
- Installation and configuration of priority for buses at traffic signals at 30 locations across the city
- Installation of new traffic signals on exit of Hermiston Park and Ride giving priority to bus
- Upgraded Queue Management System on A90 linked to new bus lanes
- Business case work including an approved Strategic Business Case for key radial corridors linking Edinburgh and the Region plus two orbital routes. (see Figure 1a 5 below)
- Additionally, three follow-on outline business cases have been initially progressed for A71, A90 and A772
- Completion of Feasibility Studies for: Slateford Road, A90/M90, A702 Morningside and Comiston Road, Fairmilehead, and Kirkliston High Street.

Bus Infrastructure Funding is being further used to examine gaps in regional public transport connections and to improve infrastructure for regional and express services, including, in addition to those listed above, connections from the west along the A8 corridor.

The City Mobility Plan's Capital Investment Plan's prioritisation programme includes an extensive list of public transport projects which have been identified as either active or feasible to be progressed including:

- Granton Waterfront Phase 1 Public Transport Corridor
- 7/7/7 bus lanes
- Turnhouse Road bus gate
- Rolling programme of bus stop improvements
- Enhancement of real time information
- A70 Slateford Road signals review, bus stop optimisation and bus lane camera enforcement
- A71 Dalmahoy to Dalry bus priority measures
- Cross boundary bus/active travel corridor – East Lothian and Midlothian
- A701 bus priority measures
- A90 Burnshot off-slip bus gate
- A7/772 bus priority measures
- A90 Queensferry to Queensferry Street bus priority measures.

At a policy level, there is a coherent policy framework from NPF4 and NTS2 at the national level through to STPR2. The SEStran 2035 Regional Transport Strategy, and city and regional funding from Transport Scotland's Bus Infrastructure Fund across local authorities, ensure collaborative and aligned working at a regional level. This means that future public transport networks should complement and align with the recommendations within Transport Scotland's second Strategic Transport Projects Review (STPR2) for Edinburgh and South-East Scotland Mass Transit.

A mass transit system for the Region would provide more public transport options for cross-boundary travel, reducing the need to make unnecessary changes between services, leading to lower journey times. It would improve region wide connectivity and encourage a switch from car to public transport and other more sustainable travel options. The system would include cross-boundary routes along key corridors within and around Edinburgh, as the main population and economic area of the region. The primary purpose would be to facilitate end-to-end sustainable transport journeys. The introduction of new regional interchanges would also form part of the mass transit system.

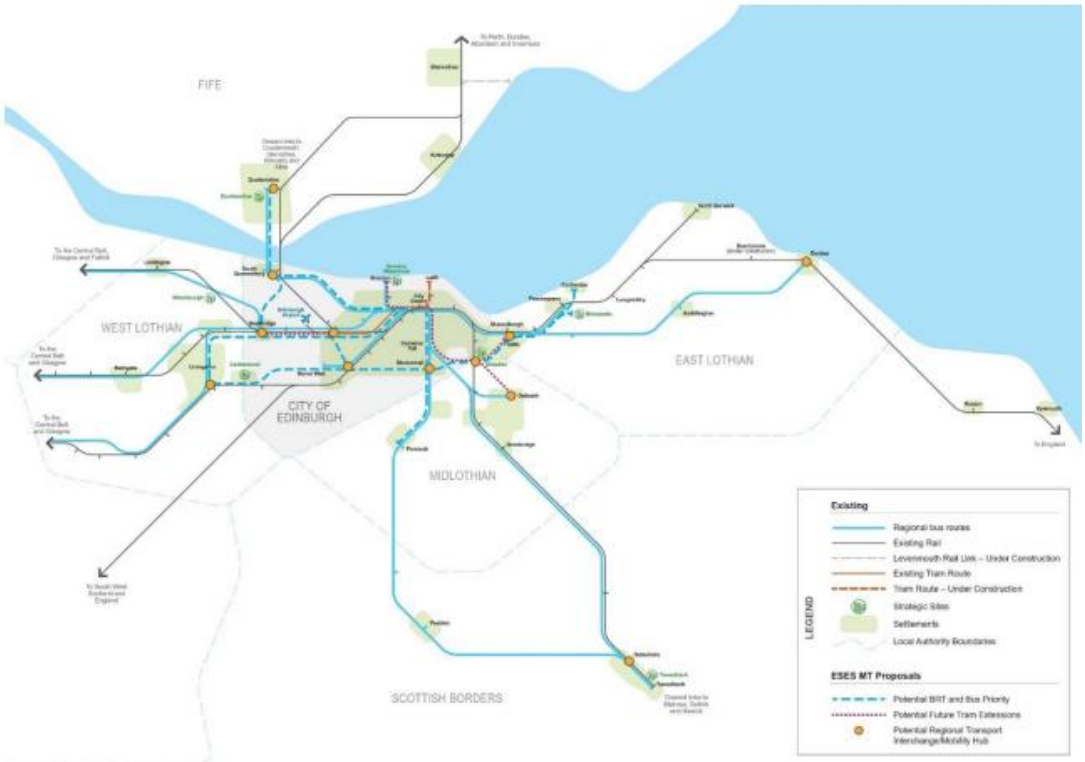


Figure 01a.8: Edinburgh and South East Scotland Mass Transit (source: STPR2 Recommendation 12)

City of Edinburgh Council is working on a Coach Plan that will ensure coach passengers are able to access the city with minimum impact on other street users. The Plan, which is being developed under the guidance of Our Future Streets, will address coach parking (including events parking), drop-off and pick-up and coach routing. It is anticipated that the Plan will be finalised by mid-summer 2026.

While it is unlikely that public transport infrastructure needs are identified through land use planning, this must be continuously monitored during the preparation of the Proposed Plan so it considers any emerging needs, for example new park and ride sites.

As well as considering new public transport safeguards, the Proposed Plan will need to consider continuation and enhancement of safeguards in City Plan 2030. These include orbital bus and improved bus connections around the edge of the city, improvements that form part of WETIP and extensions to the tram both north and south. As well as WETIP, the Proposed Plan will need to consider SEStransit proposals in terms of potential development opportunities.

The Proposed Plan will identify where development can be accommodated in areas already well served by public transport. Where potential sites are not well served, the Proposed Plan should consider whether it might make public transport viable. This

may include consideration of use of developer contributions to help services become established prior to completion of build out of sites.

Rail

There are 12 rail stations in Edinburgh which accounted for more than 28 million passenger movements in 2024/25. This was an increase of more than 7% on the previous year with only one station seeing a decrease in entries and exits. The busiest stations in Edinburgh are Waverley and Haymarket which account for 92% of all passenger movements in the city. Waverley is the busiest long-distance station in Scotland and caters for several operators, including Scotrail, LNER, Avanti, Cross Country, TransPennine Express and Lumo.

Station	Entries/Exits 2023/2024	Entries/Exits 2024/2025	Annual increase
Waverley	21,307,916	22,755,164	6.8%
Haymarket	2,981,170	3,334,408	11.8%
Edinburgh Park	522,354	558,812	7%
Dalmeny	441,074	488,872	10.6%
Edinburgh Gateway	250,388	254,676	1.7%
Newcraighall	225,374	233,352	3.5%
South Gyle	206,294	220,542	6.9%
Brunstane	162,702	156,782	-3.6%
Curriehill	109,626	124,218	13.3%
Slateford	65,584	71,928	9.7%
Wester Hailes	57,938	62,844	8.5%
Kingsknowe	33,176	34,444	3.8%
Total	**26,330,420**	**28,296,042**	**7.3%**

Figure 01a.9: Entries and exits in Edinburgh stations 2023 to 2024 and 2024 to 2025 (source: Office of Rail and Road, Estimates of station usage)

ScotRail provides the vast majority of regional services and there has been a significant expansion of the network in the last 20 years, including:

- Airdrie – Bathgate
- Borders railway
- Edinburgh Glasgow Improvement Programme
- New rail station at Edinburgh Gateway
- New rail station at Reston
- New rail station at East Linton
- Levenmouth rail link.

Within Edinburgh, provision of rail services is relatively small, reflecting the compact nature of the city and the high concentration of bus services. Improvements on the

rail network in Edinburgh since 2010 have included electrification of the main Edinburgh to Glasgow route via Falkirk High and the Edinburgh to Glasgow line via Shotts as well as introduction of new clean, quiet rolling stock on services between Edinburgh and Glasgow.

Work has commenced on electrification of the rail line between Haymarket and Dalmeny, as well as on an upgraded electrical feeder station at Portobello. This follows completion of a similar station at Currie.

In late 2025, West Lothian Council granted planning permission for a new railway station at Winchburgh, serving routes between Glasgow and Dunblane/Stirling and Edinburgh. While funding is yet to be secured, the outline business case for the station concluded that it will provide viable sustainable travel options for those using the M9 corridor into and out of Edinburgh.

In terms of future priorities, STPR2 makes several recommendations on what rail infrastructure improvements and enhancements should be considered, including rail corridor enhancements, major station masterplans, rail freight terminals and high speed/cross border rail enhancements. Specific measures for consideration include:

1. Eastern Approaches – Portobello, Calton Tunnels, East Lothian
2. Western Approaches – Almond Chord, Winchburgh
3. Waverley Station – Increased capacity, interchange/integration with city
4. East Coast Main Line/West Coast Main Line – Birmingham, London, Europe, HS2 Re-baselining, Union Connectivity.
5. Borders Railway – Electrification, Borderlands Deal - Extension Feasibility Study
6. Suburban Rail – South Sub, Northern routes, freight, Tram-Train.

Recommendation 43 of STPR2 involves redevelopment of several major stations in Scotland including Edinburgh Waverley. The recommendation states that station plans and masterplans should be progressed to align with and support the investment priorities of Transport Scotland and Network Rail to:

- accommodate passenger and, as appropriate, freight demand in line with sustainable travel
- support net zero targets
- co-ordinate with regional activity undertaken by other strategic partners.

The Council is working with Transport Scotland, Network Rail and other partners on a masterplan for Waverley Station that will ‘create a station for people – both passengers who use the station and people who live, work and enjoy the city.’ The masterplan aims to deliver five key objectives:

- A functional station that operates efficiently and effectively as a major railway station
- A connected place that seamlessly integrates national, regional and local transport modes and optimises connectivity for all users
- A distinctive gateway that celebrates travel and proudly announces arrival into Edinburgh
- A world class environment that speaks of quality of architecture and design within a historic and urban setting
- An Edinburgh station that recognises the architecture and heritage both of the station and the City of Edinburgh but also looks to the future and considers all deliverable opportunities.

City of Edinburgh Council continues to engage with Network Rail on the need for a Waverley Station masterplan, and next steps are likely to include setting up a Steering Group for this work which would require involvement of Transport Scotland. The Council has written to Transport Scotland on this matter in February 2026.

The Council is exploring opportunities to create a mass rapid transit loop around the city using the existing South Suburban Railway, existing tram lines and new infrastructure. The South Suburban line runs from Gorgie in the west of Edinburgh along a route in the south to Portobello in the east. The line was closed to passengers in 1962 and is now used for freight and as an east coast mainline diversion.

While it was considered in the long list of options, STPR2 does not recommend the reopening of the South Suburban Line. Instead, Recommendation 12 – Edinburgh and South East Scotland Mass Transit (ESES MT) recommends that Transport Scotland works with regional partners to develop and enhance the cross-boundary public transport system for the Edinburgh and South East Scotland region, potentially comprising tram and bus-based transit modes including bus rapid transit (BRT) and bus priority measures. This would complement and integrate with the region's current bus, tram and heavy rail networks, to provide improved connectivity between Edinburgh and the surrounding communities in the region. ESES MT (now SEStransit) would include cross-boundary routes along key corridors of demand, including where congestion impacts on existing bus services, where public transport is more limited and where more congested parts of the local network connect with the strategic network.

Figure 01a.10: Suburban Rail / Tram-Train

The Proposed Plan will need to consider how development can use and support existing rail infrastructure and capacity. The emerging Waverley Station Masterplan will be a key consideration for this.

In addition to existing infrastructure, the Proposed Plan will need to consider proposed and future infrastructure, including whether any safeguards are needed for suggested improvements set out in STPR2, such as a South East Scotland Mass Transit system, (being considered through the SEStransit programme), that would improve cross boundary connections.

The Proposed Plan will need to consider the need to extend or add to existing rail infrastructure safeguards and any potential opportunities to enhance rail infrastructure capacity, including south suburban and tram/train proposals.

Living Well Locally

Scottish Government planning guidance on Local Living and 20 Minute Neighbourhoods defines Local Living as providing ‘people with the opportunity to meet the majority of their daily needs within a reasonable distance of their home’.

City of Edinburgh Council approved a 20-minute neighbourhood strategy in June 2021, updated in 2023, which emphasises that a flexible approach is needed and the distance that people will be willing to walk or wheel will vary, with different needs and expectations in urban, suburban and rural communities.

The 20-minute neighbourhood concept is supported by Policy Measure Place 2 in the City Mobility Plan which aims to 'support the 20-minute neighbourhood concept to underpin local communities and reduce the need for longer distance journeys.'

Living well locally is discussed in more detail in Topic 15 Local living.

Shared Mobility

Car club

Edinburgh's car club, which is operated by Enterprise Rent-A-Car, is the second largest in the UK with a fleet of 182 vehicles and more than 13,200 members. It contributes to various City Mobility Plan policies, reducing the need to own a car and encouraging more sustainable travel.

While car club membership decreased during the pandemic, number of members and number of trips has risen over the last two years. In 2024, 44,052 car club trips were made. In awarding the contract to operate Edinburgh's car club, the Council has ensured a commitment to incentivise use of electric vehicles.

Provision for car club vehicles is promoted through the development management process. The Council's Parking Standards state that for some developments, applicants should be required to provide space for car club cars. This is underpinned by the Council's Supplementary Guidance on Developer Contributions and Infrastructure Delivery which sets out the developer contributions required for car club.

Bike hire

In September 2025, a public bike hire scheme was launched in Edinburgh. Operated by Voi, the two year pilot involves 600 bikes available for hire at 39 locations throughout the city. The bikes can be parked and picked up from designated parking places or within areas indicated on the App that facilitates use.

Mobility Hubs

Provision of mobility hubs is promoted in Edinburgh through various overarching City Mobility Plan policies and by site specific policies in City Plan 2030. In addition, there are developer contribution zones for specific mobility hubs set out in the Council's Supplementary Guidance on Developer Contributions and Infrastructure Delivery.

Provision of a mobility hub formed part of the planning consent for the Granton Waterfront Masterplan which will see more than 700 new homes built in the north of Edinburgh and contributions for a mobility hub have been sought from applications in Bonnington.

Promotion of mobility hubs through the planning process will continue in order to contribute to lower levels of private car use.

The Proposed Plan will need to consider how mobility hubs can assist with sustainable travel in new development and how they can be. City Plan 2030 includes safeguards for mobility hubs in various parts of Edinburgh. Consideration needs to be given to continuation of and any addition to these safeguards.

The Proposed Plan will also need to consider how best to use car club and bike hire networks to support development and reduce use of private motorised vehicle use.

Taxi and Private Hire

Taxis form an integral part of shared mobility options in Edinburgh with a mix of black cabs and private hire cars. City Mobility Plan 2030 provides a policy basis for enhancing taxis in Edinburgh.

As of 1 January 2026, there were 1,074 Taxis and 3,071 Private Hire Cars licensed by the Council. In terms of infrastructure, there are 82 official taxis stances and 16 booking offices spread across the city.

Road Network

Strategic Roads

There are 76 kilometres of strategic trunk road within the City of Edinburgh Council area, all managed by the southeast unit of BEAR Scotland on behalf of Transport Scotland. The trunk network is comprised of:

- A720 – Edinburgh City Bypass
- M90 – in the north-west, leading to the Queensferry Crossing and Forth Road Bridge
- M9 – to and from the north-west
- M8 – to and from Glasgow and the west
- A1 – to and from East Lothian

According to Transport Scotland's Scottish Transport Statistics, there were just over 1 billion vehicle kilometres driven on trunk roads within the City of Edinburgh Council area in 2024. While there were dips between 2020 and 2022 during the Covid pandemic, this represents an increase of 4% on 2019 levels. This contrasts with a 3% reduction in car kilometres on local roads over the same period but corresponds with the increase in Edinburgh's population in that time. The trunk road network in and around Edinburgh is subject to capacity constraints, particularly due to Edinburgh's position as a major trip generator and attractor. This is evident on key arteries into and out of the city with the A720 City Bypass having capacity issues at major junctions including Old Craighall, Sheriffhall, Straiton, Lothianburn, Dreghorn,

Baberton/Calder, Hermiston and Gogar. Further increases in demand will increase pressure.

Traffic flow data on the trunk road network around Edinburgh shows that traffic levels have been rising steadily as the city and the region's population has grown. While some trunk roads, particularly in the west, saw reductions in traffic between 2018 and 2024 the entire trunk road network has been subject to increases in traffic between 2015 and 2024. According to Department for Transport count data, the largest increases have been predominantly in the south and east on, and adjacent to, the A720. Average daily traffic levels on the A68 at the approach to the Millerhill junction of the A720 increased by 30% between 2015 and 2024 as did traffic on the A720 at Hermiston. Traffic on the A1 at the approach to the Old Craighall junction with the A720 saw increases in traffic of 28% between 2015 and 2024. Traffic levels on the A720 either side of Sheriffhall roundabout increased by 12% between 2015 and 2024.

	Average daily flow (all vehicles)			**Percentage Change**	
	2015	**2018**	**2024**	**2015-2024**	**2018-2024**
M90 at south end of Queensferry Crossing	N/A	75,596	74,680	N/A	-1%
M8 at Gogarburn	65,835	68,678	69,971	6%	2%
M9 between Kirkliston and Newbridge	70,859	80,034	73,830	4%	-8%
M9 between Winchburgh and Kirkliston	35,108	45,419	38,278	9%	-16%
A68 approach to Millerhill Junction	11,768	12,271	16,011	30%	30%
A1 approach to Old Craighall	43,893	52,629	56,175	28%	7%
A720 at Hermiston	67,857	90,997	88,009	30%	-3
A720 at Baberton	73,207	74,188	76,627	5%	3%
A720 east of Lothianburn	76,897	69,149	78,344	2%	13%
A720 west of Sheriffhall	44,278	47,882	49,740	12%	4%
A720 east of Sheriffhall	44,874	47,105	50,269	12%	7%

Figure 01a.11: Average annual daily flows on key sections of trunk road (source: Department for Transport Road Traffic Statistics)

As traffic levels have continued to increase on the trunk road network, average speeds and travel times on most of the trunk roads have reduced compared to pre-covid levels. Inrix traffic data shows that there has been a slight recovery with average speeds across all roads increasing by 1.42% between 2023 and 2025 and average travel times decreasing by 2.92% over the same period. The exception is

the A720 which saw average speeds continue to decline and average travel times continue to increase. Average speeds on the A720 in 2025 were 5.2% slower than in 2019 and average travel times had increased by 7.3% over the same period.

		A720	M90	M8	M9	A1	All Road Average
Average Speed	**2019 to 2023**	-4.4%	-1.5%	-5.3%	-4.1%	-4%	-3.86%
	2023 to 2025	-0.8%	2.1%	0.6%	0.5%	4.7%	1.42%
	2019 to 2025	-5.2	0.5%	-4.8%	-3.6%	-0.5%	-2.72%
Average Travel Time	**2019 to 2023**	-3.6%	No change	-5.9%	-3.4%	-5.0%	-3.58%
	2023 to 2025	-3.5%	7.4%	1.9%	No change	1.8%	2.92%
	2019 to 2025	-7.3%	7.4%	-5.9%	-3.4%	-3.0%	-2.44%

Figure 1a.12: Average speeds and travel times between 2019 and 2025 on trunk road network (source: Inrix)

While Inrix data looking at the trunk road network during 2025 shows that there are no particular areas of the pressure on the A1 and M9, the M90 at the southern approach to the Queensferry Crossing is subject to some congestion northbound during the afternoon peak with traffic flowing at 34% of free flow speeds. There is some congestion on the M8 in both directions at Hermiston during both the morning and afternoon peaks, with traffic around the junction with the M9 moving at 49% of free flow speeds between 7am and 8am and traffic at the Hermiston Gait junction travelling at 47% of free flow speeds between 4pm and 5pm.

The A720 suffers from the most severe congestion on the trunk road network in and around Edinburgh. Congestion is particularly acute close to key junctions, including at the western end between Baberton and Hermiston during the afternoon peak when traffic flows at 51% of free flow speeds between 3pm and 4pm and at the Lothianburn and Straiton junctions with respective traffic flows of 36% and 30% of free flow speeds between 3pm and 4pm. The worst stretch of road for congestion is at Sheriffhall Roundabout where traffic flows at between 34% and 47% of free flowing speeds between 7am and 6pm.

	7am to 8am	8am to 9am	9am to 10am	10am to 11am	11am to 12pm	12pm to 1pm	1pm to 2pm	2pm to 3pm	3pm to 4pm	4pm to 5pm	5pm to 6pm
A720 at Sheriffhall	42%	41%	40%	39%	38%	37%	40%	41%	36%	34%	47%

Figure 1a.13: Traffic flow on A720 at Sheriffhall – flow speeds as percentage of free-flowing speeds (source: Inrix)

Although some data shows that the largest growth in traffic has been to the south and the east, the Transport Appraisal undertaken for City Plan 2030 identified particular increases in traffic flows on the M9 Southbound on-slip at Newbridge Junction should development in City Plan 2030 evolve with no transport improvements. However, sustainable transport measures set out in the Plan, including West Edinburgh improvements, would be expected to mitigate the increased flows.

Planned development in Midlothian will put pressure on the network at these points, however projects such as SEStransit will provide some mitigation to potential negative impacts. Work planned on the trunk road network over the next 5 years includes several routine safety and maintenance works, including annual resurfacing and drainage projects on bridges on the A720, M8, M9 and M90 as well as annual cyclic maintenance works, much of which will be scheduled during nighttime closures. There is also likely to be significant works at A720 Water of Leith Bridge over the next 5 years.

The Sheriffhall roundabout, an at-grade six-way junction on the City Bypass connecting the A720, A7 and A6106 is a particular strategic pinch point subject to regular congestion. Scottish Government funding has been made available through the Edinburgh and South East Scotland City Region Deal to improve the junction through creation of grade separation. This includes separating local traffic, including public transport, from trunk road traffic. The proposed improvements would relieve pressure on the junction while providing safe routes from north to south between Edinburgh and Midlothian for pedestrians and cyclists. The improvements in cross local authority boundary connections will also support region wide development. The outcomes of a Public Inquiry are awaited and the Report is currently with the Scottish Ministers.

Local Roads

There are 1,563 kilometres of roads in Edinburgh manged by City of Edinburgh Council and its total road assets include:

- Carriageways 1,563 km
- Footways, footpaths & cycleways 2,249 km

- Structures — 350 bridges /structures
- Street Lighting — 59,462 street lighting columns
- Traffic Management Systems — 23,821 traffic signal/equipment units
- Cycle Network — 312 km of cycle routes
- Park and Ride Sites — 3 sites.

The A8/A89 corridor linking Edinburgh to West Lothian is one of the busiest arteries within the city and across local boundaries. As referred to in the Public Transport section, to help alleviate network pressure and improve connections between communities and employment, funding was made available through the Edinburgh and South East Scotland City Region Deal to deliver measures that improve bus journey times and provide active travel infrastructure making it easier to walk and cycle between Maybury in Edinburgh and Broxburn. The raft of measures, under the umbrella of the West Edinburgh Transport Improvement Programme, includes a combination of bus priority lanes and active travel infrastructure. Work will commence in 2027 and is expected to last for two years.

Data on traffic flows in Edinburgh is limited. Journey time data and UTC data on roads throughout the city is recorded when specific needs arise. The Council is working with Viva City towards collecting traffic origin/destination on 18 routes within the city. This will contribute to the data and evidence base that will inform the Transport Appraisal for the Plan.

Investment Priorities

The Council's carriageway, footway, structures, street lighting and traffic management systems are managed through the Council's Transport Asset Management Plan (TAMP) which oversees the Council's Roads and Infrastructure Investment Programme. This provides a framework for the capital budget of £26.09m for 2025/26 which is funded through a combination of General Capital Grant from the Scottish Government, Developers and Third-Party Contributions, capital receipts and borrowing. The budget is to be allocated across six different work streams:

- carriageways and footways
- street lighting and traffic signals
- road structures
- other asset management
- road operations
- miscellaneous.

The carriageway and footway element of the capital programme is based on a scheme of prioritisation which uses condition assessment scores, prioritisation criteria and weightings to determine which projects should be prioritised for

investment. The condition of Edinburgh's roads is assessed annually as part of the Scottish Roads Maintenance Condition Survey (SRMCS), an independent survey of road conditions in all 32 Scottish local authorities. The survey provides each local authority with a Road Condition Index (RCI) which identifies the percentage of roads in need of maintenance. The current RCI for Edinburgh is 31.6%, an improvement from 34.1% in 2024/25. Scottish Transport Statistics 2025 suggest that 29% of Edinburgh's roads were in need of repair, 5% of which were assessed as condition red and 24% amber.

The prioritisation system for the capital programme is designed to ensure that the strategic road and footway network is maintained in line with the City Mobility Plan. The budget for footway investment in 2025/26 is £3.5million. This will be allocated across three footway programmes: Prestige/Primary, Link/Local Access and Local/Minor. In addition to this allocation, further footway improvements will be carried out as part of street design improvements with carriageway resurfacing and strengthening schemes.

Footway schemes will continue to implement the Street Design Guidance proposals as part of the main footway renewal schemes. This will result in both condition and streetscape improvements for footway users. Common footway improvements that are implemented include the introduction of dropped kerbs, the tightening of junction radii, raising table levels and widening footway widths where possible.

The Council's carriageway, footway and structures maintenance investment priorities for 2026/27 were reported to the Council's Transport and Environment Committee in April 2026.

The Proposed Plan needs to consider issues and areas of pressure on the network to inform a spatial strategy that ensures potential development sites are located in the right areas. The transport appraisal work for the Proposed Plan will need to identify the best options for development with the least possible impact on the road network.

Car Parking

Parking provision in Edinburgh

There are more than 42,000 Council controlled parking bays in Edinburgh, delineated across a variety of types:

Type of Parking Bay	Number of Bays (Capacity Only)
Resident CACZ	21,490
Shared Use Bays	12,465

P&D CPZ and Non-CPZ	3,894
Mews/Permit Parking Area	95 permit areas - no bays
Disabled Bays	2,045
City Car Club	303
Solo M/C Bays	998
Loading Bays	341
Bus Bay	3 locations
Police	28
Other	810
Diplomatic Bay	5
TOTAL BAYS	**42,379**
Greenway Parking/Loading Places	354 parking places - unknown number of bays

Figure 1a.14: Number of Council parking spaces in Edinburgh

Parking Controls

Edinburgh introduced a Controlled Parking Zone (CPZ) in the 1970s to manage commuter parking in the city centre and to protect parking opportunities for residents. In the last 20 years, the CPZ has been expanded and Priority Parking Areas (PPA), where short sections of kerb space are controlled for short periods of time, have been introduced to address commuter parking pressure on the edges of the CPZ.

There are currently 25 CPZs and 9 Priority Parking Areas in Edinburgh. A Strategic Review of Parking was started in 2022 and is reviewing parking across Edinburgh to ensure appropriate controls are in place to manage parking demands and ensure road safety. The Review is split into five distinct phases looking at various areas of Edinburgh where parking pressure is an issue.

Parking controls are also considered as a demand management tool to reduce car use and parking pressure in new developments, for example, introduction of a controlled parking zone is being discussed in the recently approved Granton Waterfront development which will see more than 700 new homes in Granton with car parking levels of around 25%.

In addition to formal parking zones or areas, the Council provides a range of site-specific parking controls across the city through yellow line restrictions and designated parking places. For many Disabled Persons' Blue Badge holders, finding a suitable parking place outside their home can be a challenge. To help improve the

mobility of disabled drivers, the Council complies with the terms of the Disabled Persons' Parking Places Act by assessing all requests for new Disabled Persons' Parking Places in residential areas and providing such parking places.

Parking Enforcement

Following provisions introduced in the Transport (Scotland) Act 2019, Edinburgh introduced new parking rules and commenced enforcement in 2024. The key element of enforcement is aimed at reducing footway parking, double parking and parking at pedestrian crossing points to make streets safer for pedestrians and vulnerable road users, such as young people and cyclists.

There are almost 600 kilometres of parking restricted kerbside in Edinburgh.

Type of Restriction (kerb blips)	Length (m)
Double (None)	247,770
Double (One)	12,346
Double (Two)	115,563
Double Yellow Line Total	**375,679**
Single (None)	124,251
Single (One)	66,190
Single Yellow Line Total	**190,440**
Yellow Line Total	**566,119**
Greenway Double	25,594
Greenway Single	7,224
Greenway Total	**32,818**
Total All	**598,937**

Figure 1a.15: Lengths of parking restricted kerbside in Edinburgh

Parking Standards

Edinburgh's current local development plan, City Plan 2030 is clear that new development should ensure that Edinburgh is a city where a car is not needed for people to live well or to move around. One of the key delivery mechanisms for reducing car use and ownership is the parking standards contained within the Edinburgh Design Guidance that sets out the maximum levels of parking allowed in new developments. The Parking Standards, which were updated in September 2025, break down parking levels for each planning use class across three distinct areas of Edinburgh, linked to availability of alternative modes of transport to car:

- City centre zone – incorporates Low Emission Zone, generally no parking is allowed in new development
- Zone 2 – covers most of the urban area outside the city centre, some parking is permitted

- Zone 3 – rural areas of Edinburgh and other areas with low levels of public transport availability.

While the Parking Standards aim to reduce levels of parking, there is a requirement for developers to consider access for disabled people, even when no car parking is being provided. In addition, the Parking Standards set minimum requirements for cycle parking and requirements for electric vehicle charging provision.

Park and Ride

Park and ride / Choose is an important element of the regional transport network. It has provided users with easier access to the public transport networks, reducing the number of car trips within Edinburgh. Historically, park and ride targeted commuting trips, but it is increasingly popular amongst leisure users, particularly at Ingliston, where there is access to the tram. Major park and ride sites in the southeast Scotland region include:

- Rail: Inverkeithing, Bathgate, Eskbank, Tweedbank, Newcraighall, and Wallyford
- Bus: Halbeath, Ferrytoll, Ingliston, Hermiston, Straiton, and Sheriffhall.

Land is available to expand the existing park and ride site at Hermiston, however usage levels have not returned to pre covid levels so the potential expansion is in doubt. The Ingliston park and ride often operates at capacity, particularly during the Edinburgh Festival and on days when events are held at Murrayfield. There is potential to add multi-storey levels to increase capacity, however there are no current plans to expand and other approaches will be considered. The park and ride site at Straiton has waiting and information facilities, however this is not staffed and is in need of repair. The site has never been particularly successful and Lothian Bus services do not enter the site as services run quicker using bus stops on the A701. Discussions are taking place between Midlothian Council and the owner of the site to identify an alternative site to the south of the existing site.

There is an opportunity to grow the network with potential for strategic sites on the M8 and M9.

Mobility hubs within local town centres also provide an opportunity to improve walking and cycling access to the public transport network, while reinforcing local communities and improving placemaking and the urban realm.

The Proposed Plan will need to consider how the Council's parking policies and approach can support its spatial strategy, and any place related policies and development principles for potential sites.

Electric Vehicles

To supplement the 172 existing public EV charge points provided by the Council across the city to date, the Strategy and Expansion Plan proposes an initial expansion of an additional 464 new charge points by 2030, predominantly at on-street locations and comprising of 380 x 7kW AC charge points, 40 x 22kW AC charge points and 44 x 50kW+ rapid charge points.

The emphasis on 7kW AC chargers will provide lower-cost charging opportunities across the city, compared with other, faster public charge points that will be available in the city to provide for the broad range of charging requirements/behaviours.

In addition to increasing charger provision in the city, the Council is currently leading a partnership of local authorities by combining resources to procure a commercial Charge Point Operator to deliver an improved public charging network across Edinburgh and most of the South of Scotland, including significantly more electric vehicle charging points.

The South of Scotland local authorities involved are: City of Edinburgh, Clackmannanshire, Dumfries and Galloway, Falkirk, Fife, Midlothian, Scottish Borders and West Lothian. To guide future charging provision across the South of Scotland, and to respond to growing electric vehicle use, ageing infrastructure and reduced government funding; a South of Scotland EV Charging Strategy has been produced that comprises the Council's Electric Vehicle Infrastructure Strategy and Expansion Plan.

Work will continue through 2026 to develop the partnership and secure a commercial delivery partner.

The Proposed Plan needs to consider what should be in place to support the Council's objectives to encourage transition to greater electric vehicle use, including supporting provision of charging infrastructure where appropriate to new development.

Road Safety

In order to work to achieve the aims of the Council in delivering road safety and Vision Zero, the Council's Road Safety team is focused on several key work strands. The delivery mechanisms of road safety in Edinburgh are road safety delivery actions contained within the City Mobility Plan and the Road Safety Delivery Plan 2025/26. Actions are focused on the following priorities:

- Improved infrastructure for safe school travel
- New school travel audits process

- School streets
- Promotion of enhanced powers to enforce moving traffic offences
- Road safety education for school and young people
- Accident investigation and prevention (AIP)
- Improved pedestrian crossing infrastructure
- Speed management plans
- Speed limit reductions
- Road safety casualty data.

The approach to improving pedestrian crossing infrastructure has become more proactive through identification of potential junctions to form a junction improvement programme.

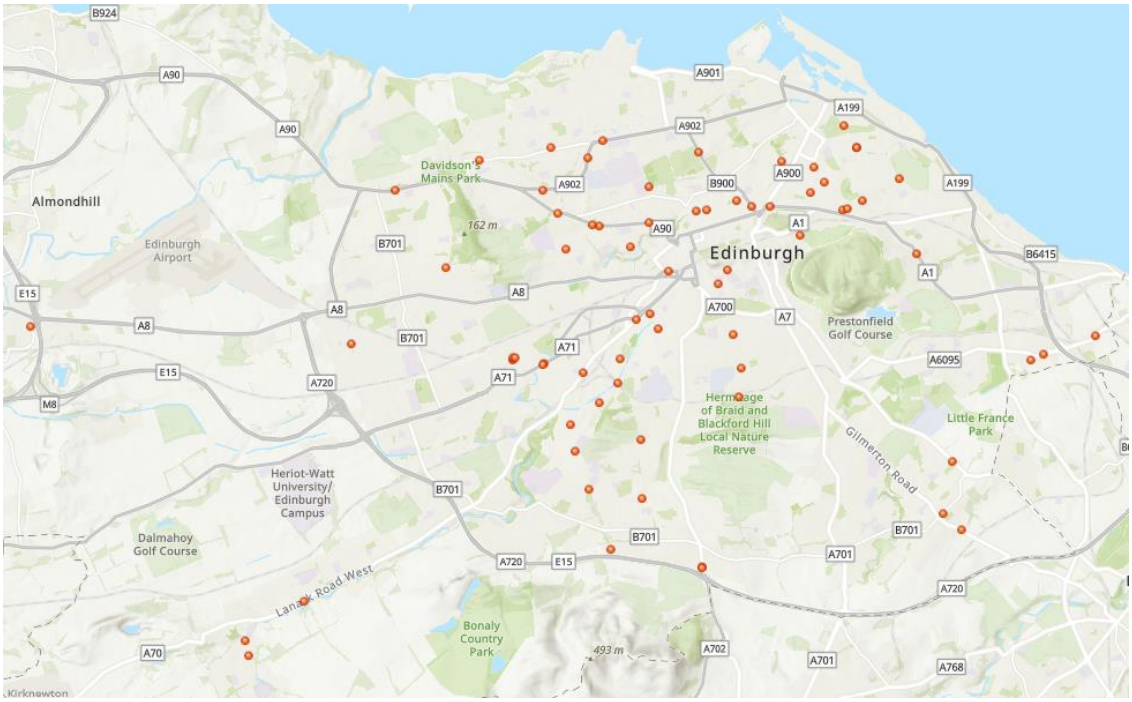


Figure 1a.16: Locations of proposed pedestrian crossings

New processes are being implemented to improve working with schools. This includes working with schools on travel plans and engagement with parents. Policies around speed limit reduction are being enhanced. This includes stipulating that all new roads in Edinburgh should have a 20mph speed limit and that this should be designed in through the planning process.

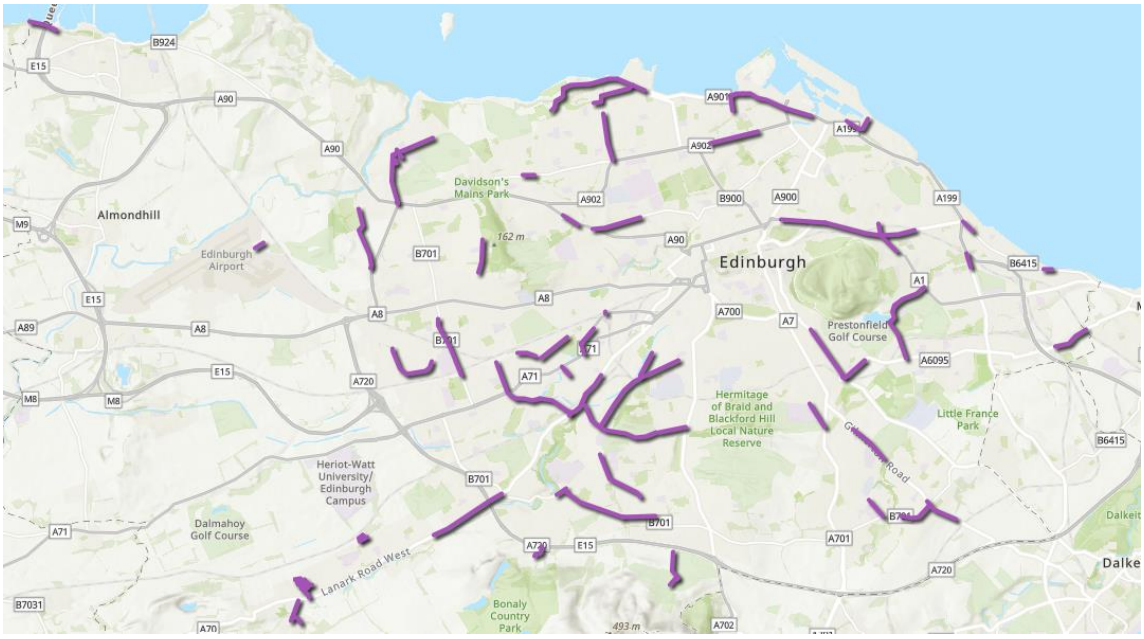


Figure 1a.17: Locations of proposed new 20mph zones

Since 2011, there has been a continuous downward trend in collisions in Edinburgh resulting in serious injury. There was a 2% reduction in the average number of people killed or seriously injured (based on rolling three year average) between 2019/21 and 2020/22. In the same period, there was an 11% decrease in the number of young people (under 18) seriously injured, a 13% decrease in the number of pedestrians seriously injured and a 10% reduction in the number of cyclists seriously injured (Sources: CrashMap and STATS 19).

In terms of the trunk road network, there was a reduction in the number of people killed and seriously injured between 2018 and 2024. The average number of people seriously injured on trunk roads in the period between 2014 to 2018 was 17 while the average for 2020 to 2024 was 7. In the same two periods, the average number of people slightly injured on trunk roads in Edinburgh fell from 91 to 52.

The Council has committed to reviewing its current Collison Analysis processes in order to ensure ‘best value’ in determining suitable responses to risk on the road network. Traditional methodologies have been based on historical collision data which defined a reactive process; however, the Council is looking to move to a proactive approach and consider risk predictive data in addition to any available collision statistics.

The Council’s Transport and Environment Committee has approved the principle of predictive / risk modelling as a data source to support new road safety policy; this will be a valuable tool when considering future road safety investment decisions and the use of predictive risk modelling is intended to inform future investment strategy and manage risk on the road network.

Software that incorporates ‘risk prediction tools’ is in the process of being procured. It offers 'risk prediction tools' and offers network wide analysis over a variety of road users and circumstances, based upon reference to historical collision data as well as a wide range of diverse, distinctive data sources, not limited to, but including: Satellite Sensor Data, Meteorological Networks, high fidelity Physical Models and Maps/GIS. These are refreshed annually. When adopted, it will provide valuable information when considering the Road Safety Plan's stated objectives and would enable Road Safety 'enquiries' as well as the possibility of the programme being useful to other teams / areas of the Council.

While Edinburgh has seen consistent improvements in road safety in recent years, continued enhancement of data collection and analysis, as well as improved processes, should ensure, that as development continues any issues around road safety are mitigated against. The adoption of processes enhancing the Council’s ability to forecast future issues is particularly pertinent.

The Proposed Plan will need to consider how policies and the design of new development can contribute to achieving the Council’s Vision Zero aims.

Environmental

Air Quality

Edinburgh’s Air Quality Action Plans (AQAPs) focus on Air Quality Management Areas (AQMAs) declared to deal with breaches of the statutory air quality objectives for local pollutants Nitrogen Dioxide (NO_2) and Particulate Matter (PM_{10} and $PM2_{2.5}$). The city currently has four AQMAs for NO_2, predominantly from road traffic and a further AQMA (Salamander Street) declared for $PM_{10,}$ due to a mix of sources including transport. The AQMAs are:

- Central
- St John’s Road
- Great Junction Street
- Glasgow Road
- Salamander Street

The Inverleith Row AQMA was revoked in early 2024 as pollution had reduced in the area. The Council is also considering revocation of the Great Junction Street AQMA.

The Air Quality Action Plan, improvements in vehicle technology and reductions in traffic flows have ensured that there continues to be a downward trend in roadside air pollution levels. The latest available data shows that the majority of monitoring stations are compliant with legal limits with the exception of Tower Street in the Salamander Street AQMA which remains a priority for improving air quality in Edinburgh.

In 2022, Edinburgh introduced a Low Emission Zone (LEZ) to an area of the city centre within which drivers of high polluting vehicles are not allowed. The Edinburgh LEZ covers most of the city centre with the boundary including the West End, Queen Street and the New Town, Greenside at the top of Leith Walk, Abbeyhill on the east, Pleasance, Meadows and Tollcross (See Figure 1a 9). The LEZ, which includes all types of vehicles (with few exemptions), had a 2 year ‘grace period’ before formal enforcement commenced on 1 June 2024.

One of the mandatory objectives of the LEZ is to ensure its implementation contributes towards reduction of emissions in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009. The Council is continuing to work in close partnership with Scottish Environment Protection Agency (SEPA), Transport Scotland and the Scottish Government to evaluate the LEZ, with the first full Annual Report laid before Parliament in January 2026.

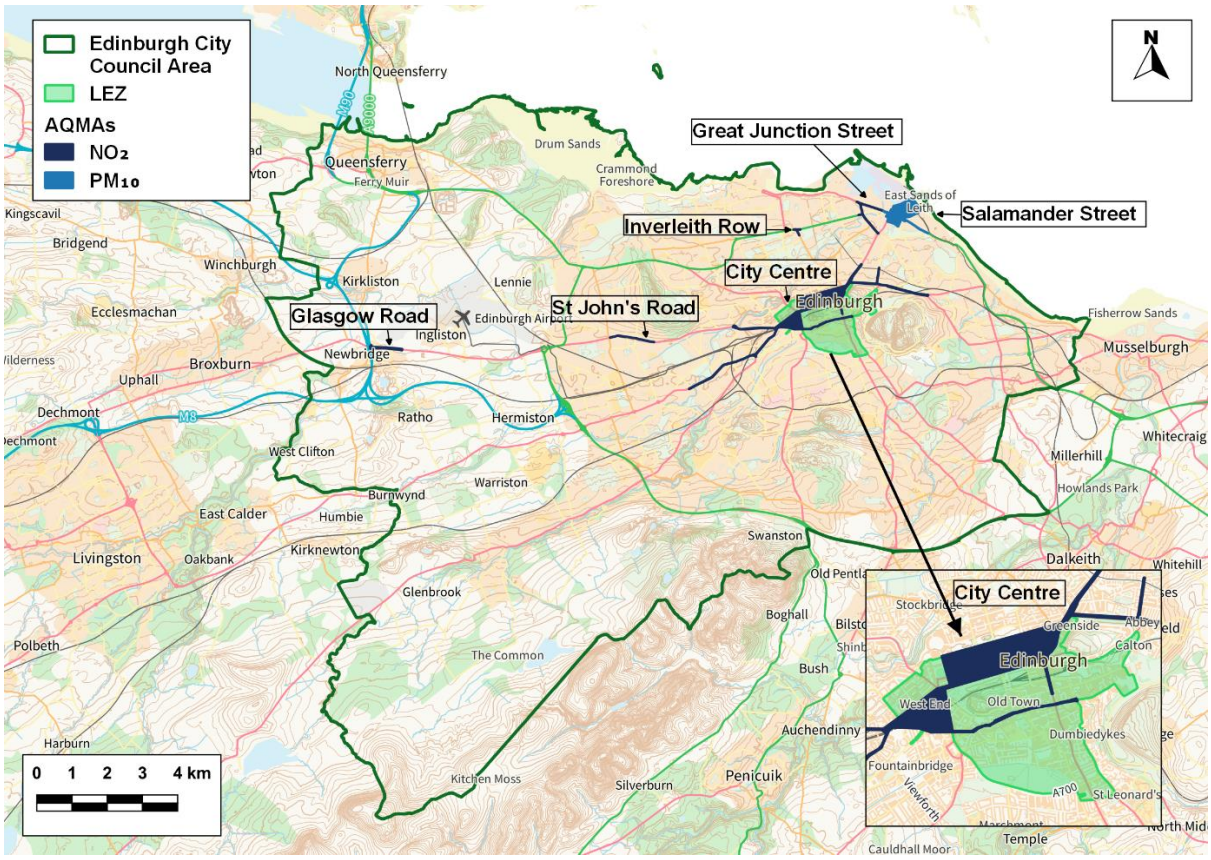


Figure 1a.18: Edinburgh’s Air Quality Management Areas and Low Emission Zone

Greenhouse Gas Emissions

Transport is one of the largest contributors to greenhouse gas emissions in Edinburgh, with road transport alone accounting for 640.3 kt CO2e in 2023. Although this is a 37% reduction compared to 2005 levels, it means road transport accounts for nearly 30% of all of carbon emissions in Edinburgh.

Topic 08 and 09 Climate change and climate mitigation deals with Edinburgh's environmental and climate adaptation policies and strategies and the role a future development plan will play.

Freight

While movement of freight and goods into, out of and within Edinburgh is vital to the city's economy, the number of goods vehicles continues to rise. In 2023 there were 800 HGVs licensed in Edinburgh, a 33% increase since 2013. In the same period there was a 25% increase in number of light goods vehicles licensed, meaning 14,900 registrations in 2023.

The large volume of goods vehicles on the city's roads contributes to congestion and greenhouse gas emissions and has adverse impacts on air quality, road safety and road infrastructure. Traffic studies undertaken for SEStran's 2022 Go Forth Freight Study Case for Change showed that the areas of Edinburgh with the highest volumes of goods vehicles were:

- Leith Docks west along Ferry Road and Queensferry Road towards the A90 and M8
- Leith Docks east along Seafield Road towards A1
- A71 Gorgie Road

The Detailed Options Appraisal that followed the Case for Change assessed three options for sustainable freight movement that have the potential to replace large volumes of road freight:

- Use of Edinburgh tram to carry freight – this would use the Tram network to move small and medium sized goods between Newhaven, Port of Leith, City Centre and Edinburgh Airport
- Use of passenger trains to carry freight – this option involves retrofitting former electric passenger trains for carriage of freight as locomotives traditionally used to haul freight trains are generally slower than passenger trains
- Multi-user freight train – rail freight services used by multiple businesses would make use of rail more attractive.

In terms of existing rail freight, Network Rail view the South Suburban line as a critical rail freight artery linking the East Coast Mainline to the rest of Scotland. There is a rail freight site at Leith with the docks still being connected via Network Rail infrastructure. There is also a freight yard at Portobello with links to the City Bypass and A1.

In late 2025, both the Scottish and UK Governments, working in partnership, approved the final business case for the Forth Green Freeport. The aim of the Freeport is to stimulate growth of green technologies, alternative fuels and manufacturing associated with renewable energy. It will also aim to provide jobs and improve movement of freight by sea and rail.

In the context of increasing freight movement on the city's roads, the Proposed Plan needs to consider how it can support rationalisation of freight traffic. This might include safeguards for delivery hubs or consolidation centres as well as supporting use of rail infrastructure.

Canal

Lochrin Basin in Tollcross is the eastern terminus of the Union canal which extends west to Falkirk where it connects to the Forth and Clyde Canal. The towpaths of both the Union and Forth and Clyde Canals form a 106 kilometre footway and cycleway, connecting the east and west coasts of Scotland through the central belt, and form part of National Cycle Network route 754.

Recent enhancements to active travel infrastructure in Edinburgh have improved connections to the canal, including the Roseburn to Union Canal path which provides an off-road connection from the North Edinburgh path network at Roseburn to the canal.

Future improvements include alternative routes over the canal at Slateford where the existing route across Slateford Aqueduct can be challenging for some users due to its lack of width and cobbled surface.

Edinburgh Airport

Edinburgh Airport is within the City of Edinburgh Council boundary. It is served by direct tram services, express and regional bus routes, and connections to the strategic road network (A8, A720, M8 and M9).

The number of passengers using Edinburgh Airport continues to grow annually. In 2019 there were 14.7 million passengers. In 2025, numbers had increased by 15.6% to 17 million. Passenger numbers are projected to keep growing with the Airport forecasting 19.2 million passengers using the airport by 2030, 25.8 million by 2040 and 35 million by 2050. Source: Edinburgh Airport Masterplan 2016

To accommodate projected long-term growth, as well as improving long-term operational resilience, the Airport considers the continued safeguarding of a potential future second runway to be vital. City Plan 2030 continued the previous Plan's safeguards to manage development which might otherwise prejudice that future

expansion. Continuation of safeguarding will be a matter of consideration for the Proposed Plan.

There are planned improvements to airport access, including Turnhouse Road and the Eastern Access Road, which is included in City Plan 2030, the West Edinburgh Transport Improvement Programme and the West Edinburgh Placemaking Framework.

Edinburgh Airport considers itself a key component of development and strategic growth in West Edinburgh, including in such locations as West Town, Gogar, the Royal Highland Centre and Edinburgh Park.

The Proposed Plan will need to consider the existing safeguards in respect of the potential second runway.

Transport Poverty

The Scottish Index of Multiple Deprivation shows areas of deprivation in Edinburgh. While the Index shows that much of Edinburgh is relatively comfortable in terms of deprivation there are pockets around the edge of the city boundary which are in the areas of highest deprivation.

In 2020 the Edinburgh Poverty Commission produced a report, A Just Capital, Actions to End Poverty in Edinburgh, detailing Council actions required to end poverty in Edinburgh by 2030. The report talks about the difficulty some people in Edinburgh face in affording travel to work and education. It includes various actions that will help to address transport poverty, including ensuring that the planning and design of housing, employment, services and amenities address the need for quality spaces, green space, support, activities and opportunities where people live.

Addressing transport poverty is also a key element of City Mobility Plan 2030. One of the Plan's objectives is ensuring that transport options in the city are inclusive and affordable. This is supported by an action that aims to encourage an increased range of flexible and affordable fares on public transport.

Disused Rail

The Planning (Scotland) Act 2019 requires that planning authorities, when preparing local development plans, 'are to have regard to the desirability of preserving disused rail infrastructure for the purpose of ensuring its availability for possible future public transport requirements.' There are several disused railway lines in Edinburgh that are currently used as active travel and core path routes. City Plan 2030 policy Inf 10 Cycle and Footpath Network states that development will not be supported if it would

‘prejudice the possible incorporation of an abandoned railway alignment into the off-road path network.’ In addition, City Plan 2030 includes safeguards for the protection of specific portions of disused railway, including Roseburn Path to the west of the city centre, further west of the city at Kirkliston and in the east at Brunstane.

The Proposed Plan will need to consider the existing City Plan 2030 safeguards and their purpose in terms of protection of disused railway infrastructure.

Economic Impact

According to the 2023 Edinburgh Walking and Cycling Index walking, wheeling and cycling removes up to 160,000 cars off Edinburgh’s roads each day, creating £262.6 million in economic benefit for Edinburgh annually.

Summary of stakeholder engagement

Key Agency	**Transport Scotland**
Main views raised	**Scoping (May 2025):** • Need for sustainable travel hierarchy to be included in Evidence Report • Important to focus on current baseline evidence • Cross boundary issues must be considered in the Evidence Report • Must be a commitment to undertake a transport appraisal for the Proposed Plan. **Draft Topic Papers (Nov 2025):** • More detail needed on SEStran Go Forth Freight Study Case for Change • Should include STPR2 Recommendation 43 and more detail on Recommendation 12, including information on current stage of work, timescales and next steps • More detail should be included on large-scale transport projects including West Edinburgh Transport Improvement Programme, West Edinburgh Placemaking Framework and SEStransit • More detail should be included on specific cross boundary projects, schemes studies, including implications for the Proposed Plan • More data required on trunk road statistics, including travel patterns, traffic flows, journey times • More detail required on road condition/issues • More accident/road safety data required • Addition of more text on South Suburban railway needed

	• More detail on delivery of current Plan transport projects should be included. **Final Topic Papers (March 2026):** • Additional traffic flow data required including journey time information and travel patterns • Commitment to future collaboration on transport appraisal referenced.
Council response and implications for the proposed plan	All recommendations have been incorporated into the Evidence Report
Is the agency content with the evidence	Transport Scotland does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient. Transport Scotland have advised: "The Infrastructure - Transport Evidence Report (ER) Chapter is considered sufficient in accordance with LDP Guidance Policies 13 and 18, which are key considerations for Transport Scotland in the ER process relating to its assets, projects and strategies. The Council has fully addressed earlier recommendations provided on the draft Chapter relating to the need for further detail on STPR2 recommendations 43 and 12; WETIP, City Plan 2030 transport appraisal, cross boundary considerations, trunk road and rail station data."
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Transport Scotland will be regularly consulted throughout the preparation of the Proposed Plan, particularly as a key partner in the preparation of the Transport Appraisal that will inform the Proposed Plan.

Key Agency	**SEStran**
Main views raised	**Scoping (May 2025):** • Discussion around regional strategies, policies and projects and other work being undertaken by SEStran.

	Draft Topic Papers (Nov 2025): • Recently published Bus Strategy should be included in the Evidence Report • Information on the SEStransit project should be included in the Report • Importance of joined up working approach to Planning highlighted • Should incorporate findings from SEStrans' review of Transport to Health study.
Council response and implications for the proposed plan	The recommended strategies and projects have been included in the Evidence Report. Reference to joined up working is made in various parts of the Report.
Is the agency content with the evidence	SEStran does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient. SEStran have advised: "We have reviewed these documents and are happy with the changes."
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Important to continue engagement and collaboration with SEStran throughout the proposed plan stage.

Key Agency	**NHS Lothian**
Main views raised	**Draft Topic Papers (Nov 2025):** Main issues raised: • Transport Appraisal should include analysis of unequal access to public transport and active travel networks and identification of communities affected by transport poverty • Evidence in Report should highlight safe, well-connected sustainable transport links, how infrastructure is made suitable for users of all abilities and investment in behaviour change initiatives • Edinburgh Physical Activity and Sport Strategy 2024-2034 should be included in the Report • Priority for public transport links for those living in deprived communities is recommended • Should highlight evidence that supports efforts to reduce car dependency

	• Opportunities to work with major employers, such as NHS Lothian and Edinburgh University, should be explored • Climate impact of travel and transport should be included in implications • Paper should consider including evidence on levels of chronic disease associated with low levels of physical activity, poor air quality, noise, social isolation and climate change related to transport • Recommended that transport infrastructure should support safe, inclusive public spaces • Recommended that sustainable travel is a focus of design of new development areas • The following additional local strategies should be included in the Report: - Climate Ready Edinburgh Plan - Local Outcome Improvement Plan – Priority 3 - Edinburgh Children's Services Plan - Equally Safe Edinburgh - NHS Lothian Public Health and Health Policy paper - A strengthened approach to prevention across the Lothian health and care system
Council response and implications for the proposed plan	Transport appraisal, public transport recommendations, street design elements and recommendation that sustainable travel should be key consideration will be considered in preparation of the Proposed Plan. Active travel and air quality are discussed extensively in the Report. Most of the recommended additional policies and strategies have been included in the Evidence Report.
Is the agency content with the evidence	NHS Lothian does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The transport appraisal for the Proposed Plan should consider including explicit analysis of unequal access to public transport and active travel networks as well as identification of communities affected by transport poverty.

Key Stakeholder	Homes for Scotland
Main views raised	**Final Topic Papers (March 2026):** The following evidence sources should be included: - Transport Scotland Active Travel Framework 2020 - Scottish Index of Multiple Deprivation - Climate Change (Scotland) Act 2019 - Towards West Edinburgh 2050
Council response and implications for the proposed plan	The recommended evidence sources have been included in the Evidence Report.
Is the agency content with the evidence	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other engagement and matters raised

CEC Transport Strategy and Partnerships: Discussion on transport infrastructure including current and future investment priorities and how infrastructure is used; Council's strategic transport plans including BIF, City Region Deal and WETIP, Council's strategic transport priorities and data collection and traffic counters.

CEC Transport Network Management and Enforcement: Public Transport: Discussion on public transport infrastructure, services, trends and investment priorities including cross boundary considerations; Council's road safety workstreams, plans and investment priorities and ITS systems

Stantec: Discussion with Council's term contractor on availability of transport information/data.

Scotrail and Network Rail: Discussion on baseline information and draft questions relating to Evidence Report.

West Lothian Council: Discussion on cross boundary transport.

- **Draft Topic Paper (November 2025)**

CEC Strategy and Partnerships: Discussion on the WETIP programme and Council's involvement in SEStransit and cross boundary studies.

- **Final Topic Papers (March 2026)**

Network Rail: Recommendations on inclusion of information on rail freight.

Edinburgh Airport: Recommended inclusion of reference to Edinburgh Airport, specifically around safeguarding of land for expansion and proposed new access roads.

Summary of implications for the Proposed Plan

Transport infrastructure and its role in placemaking will be key to ensuring City Plan 2040 is place-based and focused on new development's role in making Edinburgh a healthy, connected city where people can move around without the need to own a car.

It is important that the Proposed Plan supports and helps to deliver the City Mobility Plan if the city is to continue to deliver sustainable transport modes alongside national and regional focussed projects.

The spatial strategy of the Proposed Plan will play an important role in reducing emissions from transport and achieving net zero. This includes modal change, encouraging active travel and public transport, reducing the need to travel by locating development in sustainable locations, and decarbonising existing modes.

Key implications for the Proposed Plan are:

- Commitment to producing a Transport Appraisal is essential to inform the spatial strategy of the plan and to assess potential implications. The Transport Appraisal must take account of past development, committed development and land allocations in the Council's current plan and emerging options for new development. It must also recognise current and planned transport infrastructure including actions set out in policies and strategies such as STPR2 and City Mobility Plan. This includes current and future public transport infrastructure and services such as tram, rail and bus improvements.

  This Evidence Report will provide implications and baseline evidence that the Council's term contractor will use to form the basis of the Transport Appraisal. When options for any potential development sites have been selected,

appraisal of those sites will be undertaken as a key element of the appraisal process.

Early engagement with Transport Scotland will be key to producing the Transport Appraisal. This will include collaboration on the scoping and methodology that will frame the Appraisal and will be continued throughout the entire appraisal process.

- While a Transport Appraisal will use modelling and forecasting, development of the Proposed Plan will also have to be informed by robust transport data. The Council has created an internal data working group to further improve data collection, share knowledge and identify data opportunities. The group has made progress on identifying priority data for mobility and transport in the city, and the recruitment of additional capacity in ITS/data, funded by LEZ surplus.

- Transport elements of the Proposed Plan will be developed in line with the Sustainable Transport Hierarchy, ensuring that active and sustainable modes are the default options for new development. This will be complemented by other policies and strategies including national and regional transport strategies and the City Mobility Plan.

- Work done to inform development of the Proposed Plan must consider cross boundary issues. Midlothian, West Lothian and East Lothian's current local development plans all include allocated sites or proposed development close to their borders with Edinburgh. In some cases, this development is low density housing which may encourage car use that will impact Edinburgh. It will be essential to review ongoing development in preparing the Proposed Plan with the emerging plans of neighbouring local authorities and those in the wider region, recognising the scale and type of development and potential increase in cross boundary/regional demand. Through the SEStransit project, a transport consultancy has been engaged to undertake cross-boundary studies reviewing public transport connectivity across the wider SEStran region. The study will establish patterns of demand and travel in the region and identify provision gaps. It will further look at what services are needed to cater for existing and future demand and when they will be needed.

- Sheriffhall roundabout is a key element of the trunk road network but has been identified as experiencing capacity issues at certain times. The final decision on proposed changes to the Sheriffhall roundabout, and what this means needs to be considered in the Transport Appraisal and Proposed Plan. While there are few other major issues identified on the trunk road network in terms of congestion hotspots, traffic flows such as in the north-west from Fife

and the south-east from East Lothian and Midlothian have increased significantly over the last 10 years; it will be important for the Proposed Plan to recognise this and factor it into spatial planning.

- Projects such as West Edinburgh Transport Improvement Programme and West Edinburgh Placemaking Framework have implications for the Proposed Plan. The work being done to improve public transport and active travel routes in West Edinburgh and into West Lothian will have positive impacts in terms of sites already allocated and consented, including the sites adjacent to the A8 between Gogar and Ratho, but also implications for the future spatial strategy. While there may be challenges with funding, there will opportunities through the collaborative regional work and funding through the SEStransit programme. SEStransit will also influence spatial strategy in other parts of the city, including in the south and linking into Midlothian and East Lothian.

- Continuation of elements of City Plan 2030, including carrying forward of transport interventions, need to be part of the Proposed Plan and its proposed Delivery Programme as many are still programmed.

- The Proposed Plan needs to consider how to ensure that the existing and new places where people live, work and visit are well served by sustainable transport options. This includes the need to safeguard future routes for active travel and public transport, including potential tram routes and tram/train routes which could open up land for development. From the series of Place Profiles that have been produced, one of the key areas examined is movement, specifically active travel, public transport, traffic and parking within each ward. The Proposed Plan must consider the findings of the Place Profiles to fully understand how it can support all residents to move around their area and connect into the city.

- Development of the plan will be undertaken against the backdrop of an increasing and ageing population. The transport elements enabling development will need to incorporate sustainable transport options that meet the needs of all ages and abilities. Transport planning will also play a key role in improving both physical and mental health through increased infrastructure for, and promotion of, active and sustainable transport options. When preparing the Proposed Plan, regular engagement with partners including NHS Lothian will be vital.

- Use of on-site delivery and developer contributions to provide transport infrastructure will likely be a vital component of the Proposed Plan. The Delivery Programme will be developed in conjunction with the Proposed Plan to support this.

- Dealing with freight and servicing will be a key element of the plan. The increase in LGV movements, including the rise of home deliveries, is an issue which should be considered. This will include consideration of options including delivery hubs allowing opportunities for smaller/more efficient vehicles such as cargo bikes. Ensuring HGVs and larger vehicles do not impact on placemaking aims will also be a key consideration. This will involve collaborative work with SEStran and other local authorities.

- There may be opportunities to increase movement of freight by rail, thereby reducing levels of road freight. Increased use of freight sites at Leith Docks and Portobello has the potential to reduce HGV traffic on the city's roads. The South Suburban line is currently used as a rail freight artery; this should be considered in any plans for alternative uses of the line.

- Collaborative working with partners should continue to ensure that priorities are aligned. This will contribute to improving health and wellbeing, addressing poverty and achieving the objectives of the Council's climate adaptation, mitigation and emission reduction policies.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

01b: Infrastructure - education

Topic	**01b: Infrastructure - education**
Description of topic	Review of Edinburgh's education infrastructure needs and capacity, including condition and planned additional capacity
Information required by the Act	Section 15(5) • the infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education facilities); • how that infrastructure is used; • the education needs of the population of the district; and • the capacity of education services in the district.
Relevant NPF4 Policies	Policy 18 Infrastructure first
Linked topic papers	• Topic 01a Infrastructure - transport • Topic 01c Infrastructure - health and social care • Topic 06 Green blue infrastructure, open space and recreation • Topic 11 Design, quality and placemaking • Topic 12 Housing land • Topic 14 Student accommodation • Topic 15 Local living • Topic 16 Health and wellbeing • Topic 17 Community wealth building • Place Profiles
Local Development Plan Guidance	Information on infrastructure capacity, condition, needs and deliverability within the plan area and cross-boundary. This may relate to existing and planned infrastructure. Education capacity includes: early years, primary, secondary, additional support needs and further and higher education services. It should include reference to the Learning Estate Strategy, primary school capacity guidance and School Estate Statistics Stakeholders expected to inform the preparation of the Evidence Report are public and private infrastructure providers, for example higher education institutions. An infrastructure first approach should underpin all aspects of plan making with infrastructure considerations at the heart of place making. This means undertaking early engagement, evidence gathering and where possible data sharing, including with public and private infrastructure providers. This approach also offers potential benefits for infrastructure providers with regard to informing their own plans and strategies.

List of and links to evidence	• **CD116** A National Mission with Local Impact: Infrastructure Investment Plan for Scotland – 2021-22 to 2025-26, Scottish Government, February 2021 • **CD059** City Plan 2030 Delivery Programme, City of Edinburgh Council, January 2025 • **CD062** City Plan 2030 Education Appraisal, City of Edinburgh Council, September 2021 • **CD047** City Plan 2040 Evidence Report Education Infrastructure – Background Report March 2026 (Draft) • **CD276** Council Budget 2026-2036, City of Edinburgh Council, February 2026 • **CD132** Determining primary school capacity: guidance for local authorities, Scottish Government, October 2014 • **CD086** Edinburgh 2050 City Vision, City of Edinburgh Council, 2023 • **CD299** Edinburgh's Learning Estate Strategy 2021: Investing in New Buildings: Guiding Principles, City of Edinburgh Council, October 2021 • **CD044** Housing Land Audit 2025 (Appendix 1), City of Edinburgh Council, 2025 • **CD045** Housing Land Audit 2025 (Appendix 1A) 2025, City of Edinburgh Council, 2025 • **CD159** Learning Estate Strategy, Scottish Government, September 2019 • **CD100** National Planning Framework 4, Scottish Government, February 2023 • **CD057** Report of Examination of City Plan 2030, Department of Planning and Environmental Appeals, March 2024 • **CD349** Report to Planning Committee: City Plan 2030: Supplementary Guidance on Developer Contributions and Infrastructure Delivery – finalisation, City of Edinburgh Council, December 2024 • **CD353** Report to the Education, Children and Families Committee : Learning Estate Update: 2022 based School Roll Projections and Secondary Capacity Review, City of Edinburgh Council, April 2023

List of matters covered

This topic paper considers the following in relation to:

- primary and secondary school capacity
- condition, suitability and investment
- Specialist schools/additional support needs
- early years
- further and higher education.

Summary of evidence

National context

Scotland's Infrastructure Investment Plan 2021-22 to 2025-26 notes that it is a sustainable development goal to 'ensure inclusive and equitable quality of education and promote lifelong learning opportunities for all.' It sets out that there shall be a £2 billion Learning Estate Investment Programme, with local authorities providing most of this and Scottish Government contributing around £635m to £705m.

Scotland's Learning Estate Strategy: Connecting People, Places and Learning also recognises that the learning estate has value in terms of the 'opportunity for a place-based approach to improve local outcomes, co-ordinating and integrating local services to support communities.'

The legislative education context is also relevant, with the following sections particularly highlighted:

- Section 1 of the Education (Scotland) Act 1980 places a duty on education authorities to secure adequate and efficient provision of school education, 'school education' includes (i) early learning and childcare, (ii) provision for special educational needs; (iii) the teaching of Gaelic in Gaelic-speaking areas.
- Section 17 of the Education (Scotland) Act 1980 requires authorities to provide sufficient accommodation in schools and other educational establishments under their management.
- The School Premises (General Requirements and Standards) Regulations 1967 (as amended) sets out standards, including minimum requirements for school sites, playing fields and educational accommodation.

Local context

Edinburgh's Learning Estate Strategy 2021: Investing in New Buildings: Guiding Principles sets out core themes. It emphasises the importance that learning spaces should provide the best conditions for learning and that 'every learner has the right to be educated in their community and, where possible, in their local school or early years setting.'

Edinburgh's Learning Estate Strategy 2021 also reinforces and expands on the Scotland's Learning Estate Strategy by setting out the vision 'for a place-based approach to learning and community infrastructure investment. The ambition is for inclusive, community lifelong learning hubs, where public services can be co-located with links to travel networks, green infrastructure and strategic public transport networks.' It also explains that the learning estate 'should contribute to meeting Edinburgh's net-zero carbon and sustainability objectives.'

Primary and secondary school capacity

Within the City of Edinburgh Council area, there are a total of 124 schools as follows:

- 76 non-denominational primary schools
- 15 Roman Catholic primary schools
- 20 non-denominational secondary schools
- 3 Roman Catholic secondary schools, and
- 10 special schools

There is one Gaelic-medium education primary school, Bun-sgoil Taobh na Pàirce. Its catchment area covers the City of Edinburgh Council's administrative area and also that of East Lothian, Midlothian and West Lothian council areas. James Gillespie's High School provides Gaelic-medium education (GME) as part of its curriculum housed in the Darroch Annexe which opened in October 2022. The capacity of the Darroch Annexe is 399 pupils. In 2025/26, 253 pupils – 14% of overall school roll – attended James Gillespie's to continue GME.

The maps below show school current occupancy for Council-run primary and secondary schools. This uses information from the Education Infrastructure background Report 2024 and provides up to date school rolls alongside current school capacities and catchments.

Rolls for special schools are addressed in the later section of this paper on Additional Support Needs (ASN).

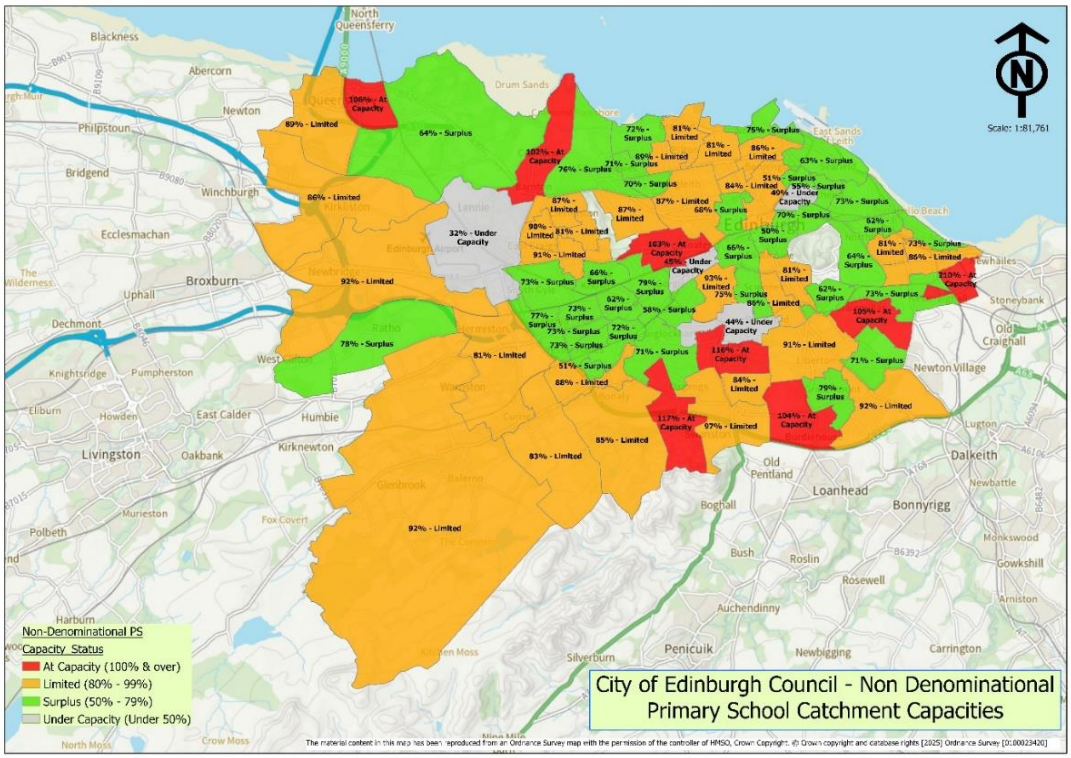


Figure 01b.1: Current capacity of the Council's non-denominational primary schools (note: full scale maps are also provided as core document)

The information for projected peak capacity for non-denominational (ND) primary schools shows that generally, some capacity is projected to be available, although this is limited for many schools. There are some schools that are projected to be overcapacity (over 100%).

Spatially, there is more of an issue to the south of the city. Newcraighall Primary School is particularly overcapacity at present, with new development in this area coming online and generating pupils and this is due to continue. However, this is proposed for replacement with a larger primary school to address capacity issues.

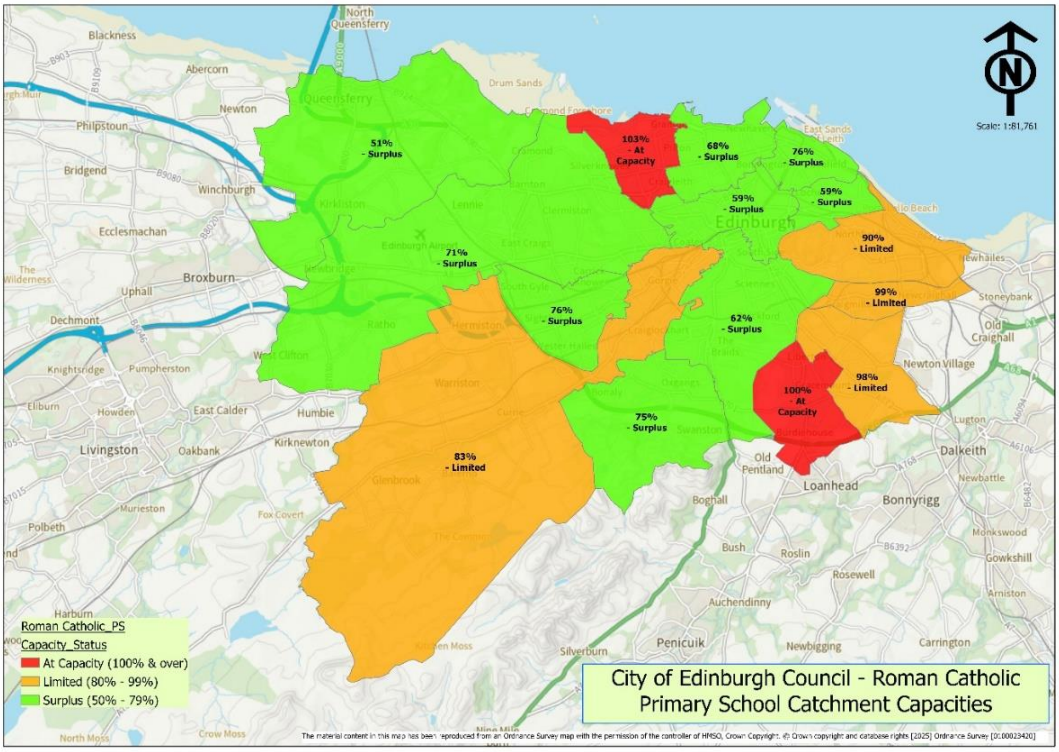


Figure 01b.2: Current occupancy of the Council's Roman Catholic primary schools (note: full scale maps are also provided as core document)

For Roman Catholic primary schools, capacity is projected to be available generally across the city, with more limited capacity to the east and south-west and some specific schools facing capacity issues.

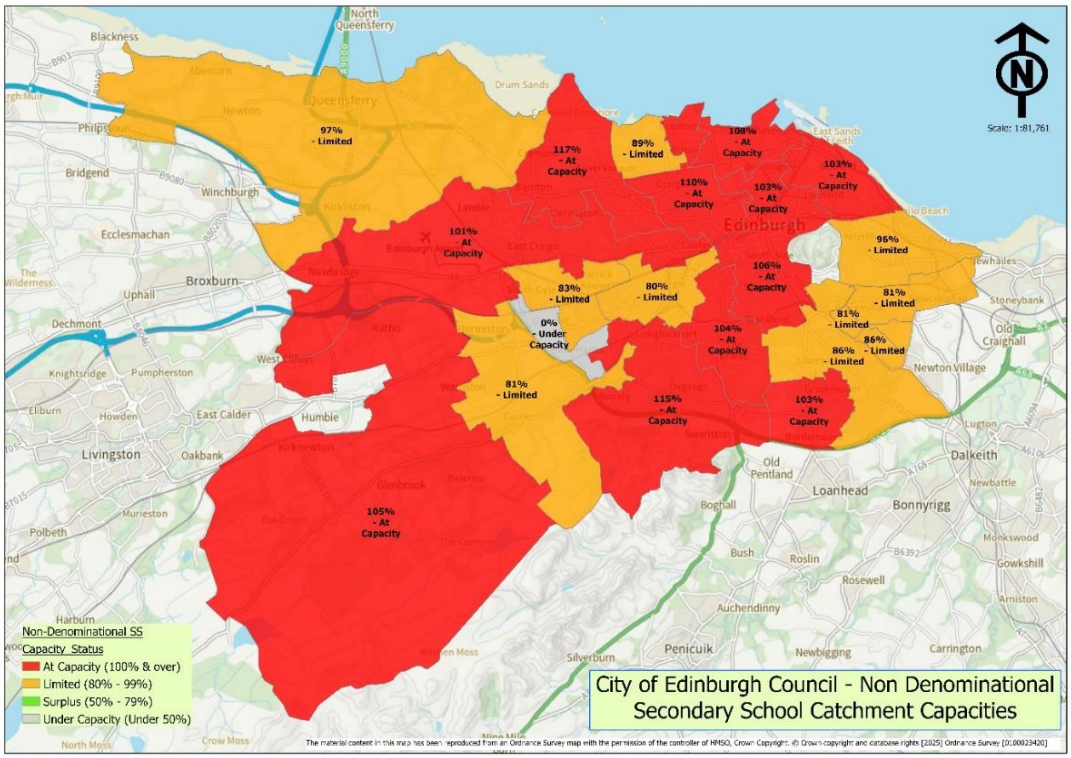


Figure 01b.3: Current occupancy of the Council's non-denominational secondary schools (note: full scale maps are also provided as core document)

Overall, there is less capacity projected to exist in non-denominational secondary schools compared to non-denominational primary schools. There are no schools with surplus capacity (50 to 80%) or which are under capacity (less than 50%).

There is a small cluster of schools with limited capacity in the south-east and south-west of the city.

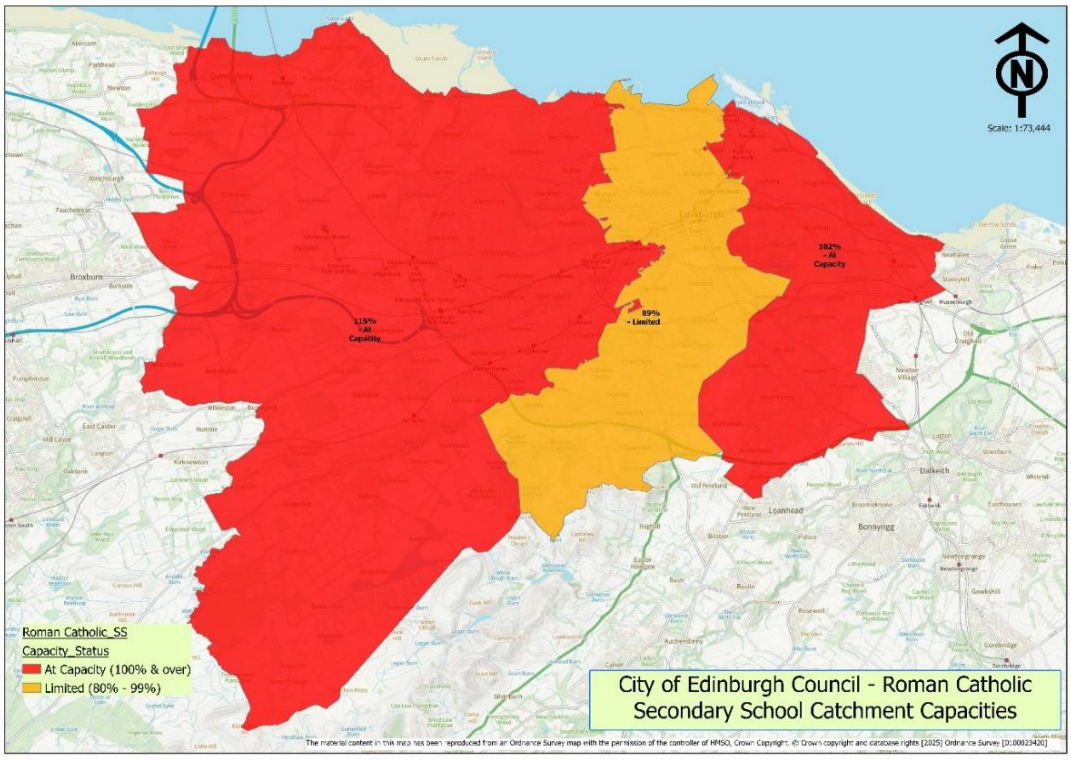


Figure 01b.4: Current capacity of the Council's Roman Catholic secondary schools (note: full scale maps are also provided as core document)

Two of Edinburgh's three Roman Catholic secondary schools are over capacity. Only St Thomas of Aquin's is not over capacity, but this is limited with capacity at 89%.

Further information showing the year-by-year breakdown of future projected capacities is shown in the Education Infrastructure – Background Report March 2026, including accounting for the effect of development in the most recent Housing Land Audit (HLA). The report also identifies planned capacity changes and projects the impact of City Plan 2030 sites that are not in the HLA, which includes factoring-in programming for these found in the LDP Delivery Programme.

In preparing the proposed plan the latest updated information will be used to produce a revised 'baseline'. The methodology proposed will be the same as set out in the Education Infrastructure – Background Report March 2026 and in the report to the Education, Children and Families Committee in April 2023.

This methodology is in line with that used by the Council in the Education Appraisal produced in 2021 for the adopted LDP. This was assessed as part of the Examination of City Plan 2030. The calculation of capacity has had regard for Determining primary school capacity: guidance for local authorities.

In terms of the projections, Education Infrastructure – Background Report, the following tables and commentary have been provided to give a statistical overview of school capacity compared to the spatial mapping set out above.

	Over capacity >100%	Near Capacity 80-100%	Optimum Operating Capacity 50-80%	Under Capacity <50%
Non-denominational primary schools	8	28	36	4
Denominational primary schools	2	4	9	0
Total	10	32	45	4

Figure 1b.5: City wide analysis of projected primary school capacity (Source: Education Infrastructure – Background Report)

For primary schools, 90% of the Council's non-denominational (ND) and Roman Catholic (RC) primary schools are projected to operate within capacity.

There are some exceptions where capacity is projected to be exceeded, although this is usually in the range of 100% to 110%. South Morningside (116%) and Colinton (117%) are forecast to be partially higher again however projections show projected rolls falling by 8% by 2027. The most significant issue is at Newcraighall Primary School where the impact of new development would result in capacity being 210% however the Council has planning permission for a new primary school (planning application ref. 23/07343/AMC, granted June 2024) to address this situation.

	Over capacity >100%	Near Capacity 80-100%	Optimum Operating Capacity 50-80%	Under Capacity <50%
Non-denominational secondary schools	11	8	1	0
Denominational secondary schools	2	1	0	0
Total	13	9	1	0

Figure 01b.6: City wide analysis of projected secondary school capacity (Source: Education Infrastructure – Background Report)

For secondary schools, a much higher proportion of these are projected to be close-to or over capacity compared to primary schools (22 of 23 schools).

Figure 01b.6 above shows 13 of the 23 secondary schools being over capacity but planned capacity changes would result in the number of over-capacity secondary schools falling to 9. Of the schools that would remain over-capacity, most would be between 100-110%. However, three are forecast to exceed this level: Firhill (115%), Royal High (117%), St Augustine's (115%).

The Council operated Gaelic Primary school (Bun-sgoil Taobh na Pàirce) serving the City of Edinburgh, West Lothian, Midlothian and East Lothian council areas has a capacity of 462 pupils and a 2025/26 year school roll of 434 giving an occupancy of 94%.

For secondary school Gaelic provision, the Darroch annexe at James Gillespie's has a capacity of 399 and a pupil roll of 253 pupils in the year 2025/26 (63% occupancy). It is noted that pupils at the annexe will be taking some subjects in English.

Condition, suitability and investment

The tables below summarise the latest available condition and suitability rating of Council operated primary schools.

School condition surveys are generally less than five years old, although there are the occasional schools with older surveys. The suitability information is based on 2009 surveys, though this information is not expected to have changed significantly in the interim. The City Plan 2040 Evidence Report Education Infrastructure – Background Report March 2026 (Draft) provides a full breakdown of condition and suitability by school whilst the tables below summarise overall condition and suitability by school type for Council operated schools.

	Condition	Suitability
A rating	28	18
B rating	48	45
C rating	0	13

Figure 01b.7: Non-denominational primary school condition and suitability summary information

	Condition	Suitability
A rating	8	6
B rating	6	7
C rating	1	2

Figure 01b.8: Roman Catholic primary school condition and suitability summary information

	Condition	Suitability
A rating	14	11
B rating	3	5
C rating	3	4

Figure 01b.9: Non-denominational secondary school condition and suitability summary information

	Condition	Suitability
A rating	2	1
B rating	1	2
C rating	0	0

Figure 01b.10: Roman Catholic secondary school condition and suitability summary information

	Condition	Suitability
A rating	6	4
B rating	4	2
C rating	0	4

Figure 01b.11: Special school condition and suitability summary information

Overall, the Council's school stock is in generally good condition and is suitable for educational needs. A significant majority of schools are A or B rated for condition and suitability. It is recognised there are some schools with a C rating, with this mainly relating to the suitability rating rather than the condition rating.

The Council has committed to a significant level of capital investment in the school estate with over £396m investment allocated in the Council's capital expenditure plan for new school infrastructure as set out in the Council Budget 2026-2036. Some of this spending is on new schools but nearly £100m is allocated for existing schools and a further £29m is allocated to special schools. Full details on which specific schools will be affected by this spending is not yet determined however it is anticipated that school condition and suitability ratings may be positively affected by this spending.

In terms of new Gaelic school infrastructure, this was addressed as part of a report to Education, Children and Families Committee on Gaelic Medium Education on 1 May 2025. This report set out that a site for a new Gaelic medium education school still had to be secured and there is no capital budget allocated. There are also issues recruiting Gaelic medium teachers.

Special Schools/Additional Support Needs

The Council holds a limited amount of central data on additional support needs pupils and support needs.

The majority of additional support needs (ASN) pupils are those for whom English is a second language, although there are a range of other ASN pupils such as those with learning disabilities which it is important to recognise.

The Council has school rolls for 10 specialist schools, with these comprising a mix of primary, secondary and all-through schools. The information is set out in table Figure 01b.12.

School	Total number of pupils as of 10/09/25
Braidburn (all-through)	122
Kaimes School (secondary)	97
Oaklands School (all through)	61
Pilrig Park School (secondary)	66
Prospect Bank School (primary)	49
Redhall School (primary)	72
Rowanfield School (primary)	57
St Crispin's School (all through)	76
Westfield Secondary School (secondary)	47
Woodlands School (secondary)	86

Figure 01b.12: 2025 school rolls for City of Edinburgh special schools

Early years

Early years childcare can take a wide range of forms, including at dedicated nurseries and as part of early years provision associated with schools.

The Council has information on capacity, rolls and occupancy rates for each of its own 108 facilities. As of January 2026, these collectively have a capacity of 7122, with 5366 children on the roll meaning there are 1756 spare places and an occupancy rate of 75%.

The Council is in partnership with 92 partner providers and 31 childminders to deliver funded entitlement to early learning and childcare. The Council only has information on the number of funded places provided by partners. It does not hold information on their overall capacity or other non-funded places these partners provide. In total, these partners are providing 3348 funded places, as of January 2026.

When the total capacity of Council's own facilities is added to the places the Council funded provided by partners, this provides a 'total places' figure across the Council area of 10,405 with 9,249 of these being utilised. Early years childcare places are not 'aligned' to a particular school or catchment the way that Council operated primary and secondary schools are. Figure 1b.8 below breaks down places available within each non-denominational secondary school catchment to provide a spatial understanding of where places are provided and the utilisation of these in different areas.

	Total places	Roll '25	Projected early years childcare intake									
			'26	'27	'28	'29	'30	'31	'32	'33	'34	'35
Balerno	176	152	154	149	139	151	154	156	157	161	161	162
Boroughmuir	631	530	486	501	515	515	530	536	543	548	553	555
Broughton	868	810	731	735	748	767	785	794	802	809	821	824
Castlebrae	548	411	379	362	380	389	396	403	407	410	415	419
Craigmount	778	698	535	596	665	610	624	635	640	645	652	655
Craigroyston	505	397	383	371	377	394	401	406	414	417	420	421
Currie	291	272	289	294	303	305	314	318	323	324	326	332
Drummond	392	377	346	307	319	347	353	357	364	367	368	369
Firrhill	625	586	565	542	508	555	564	574	579	586	591	593
Forrester	457	357	412	429	448	443	448	462	466	469	471	479
Gracemount	313	301	352	366	359	371	377	382	387	389	393	396
James Gillespie's	702	543	511	485	489	518	529	537	541	545	549	554
Leith	555	509	541	521	537	558	571	577	586	590	593	598
Liberton	691	649	739	775	764	779	792	805	814	822	833	836
Portobello	482	597	470	503	482	497	504	512	518	525	528	530
Queensferry	525	445	561	559	553	583	593	600	604	612	617	621
Royal High	519	530	521	522	500	530	541	547	555	559	563	565
Trinity	498	389	402	373	390	406	414	422	428	433	435	436
Tynecastle	518	437	506	477	485	508	519	526	532	535	541	546
Wester Hailes	331	260	179	167	173	181	185	188	189	191	194	197

Figure 01b.13: Projected early years childcare intake
(Note: total places calculated by adding all places at Council facilities with Council funded places at non-Council facilities)

The above projections are based on projecting forward past trends but do not include the effect of new housing developments. Given housing developments will be built during the next 10 year period then an additional intake of early years childcare children should be expected, especially in areas where new housing is to take place.

When comparing 2025/26 rolls with total places available, most areas have places available, except the Royal High and Portobello (which has rolls significantly exceeding places). Projections show increasingly fewer catchment areas with places

available over the next ten years however, with almost half of the catchment areas projected to exceed the total places (9 of 20).

Education Background Update

In May 2026, the Council produced an updated Education Infrastructure Background Report 2025 which factors in the 2025 Housing Land Audit. The updated projections for 2025/26 using the new HLA do not significantly change the analysis in the topic paper. Both reports show similar numbers of schools are operating either at near capacity, optimum operating capacity or under capacity. The updated evidence does show there has been a partial increase in the number of schools projected to be overcapacity. The Education Infrastructure Background Report 2025 is also included in the core documents to the Evidence Report.

Further and Higher education

The Council area contains three universities: University of Edinburgh, Edinburgh Napier University and Heriot-Watt University, as well as one major further education provider Edinburgh College. Queen Margaret University is located just outside the Council area. The presence of these higher and further education providers contributes to the city's economy, diversity, and vibrancy and is an essential component of Edinburgh's character as well as the city's standing as a place of international learning.

Most providers have a number of facilities spread throughout the city, with the University of Edinburgh having many facilities within the city centre and to the south. Heriot-Watt sits as a self-contained campus to the south-west.

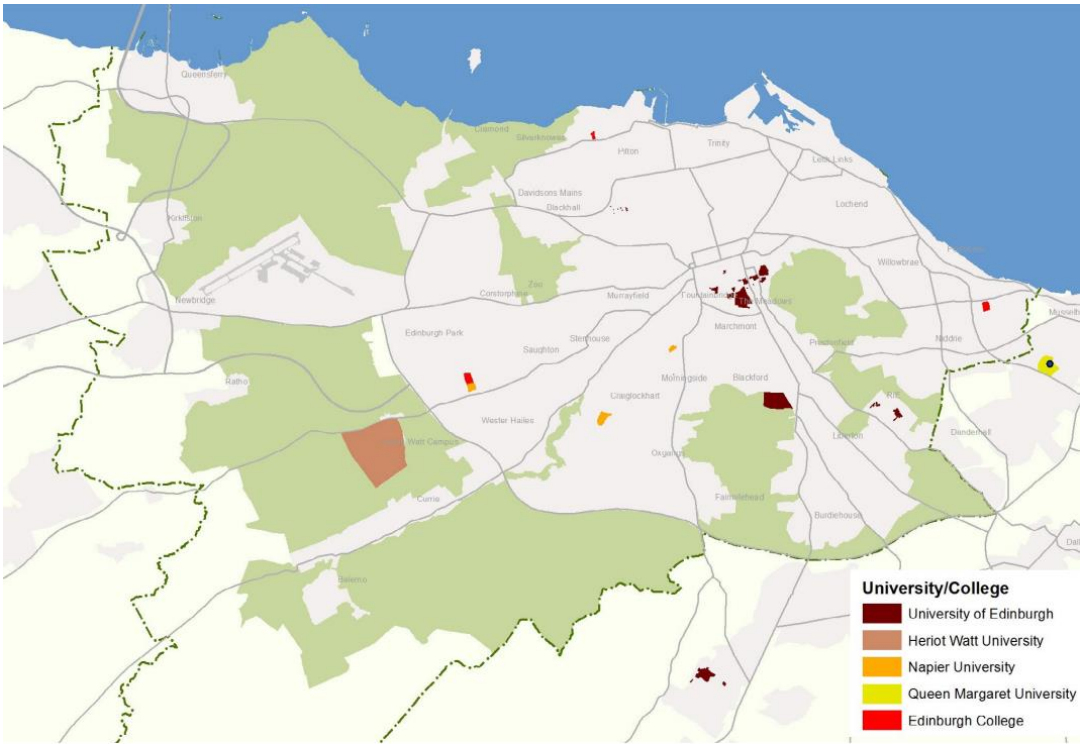


Figure 01b.14: Higher and further education main academic buildings

The Council has consulted with providers as part of the Evidence Report process and will continue to engage with higher and further education providers in preparation of the Proposed Plan including consideration of any land needs, accommodation and transport considerations.

Topic paper Student accommodation contains data on the number of students at each institution.

Summary of stakeholder engagement

Key Stakeholder	Homes for Scotland
Main views raised	• **Scoping (May 2025):** Highlighted the relevance of the following guidance: Ensuring viable capacity figures are use - Determining Primary School Capacity Guidance (2014) Scottish Government. • **Final Topic Papers (March 2026):** Several evidence sources are suggested, including Household Projections for Scotland (2022-based), case studies on identifying detailing actual school capacity and a Council report to Education Committee regarding secondary school capacity. Disagree with 80% optimum capacity and refer to Scottish Futures Trust (SFT) work on capacity optimisation suggesting closer to 100%. Other councils have done this. Homebuilders may be willing to contribute towards this work to reduce potential developer contributions. The Council should adopt a sequential approach to creating additional capacity where catchment reviews should be given higher priority to reduce the potential capital and associated revenue costs of altering or extending existing schools. The Council's methodology fails to adopt the phased addition of pupils to (and from) the school roll based on programming set out in the Housing Land Audit. Consequently, this substantially overstates the scale of impact of pupils from new housing. The current PGR sample is drawn from a period of higher birth rates and it is based on selective sample. Birth rates have fallen to historic lows recently which are not yet reflected in the PGR. The Council should also provide information to demonstrate that its PGR calculations are drawn from a statistically sound representative sample. Updates to the PGR are required. The current Council approach of adding the peak pupil generation to the most recent peak in the school rolls systematically overpredicts the impact of development. The Council should model the impacts rather than just adding peak PGR for all developments at the same time to the most recent peak in school rolls.

	The Council's cumulative approach ignores the transitioning of pupils from P7 to S1 and then out of secondary schooling. The Council should use the cohort progression model used by other Lothian authorities. The Council's reasons for rejecting this model are insufficient. HFS's 2024 response to proposed changes to the education contributions set out in City of Edinburgh's Supplementary Guidance on Developer Contributions and Infrastructure Delivery for City Plan 2030 is relevant to the evidence associated with education provision and delivery of homes in the City HFS's view is that if the intention is to establish a baseline, existing housing allocations that have not commenced should not be taken into account given that they will be reassessed and potentially deallocated as part of the review of housing land. If initial contributions are too high it will deter investment in new homes. A 30-year clawback period for education contributions is unreasonable. It is well beyond the point at which the Council considers the peak roll will occur. Appendix 4 indicates that the peak roll occurs 5-7 years after the development is complete. It is easier to predict future school rolls than the state of the financial markets. HFS disagree with the Council regarding continuing projection trends when turning points can be predicted such as a fall in birth rates or the completion of development. The Council should utilise the SFT floorspace per pupil requirements and cost rate. The Council's floorspace per pupil requirement is over 25% higher than SFT's and increases the budget costs of mitigation by a similar percentage. Revenue costs will also be greater as a result. Within Appendix 1 the Council set out the planned capacity for schools once they have been extended. Either within the table or explanatory note the Council should set out what the occupancy percentage would be based on the extended capacity It would be beneficial to split annual completions by flats and houses and what the projected Pupil Generation Rates (PGR) were versus what materialised. HFS ask if an allowance was made for purchasers moving within the

	school catchment. Collectively, this will confirm if secondary school rolls are falling in line with historic trends. Clarity on some figures requested. The Council should however undertake analysis of when the PGR for a new development falls to the same level as the mature established area. This will vary by development size, programmed/actual build-out rate and mix of homes. Smaller developments will be absorbed into the mature established area quicker than larger developments. The 2025 HLA is used given that the deliverability of sites following the publication of the Scottish Government Housing Land Audit Guidance is considered fully in this HLA. when undertaking the cumulative assessment outlined in 7.1-7.4 to account for the over programming. Evidence shows births falling with primary school rolls following. Secondary school rolls should therefore start to fall as they mirror the fall in primary school rolls six years earlier. Some matters are raised that go beyond evidence gathering process e.g. the Council should consider green belt release to maximise school capacity at the edges of the city.
Council response and implications for the proposed plan	The Council have used the most up-to-date information on population and pupil projections at the time of producing the Evidence Report. Education Projections are produced annually and updated appraisals will be taken account of in preparing the Proposed Plan. It is expected that an updated Education Appraisal is to be produced by summer this year. The updated appraisal will use the latest information available, including NRS projections. As a result, it is not necessary to separately and additionally refer to the household projections. The Council is content with how it has addressed NRS data. The Council is presently reviewing capacity of schools within its estate with a view to finding more efficiency and the best practice case studies are noted in this regard. There is an ongoing review of secondary school provision as set out in the Report to Education, Children and Families Committee (April 2024) on Learning Estate Update: 2023 based School Roll Projections. The Education Infrastructure Background Report contains an explanation of the PGR used by the Council and why this is appropriate, including the use of the sample sites chosen. The report addresses how pupil generation from new development is then applied cumulatively on top of

	'baseline' projected school rolls. The background report also sets out the problems with cohort progression model any why the Council uses a cumulative approach instead. As noted, the Council's projections do account for programming information and it is not necessarily the case that the peak years of pupil generation from sites will always occur in the same year. The approaches above are the same as used by the Council in its Education Appraisal (EA) used to support City Plan 2030. Both the LDP and EA were scrutinised by Reporters during examination, including in relation to similar points of objection as made by HfS above in relation to this topic paper. The Reporters were content with the approaches taken by the Council. The points made for and against the Council's approach as well as the Reporter's conclusions are in the Report of Examination of City Plan 2030. HFS's response to the City of Edinburgh's Supplementary Guidance on Developer Contributions and Infrastructure Delivery for City Plan 2030 is contained in the Report to Planning Committee: City Plan 2030: Supplementary Guidance on Developer Contributions and Infrastructure Delivery – finalisation (December 2024). This also contains the Council's response to these points. The Council's response in that report also addresses the issue of why the Council has a higher cost per sqm than the SFT metric. The occupancy maps shown in this topic paper are based on the 2025 school roll data. The Education Infrastructure Background Report details how different sources of pupil generation have been factored into projections however it is noted in this topic paper that it is appropriate for the development noted in the report to be considered given the expectation of this to go ahead. The Council is aware of catchment reviews as an option however, it is a complex process that goes beyond planning with its own statutory basis and consultation requirements. The Council appreciates contributions play a role in viability of development and this is a material consideration that can be considered in each case. Modelling of impact and infrastructure first principles are still key factors however. The 30 year clawback period used is needed to give time to monitor the reality of development build out rate and numbers and pupil generation which do not always follow initial expectations.

	The Council maintains its position already set out on projection trends and turning points. Adding in an occupancy rate to account for planned capacity in the projections contained in appendix 1 would not be so simple as occupancy rates would vary for each year of projections. The comparative rate of occupancy can already be seen by comparing projected rolls against the planned capacity shown for relevant schools.
Is the agency content with the evidence?	HfS dispute the education projections methodology and some elements of the information base.
Areas of agreement	N/A
Outstanding issues	HfS wish to reduce areas of divergence, however the Council does not agree to changes in modelling methodology.
Actions for proposed plan stage	An updated Education Appraisal shall inform the site appraisal process using the latest data available at that time using the methodology set out in the Education Infrastructure – Background Report. The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other engagement and matters raised

Ongoing work between the Council's Planning service and Learning Estate team builds on previous Education Appraisal work and information sharing including Housing Land Audits, School Roll Projections and school capacities. This has informed the City Plan 2040 Evidence Report Education Infrastructure – Background Report March 2026 (Draft).

From the outset of the Evidence Report process, the Council’s Planning service has consistently maintained a close liaison with the Learning Estate team. This has had several benefits. Firstly, Planning has been able to provide latest and emerging data as required, such as the most recent HLA, and to make clear the key information required for Evidence Report and plan preparation purposes at an early stage. This enabled the production of school projections ahead of time to inform the Evidence Report, which it was important to schedule a good amount of time for given the range and complexity of the information required. This has involved the Learning Estate team routinely attending regular Evidence Report project meetings and further meetings specifically addressing education issues to ensure the information provided now shall also be able to enable site appraisal and plan preparation processes to take place over the next year.

This is in recognition of the importance of education infrastructure as a central issue in plan preparation and delivery of development in line with the infrastructure first principle, as well as to maximise transparency of evidence on an issue of interest to stakeholders

University of Edinburgh

The Council received a response at the scoping stage of preparing the Evidence Report from the University of Edinburgh. The response set out information on the university's current estate within the Edinburgh boundary and their desire to see collaboration with the Council and planning flexibility with regards to future university initiatives, campus / site designation of its wider estate, and improvement of transport links across the city to benefit the student population and the wider city. These aspects have been noted for consideration as part of the Proposed Plan and link to topic papers including Infrastructure Transport and Student Accommodation.

Summary of implications for the Proposed Plan

Early years, primary and secondary school capacity and projections

Based on the 2025 school rolls and Education Infrastructure – Background Report projections, secondary school capacity- both non-denominational and Roman Catholic – represents the most significant potential education constraint. Although planned capacity changes may reduce the number of schools projected to be over capacity, 17 out of 23 secondary schools are still forecast to have no capacity for parts or all of the period up to 2034.

To a lesser extent, the same issue exists for primary schools. Whilst only nine primary schools are forecast to be over capacity, a further 33 are forecast to operate near to their capacity i.e. between 80-100% of capacity. This represents nearly half (46%) of the Council’s primary school provision.

Early years and childcare provision is also indicated to be at or close to capacity in some locations.

For the Proposed Plan, it will be necessary to consider how education capacity levels will impact on locations for new housing development. This will include where provision of new or extended school provision is required to provide for new development, locations for new education provision and consideration of when developer contributions may be required to mitigate the impact of new housing development.

The Education Infrastructure – Background Report sets out the current baseline projections and proposed methodology to consider what mitigation may be required. This baseline information will continue to be updated as the Proposed Plan is produced.

In preparing the Proposed Plan there will be continued work with the Council's Learning Estate Planning service to determine any other education estate needs which may arise.

Further and higher education

The Council has not been made aware of any specific proposals from further and higher education institutions, though the response from the University of Edinburgh have indicated a desire to see their existing areas considered flexibly in the Proposed Plan. The Council will continue to engage with further and higher education providers as the plan progresses.

Specialist schools/Additional support needs

It is noted that there is only limited data currently available on specialist schools and additional support needs. The planning service and the Council's education service will continue to work closely and consider any land use implications in the Proposed Plan.

Statements of agreement / dispute

Homes for Scotland have stated that they do not agree with the Council's methodology for calculating education projections. As noted, the Council consider the proposed methodology, which is also in use for the current LDP, to be appropriate and has been previously tested. The Council will continue to consider projections using updated information as the plan progresses and through responses made during the plan's consultation.

01c: Infrastructure - health and social care

Topic	**01c: Infrastructure - health and social care**
Description of topic	Assessment of health care infrastructure
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** Section 15(5) of the 2019 Planning (Scotland) Act requires the evidence report to: • The health needs of the population of the district; • The infrastructure of the district (including health care facilities); and • How that infrastructure is used. • Section 15 (2A) and Section 15 (2B) of the 2019 Planning (Scotland) Act requires a Local Development Plan to: • Include a statement as to the provision of public conveniences • Include a statement as to provision of water refill locations
Relevant NPF4 Policies	• Policy 15 Local Living and 20 minute neighbourhoods • Policy 18 Infrastructure first • Policy 23 Health and safety
Local Development Plan Guidance	• Infrastructure First (page 67) sets out that an Evidence Report is likely to take include information on infrastructure capacity, condition, future provision and deliverability, within the plan area and cross boundary to inform the early development of the spatial strategy.
Linked Topic Papers	• Topic 17 Health and wellbeing • Topic 15 Local living • Place Profiles
List of and links to evidence	• **CD252** Assessment of Public Toilets, City of Edinburgh Council, 2023 • **CD063** City Plan 2030 - Developer Contributions and Infrastructure Delivery Guidance, City of Edinburgh Council, September 2025 • **CD033** City Plan 2030- Written Statement, City of Edinburgh Council, November 2024 • **CD074** Edinburgh Local Development Plan, City of Edinburgh Council, November 2016 • **CD450** Lothian Strategic Development Framework, Edinburgh Integration Joint Board, August 2022 • **CD100** NPF4, Scottish Government, February 2023 • **CD448** Population Growth and Primary Care Premises Assessment: Edinburgh 2022-2030, Edinburgh Health and Social Care Partnership, November/December 2022

List of matters covered

This topic paper considers the following in relation health and social care infrastructure:

- An assessment of Primary Health Care Infrastructure
- An assessment of public conveniences and water fountains

Summary of evidence

National

National Planning Framework 4 (NPF4) Policy 23 Health and safety requires local development plans (LDPs) to tackle health inequalities particularly in places which are experiencing the most disadvantage. They should identify health and social care infrastructure needed in the area, in partnership with Health Boards and Health and Social Care Partnerships.

Health and social care services are defined in NPF4 as ‘services provided in the community directly by Health Boards and services provided on their behalf by contractors such as GPs, dentists and pharmacists’.

These services fall into the categories of primary care and health and social care detailed as follows:

Primary Care Services:

- General Practice (GP) services
- Pharmacies
- Dentistry
- Optometry

Other Community Health and Social Care Services:

- Children and Families
- Older Peoples Residential and Day Care
- Mental Health and Additions
- Sexual Health
- Homelessness
- Criminal Justice
- Learning Disability

This topic paper focuses on GP services because they are particularly sensitive to the pressures of development as a result of the increased patient demand generated, as almost everyone registers with a local GP. Other primary care services

such as pharmacies, dentists, and opticians are also included as they are important for supporting local living under the provisions of NPF4 Policy 15 Local Living and 20 minute neighbourhoods. The importance of accessing services and facilities is addressed in Topic 15 Local living and Topic 17 Health and wellbeing. The Place Profiles provide more detailed information on a ward basis including the findings of the place-based engagement and how people feel about access to health care in their area.

Regional

The Lothian Strategic Development Framework (LSDF) sets out NHS Lothian's core healthcare strategy. The strategy sets out a five-year vision of what will happen across Lothians' Health and Care system until 2028. It is a collaboration between the following bodies:

- East Lothian Integration Joint Board
- Edinburgh Integration Joint Board
- Midlothian Integration Joint Board
- NHS Lothian
- West Lothian Integration Joint Board

The vision of the Framework is as follows:

- Citizens live longer, healthier lives, with better outcomes from the care and treatment provided
- Connecting health and social care services seamlessly, wrapping around the citizens in their home
- Improve performance across the system, with better experiences for citizens and those who work for and with us.

The LSDF focuses on three broad aims for improvement:

- **population health** by tackling health inequalities, increasing prevention and promoting healthier lifestyles
- **how it works with people**, by increasing citizen and patient engagement and ensuring care is delivered to high standards, and
- **performance**, by delivering key healthcare performance measures.

The strategy has a number of core strategic themes, as follows:

1. **Care closer to home**; shifting care from hospitals to community based settings, focusing on the patient's home as a central point for service design
2. **Self care and prevention**; empowering citizens to manage their own health and prevent illness, especially in young people
3. **Partnership working**; collaborating with local authorities, the third sector, education institutions and other public sector bodies

4. **Embedding pandemic lessons**; incorporating sustainable changes and practices learned during the Covid 19 pandemic into all aspects of healthcare delivery
5. **Workforce and Culture**; attracting and retaining skilled staff, promoting diversity and inclusion, and fostering a person-centred approach to care
6. **Research and innovation**; embedding clinical research into routine care to improve quality, processes and outcomes for patients.

The strategy also recognises the impacts of Covid-19, not just the direct impacts but the associated impacts including the rapid increase in waiting times of scheduled care and the difficulties of providing services by independent sector care providers and the impacts on those working in the health sector.

The strategy sets out five-year plans for various matters including children and young people, mental health and wellbeing, primary care services, unscheduled care, and scheduled care. It will be implemented through integration, as NHS Lothian works with the various integration joint boards, health and social partnerships and various other bodies. It will also be delivered through a range of detailed supporting strategies for example, the Green Health Strategy and the Work Well strategy. It will also be implemented through an approach of continuous improvement, by utilising quality management and embedding learning from the pandemic, to continuously improve services.

Local

Edinburgh Local Development Plan (2016) and City Plan 2030 (2024)

The Council has taken a pro-active approach to the provision of new infrastructure, including health infrastructure seeking to identify requirements alongside proposals for new housing development in line with national policy.

Policies in both the Edinburgh Local Development Plan 2016 and City Plan 2030 required developer contributions, and/or provision of, any necessary health and other community facilities relative to the impact and scale of development proposed. Those policies were endorsed through Examination and formed the basis for draft and more recently, approved developer contributions non-statutory guidance. This has resulted in a significant level of developer contributions for primary health care infrastructure secured through Section 75 legal agreements on planning permissions.

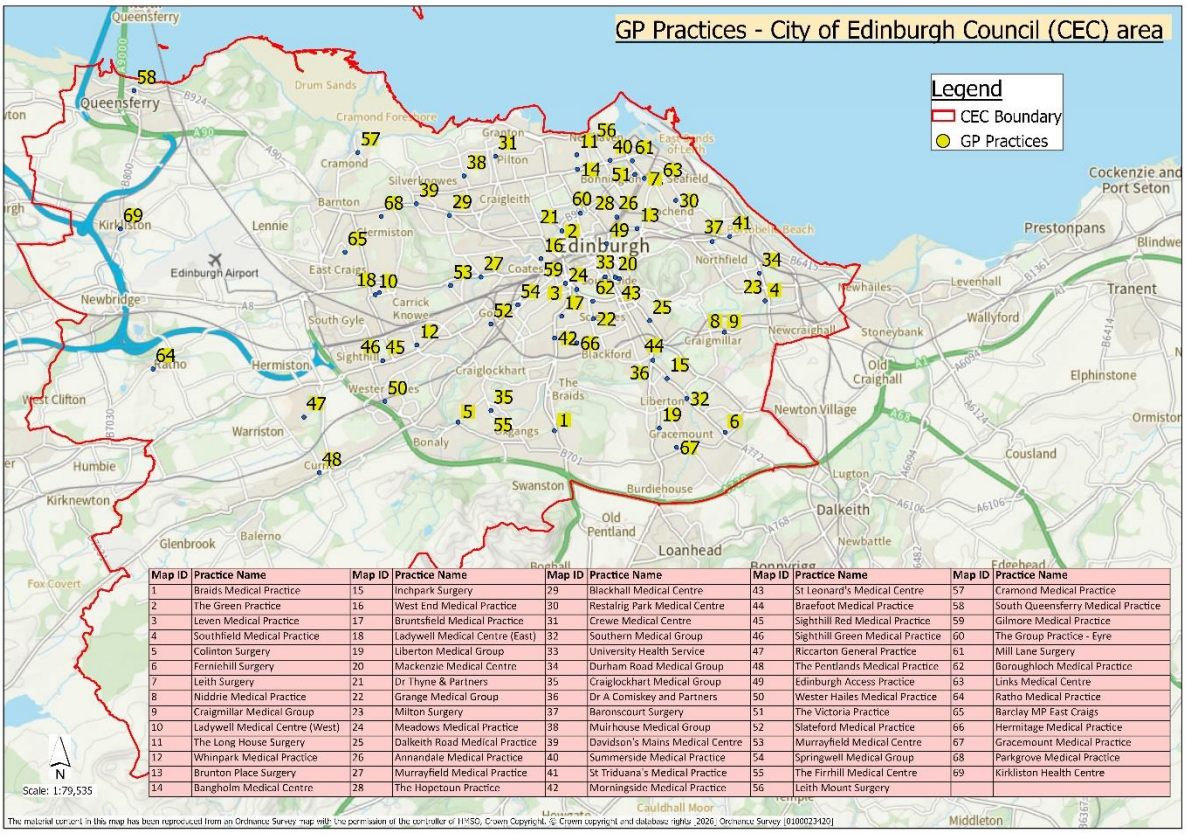
Such an approach has been based on assessment of need for new medical practices and expansions to existing practices with costed actions and a per dwelling rate in mapped Healthcare contribution zones. Some of these identified actions had been front funded and delivered in advance of the development to ensure capacity was in place as residents moved in. The cost of these were noted as ‘sunk costs’ by

NHS Lothian and in these cases contributions need to be collected retrospectively until relevant costs are recovered.

City Plan 2030's approach to healthcare contributions has also been scrutinised by an independent reporter for a Section 75A appeal. The DPEA appeal (reference POA-230-2018) was dismissed and the reporter found the Council's methodology sound.

Existing Health Care Infrastructure

Primary care services in Edinburgh include General Practice (GP), which generally operate as independent practices. There are 69 GP practices in Edinburgh as shown on Figures 01c.1 and 01c.2. In addition to GP practices, primary care also includes other NHS and independently contracted services such as dental, optometry, pharmacy and community services. These community services include community nursing and rehabilitation teams, health visitors, midwives and Allied Health Profession clinics e.g. physiotherapy services. These primary care services are relevant when considering overall capacity pressures due to the effect of population changes on them. The primary care services are also mapped in the Place Profiles which form part of the Evidence Report.



Map ID	Practice Name	Map ID	Practice Name	Map ID	Practice Name	Map ID	Practice Name	Map ID	Practice Name
1	Braids Medical Practice	15	Inchpark Surgery	29	Blackhall Medical Centre	43	St Leonard's Medical Centre	57	Cramond Medical Practice
2	The Green Practice	16	West End Medical Practice	30	Restalrig Park Medical Centre	44	Braefoot Medical Practice	58	South Queensferry Medical Practice
3	Leven Medical Practice	17	Bruntsfield Medical Practice	31	Crewe Medical Centre	45	Sighthill Red Medical Practice	59	Gilmore Medical Practice
4	Southfield Medical Practice	18	Ladywell Medical Centre (East)	32	Southern Medical Group	46	Sighthill Green Medical Practice	60	The Group Practice - Eyre
5	Colinton Surgery	19	Liberton Medical Group	33	University Health Service	47	Riccarton General Practice	61	Mill Lane Surgery
6	Fernichill Surgery	20	Mackenzie Medical Centre	34	Durham Road Medical Group	48	The Pentlands Medical Practice	62	Boroughloch Medical Practice
7	Leith Surgery	21	Dr Thyne & Partners	35	Craiglockhart Medical Group	49	Edinburgh Access Practice	63	Links Medical Centre
8	Niddrie Medical Practice	22	Grange Medical Group	36	Dr A Comiskey and Partners	50	Wester Hailes Medical Practice	64	Ratho Medical Practice
9	Craigmillar Medical Group	23	Milton Surgery	37	Baronscourt Surgery	51	The Victoria Practice	65	Barclay MP East Craigs
10	Ladywell Medical Centre (West)	24	Meadows Medical Practice	38	Muirhouse Medical Group	52	Slateford Medical Practice	66	Hermitage Medical Practice
11	The Long House Surgery	25	Dalkeith Road Medical Practice	39	Davidson's Mains Medical Centre	53	Murrayfield Medical Centre	67	Gracemount Medical Practice
12	Whinpark Medical Practice	26	Annandale Medical Practice	40	Summerside Medical Practice	54	Springwell Medical Group	68	Parkgrove Medical Practice
13	Brunton Place Surgery	27	Murrayfield Medical Practice	41	St Triduana's Medical Practice	55	The Firrhill Medical Centre	69	Kirkliston Health Centre
14	Bangholm Medical Centre	28	The Hopetoun Practice	42	Morningside Medical Practice	56	Leith Mount Surgery		

Figure 01c.1: Map showing GP practices within the Council boundary (note: full scale maps are also provided as core document)

Ref	Practice Name
1	Braids Medical Practice
2	The Green Practice
3	Leven Medical Practice
4	Southfield Medical Practice
5	Colinton Surgery
6	Ferniehill Surgery
7	Leith Surgery
8	Niddrie Medical Practice
9	Craigmillar Medical Group
10	Ladywell Medical Centre (West)
11	The Long House Surgery
12	Whinpark Medical Practice
13	Brunton Place Surgery
14	Bangholm Medical Centre
15	Inchpark Surgery
16	West End Medical Practice
17	Bruntsfield Medical Practice
18	Ladywell Medical Centre (East)
19	Liberton Medical Group
20	Mackenzie Medical Centre
21	Dr. Thyne & Partners
22	Grange Medical Group
23	Milton Surgery
24	Meadows Medical Practice
25	Dalkeith Road Medical Practice
26	Annandale Medical Practice
27	Murrayfield Medical Practice
28	The Hopetoun Practice
29	Blackhall Medical Centre
30	Restalrig Medical Centre
31	Crewe Medical Centre
32	Southern Medical Group
33	University Health Service
34	Durham Road Medical Group
35	Craiglockhart Medical Group
36	Dr A Comiskey and Partners
37	Baronscourt Surgery
38	Muirhouse Medical Group
39	Davidson Mains Medical Centre
40	Summerside Medical Practice
41	St Triduana’s Medical Practice
42	Morningside Medical Practice
43	St Leonard’s Medical Centre
44	Braefoot Medical Practice
45	Sighthill Red Medical Centre
46	Sighthill Green Medical Centre

47	Riccarton General Practice
48	The Pentlands Medical Practice
49	Edinburgh Access Practice
50	Wester Hailes Medical Practice
51	The Victoria Practice
52	Slateford Medical Practice
53	Murrayfield Medical Practice
54	Springwell Medical Practice
55	Firrhill Medical Centre
56	Leith Mount Surgery
57	Cramond Medical Practice
58	South Queensferry Medical Practice
59	Gilmore Medical Practice
60	The Group Practice - Eyre
61	Mill Lane Surgery
62	Boroughloch Medical Practice
63	Links Medical Practice
64	Ratho Medical Practice
65	Barclay Medical Practice East Craigs
66	Hermitage Medical Practice
67	Gracemount Medical Group
68	Parkgrove Medical Practice
69	Kirkliston Health Centre

Figure 01c.2: List of GP practices in Edinburgh

Evidence on existing primary care services in Edinburgh has been prepared with the Edinburgh Health and Social Care Partnership (EHSCP). The evidence outlines the pressures which health and social care services in Edinburgh are currently experiencing and the future anticipated pressures, particularly upon GP services, resulting from increased demand from a growing population. Part of this growing demand is associated with additional housing development that is already being constructed or is committed under the existing City Plan 2030 and the previous Edinburgh Local Development Plan 2016.

Provision of primary health care is complex and challenging, with GP practices varying in size, and with catchment areas that overlap. Most of the practices are run as independent businesses with only some in direct NHS ownership, which requires careful discussion, negotiation and planning to ensure future medical needs are met in the face of changing circumstances. Private practices cannot be forced to take additional patients. The pace of population growth is rapid, making it difficult to bring forward sufficient additional infrastructure in time. The lead in time for providing new infrastructure can be protracted, as it has to go through the NHS governance process and is influenced by national decisions on funding. Once new infrastructure is delivered, it is often already at capacity as soon as it is operational, despite best attempts to avoid that outcome with programming informed by the annual housing land audit.

The EHSCP prepared a Population Growth and Primary Care Premises Assessment for Edinburgh from 2022-2030 in 2022. The purpose of the report was to identify the level of projected population growth as a result of committed development sites identified in the Edinburgh Local Development Plan 2016, windfall housing sites and allocations in City Plan 2030, and to recommend actions to ensure the growing population can access primary care, general medical services. It was based on the 2021 Housing Land Audit, the most up-to-date audit at the time.

The Assessment was prepared for the examination of City Plan 2030 and informed Table 12 Health Care Infrastructure of the adopted Plan. Although the Assessment was prepared three years ago, it still gives a useful baseline of the pressures that the primary care system is currently under and the situation has only become more difficult since the paper was published, in particular due to a freeze on all NHS capital infrastructure spending, and due to other windfall sites coming forward. Any update to this will be considered in the development of the Proposed Plan.

Over the period 2010 to 2022, the population registered with a medical practice in Edinburgh grew by 85,000. The growth rate over that 12 year period is almost the equivalent of the total population of Midlothian having to be absorbed by Edinburgh's practices and helps to demonstrate the scale of population growth being faced by primary care services. When the population increases in a health board area, this triggers increased revenue allocations for healthcare provision. However, no adjustment is made for the increased costs associated with additional capital investment for new infrastructure required for the expanded population. This is the reason why the Council seeks developer contributions, to provide for the additional healthcare infrastructure required as a direct result of new development.

The annual population growth rate is approximately 7,000 per year, equivalent to one new practice annually. Edinburgh's primary care practices have been very flexible in trying to absorb the growing population, but this elasticity is now exhausted in most parts of the city. A symptom of this pressure is the number of medical practices declaring themselves as restricted, i.e. limiting the number of additional patients able to register each week. Over half the practices were in this position in 2022.

The assessment calculated that over the 2016 LDP plan period additional GP capacity would be needed for 46,000 more people and 50,000 more people over the City Plan 2030 plan period. The paper identified the need to deliver four proposals by 2028 to accommodate population increases:

- Maybury (new GP practice)
- Liberton Campus (new GP practice)
- South East Outer (new GP practice)
- Meadowbank (Brunton Medical Practice)

It also identified the need to progress two additional opportunity led priorities:

- Granton Waterfront (new GP Practice)
- Ocean Terminal (new GP Practice)

In Governance	Year	Planned Additional Patient Capacity
Meadowbank/Brunton*	2024	2,000 (rehousing)
Liberton School Dev	2025	10,000 (new practice)
West Edin (Maybury)	2025	10,000 (new practice)
South-East Outer	2026	10,000 (new practice)
In development	(Sub-Total)	(32,000)
Ocean Terminal	2024	10,000 (new practice)
Leith Tram Depot	2028	4,000 (rehousing tbc)
Granton Waterfront	2026	10,000 (new practice)
Milburn Tower (E)	2030 (tbc)	10,000 (new practice)
Morningside/Hermitage*	ASAP	4,000
Meadows/Grange*	ASAP	4,000
Stockbridge*	ASAP	1,000
Bangholm	ASAP	1,000 (tbc)
Total		c.76,000

* Existing practices requiring new premises

Figure 01c.3: Planned Additional Capacity

The above table from the Population Growth and Primary Care Premises Assessment indicates how and where capacity for the new population should be developed. Projects in governance are those that have been to the project board, and projects in development are at an earlier stage and have yet to go to the board. Although Ocean Terminal is in development, it is seen as an urgent priority which could create capacity quickly for the rapidly expanding population in the Leith area.

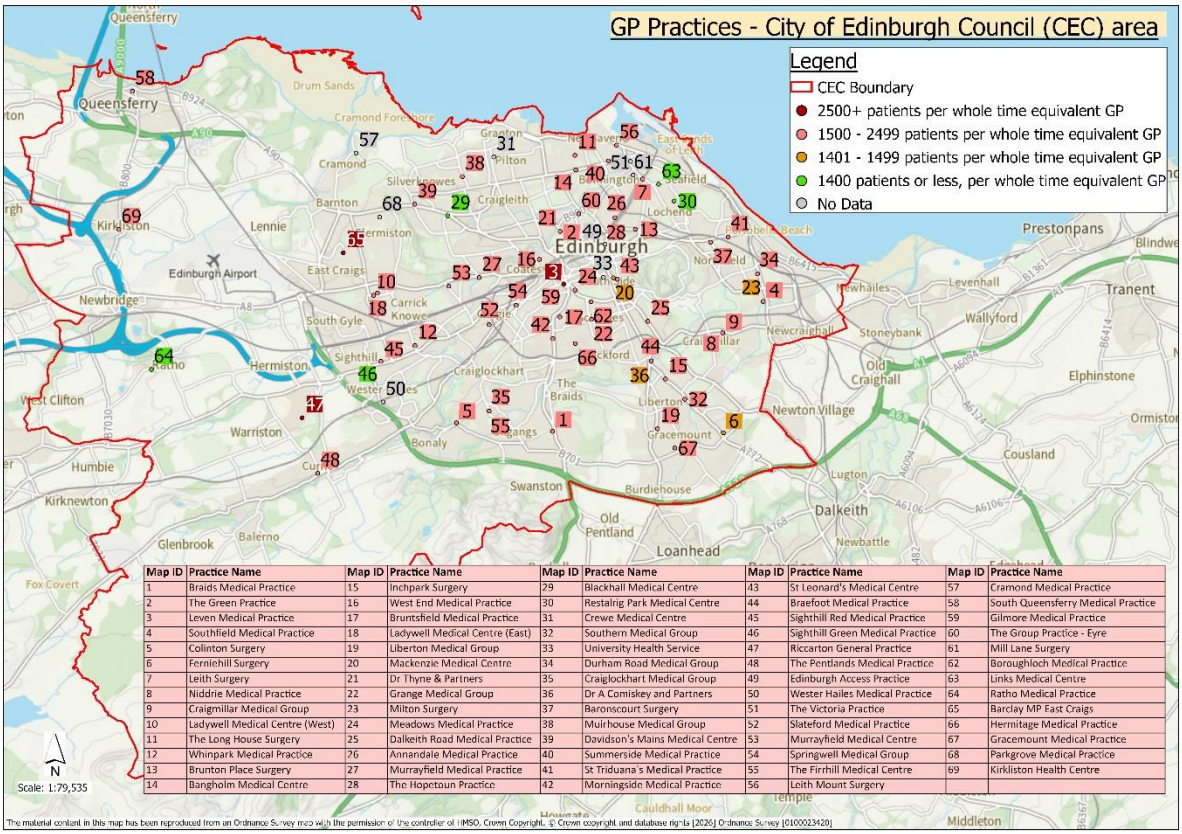
A complicating factor is the student population because the Housing Land Audit does not record purpose-built student accommodation developments. By their nature, these developments are speculative and therefore unlike housing, it is not possible to programme the future impacts. The student population does not generate the same GP workload as the average population, because in general young people tend to be healthier and have a lower risk of health conditions. However, it is important to recognise the administrative workload caused by high turnover and the concentration of this at the start of the academic year. An increase in purpose-built student accommodation (PBSA) locally can create rapid rises in list sizes which are associated with relatively modest clinical demand. It is important that the impacts of this are addressed. The Council currently collects developer contributions from student accommodation developments and will continue to monitor them to ensure

that the impacts of PBSA developments on healthcare infrastructure are mitigated. The Council will need to explore this matter when preparing the Proposed Plan.

Table 12 of the City Plan 2030 sets out the healthcare actions associated with housing allocations identified in the Plan, based on information from Appendix V of the Population Growth and Primary Care Premises Assessment and can take the form of new practices and/or extensions to existing practices depending on the local circumstances. Any housing proposals for windfall housing developments are expected to meet the requirements of City Plan 2030 Policy Inf 3 Infrastructure and Developer Contributions.

The EHSCP has provided an update to show the current GP capacities based on data supplied by the practices. The evidence shows the number of patients per Whole Time Equivalent (WTE) GPs for practices in the city. WTE is based on GPs working 9 sessions of four hours and ten minutes each week. The results have been mapped using a RAG system (see Figure 01c.4 below). The map defines the practices as follows:

- Green: sufficient capacity (less than 1,400 patients per GP)
- Amber: near capacity (1,400 – 1499 patients per GP)
- Red: Over capacity (more than 1500 - 2499 patients per GP)
- Dark Red: severely over capacity (+2500 patients per GP)



Map ID	Practice Name	Map ID	Practice Name	Map ID	Practice Name	Map ID	Practice Name	Map ID	Practice Name
1	Braids Medical Practice	15	Inchpark Surgery	29	Blackhall Medical Centre	43	St Leonard's Medical Centre	57	Cramond Medical Practice
2	The Green Practice	16	West End Medical Practice	30	Restalrig Park Medical Centre	44	Braefoot Medical Practice	58	South Queensferry Medical Practice
3	Leven Medical Practice	17	Bruntsfield Medical Practice	31	Crewe Medical Centre	45	Sighthill Red Medical Practice	59	Gilmore Medical Practice
4	Southfield Medical Practice	18	Ladywell Medical Centre (East)	32	Southern Medical Group	46	Sighthill Green Medical Practice	60	The Group Practice - Eyre
5	Colinton Surgery	19	Liberton Medical Group	33	University Health Service	47	Riccarton General Practice	61	Mill Lane Surgery
6	Fernichill Surgery	20	Mackenzie Medical Centre	34	Durham Road Medical Group	48	The Pentlands Medical Practice	62	Boroughloch Medical Practice
7	Leith Surgery	21	Dr Thyne & Partners	35	Craiglockhart Medical Group	49	Edinburgh Access Practice	63	Links Medical Centre
8	Niddrie Medical Practice	22	Grange Medical Group	36	Dr A Comiskey and Partners	50	Wester Hailes Medical Practice	64	Ratho Medical Practice
9	Craigmillar Medical Group	23	Milton Surgery	37	Baronscourt Surgery	51	The Victoria Practice	65	Barclay MP East Craigs
10	Ladywell Medical Centre (West)	24	Meadows Medical Practice	38	Muirhouse Medical Group	52	Slateford Medical Practice	66	Hermitage Medical Practice
11	The Long House Surgery	25	Dalkeith Road Medical Practice	39	Davidson's Mains Medical Centre	53	Murrayfield Medical Centre	67	Gracemount Medical Practice
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Figure 01c.4: GP capacity in Edinburgh (full sized version provided as a core document)

The latest data on GP practices shows that a high proportion of GPs are over capacity, with more than 1,500 patients per WTE, with three practices severely over capacity. Only a small number of practices have some capacity and four are approaching capacity. It should be noted that the data represents a snapshot in time. Practices continue to be under constant pressure due to the growing population. Not all practices responded to the request to supply latest capacity data and as private businesses they are not obliged to provide it, but despite this, the overall picture shows that there are severe constraints in GP capacity. The Council does not consider the missing data would change this conclusion. The Council will continue to work with the EHSCP to close this minor data gap during the development of the Proposed Plan and as part of its ongoing commitment to working with the partnership. The EHSCP has also committed to compiling data on a condition survey of all the existing practices, in discussion and consultation with the individual practices.

This a large-scale project and the data will not be available before the submission of the Evidence Report and as a result is identified as an evidence gap. The evidence will be prepared in accordance with development plan scheme timescales, and the EHSCP has committed to completing the task by the end of 2026 so that the results can inform the preparation of the Proposed Plan.

Healthcare infrastructure that is in poor condition or in need of replacement is a relevant issue in terms of the future planning of the delivery of healthcare infrastructure. This a matter that will involve discussion between NHS Lothian, the individual private practices, the EHSCP, and the Council. It is not considered a matter that can be addressed or resolved through the collection of developer contributions or through the provision of new infrastructure directly by developers in the context of new development as it does not meet the policy tests of the Circular 3/2012, i.e. fair and reasonably relate in scale and kind to the proposed development. However, in the consideration, identification and delivery of new infrastructure, it is a matter that will require to be addressed in order to ensure the right design of new facilities in the right locations factoring in existing and future healthcare needs. Developers will only make a proportionate contribution to new infrastructure related to the additional capacity associated with new development.

Implications of Population Growth and Future Health Care Infrastructure Needs

City Plan 2040 will be required to provide additional housing sites to meet the housing requirement. Depending on where the additional houses are located, there will be significant additional pressure on the health care infrastructure and this will exacerbate existing capacity constraints. Further impacts on existing healthcare practices will require additional infrastructure provision, as the level of spare infrastructure capacity is extremely limited.

The Council will continue to work closely with NHS Lothian and the EHSCP to quantify the amount of new population generated by development and to identify what infrastructure is required as part of the process of preparing the Proposed Plan. It will also explore if new healthcare infrastructure can be co-located with other new infrastructure, for example education provision, in order to ensure most efficient provision and delivery of infrastructure. The Council will also continue to collect and distribute developer contributions for new infrastructure in order to enable new health care facilities to be delivered in line with the infrastructure first approach set out in NPF4 Policy 18.

With regard to other primary care services, NHS Lothian has provided some up-to-date information. Data on pharmacies supplied by NHS Lothian shows there are 132 pharmacies in Edinburgh. There is no capacity or condition information available on these facilities as these are independent businesses and such information is confidential. However, the NHS Lothian pharmaceutical service plan for the next three years outlines that there is good provision in the area at present. Nevertheless, as the population grows this may well change. It will be for NHS Lothian to monitor the situation and approve additional licences for new pharmacy requests in line with its approved procedures if existing facilities are insufficient. Pharmacies have been mapped as part of the Place Profiles work in the context of local living.

Data supplied by NHS Lothian also shows that there are 108 dentists providing NHS treatment across Edinburgh. A list of the facilities is included as a core document. Again, there is no capacity or condition information available on these facilities as these are independent businesses. Edinburgh was not identified as a priority for Scottish Government dental access funding suggesting there is a sufficient supply, although this may change as the population of Edinburgh grows. However, there are more dentists in the Edinburgh area than the rest of the Lothians, reflecting the higher population density.

In terms of optometrists, there are 61 businesses across Edinburgh providing NHS eye tests and this is considered to be a sufficient supply by NHS Lothian. However, there is no capacity or condition information available on these facilities as these are independent businesses and not publicly available. A list of the businesses has been included as a core document.

With regard to all the services provided by pharmacies, dentists and optometrists only a proportion of Edinburgh’s population requires access to such services at any time and the existing supply is considered adequate and accessible in terms of existing needs. It is not possible to calculate future needs as there is no agreed methodology. The Council will not seek developer contributions towards these services as it does not consider it would meet the tests of Circular 4/2025 Planning

Obligations and Good Neighbour Agreements as for example, they are not necessary in order to make the development acceptable in planning terms or relate to the proposed development as a direct consequence of the development.

Public Conveniences and Water Refill Locations

The Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019, requires local development plans to include a statement of the planning authority's policies and proposals to the provision of public conveniences and water refill locations. The Council carried out a review of public conveniences in 2023. The review looked at public convenience availability in Edinburgh's town centres and at Queensferry, which is a local centre that attracts a number of visitors. Five of the town centres had public toilets, many in need of improvement, and three of the town centres had none, although there were some alternative facilities potentially available to members of the public, for example at local libraries, supermarkets or nearby but outwith the town centre.

The study confirms that there are still many public conveniences available, albeit in need of improvement but there are also a number of other facilities available within Council buildings or publicly accessible buildings that could potentially provide additional services, which are being explored. From the findings of the place engagement with the public at large and children and young people, the need for more public toilets was frequently mentioned particularly in parks so people could stay out longer.

Work is ongoing to improve community access and inclusion across the Council area and this will be taken into account when meeting the statutory requirements set out in the Act. This commitment to improve access is demonstrated by the Council's new public toilet facilities constructed in the Meadows, Leith Links and Inverleith Park in the spring of 2025.

With regard to water refill points, Scottish Water have provided ten 'Top Up Tap' facilities across the city which members of the public can use for free. Details of the location of these facilities are identified on the Scottish Water Top Up Tap map. The majority of the facilities are concentrated in the city centre with just three in peripheral locations, leaving much of the city without coverage in terms of living locally objectives. The Council will work with Scottish Water to improve community access and inclusion across the Council area and this will be taken into account when meeting the statutory requirements set out in the Act.

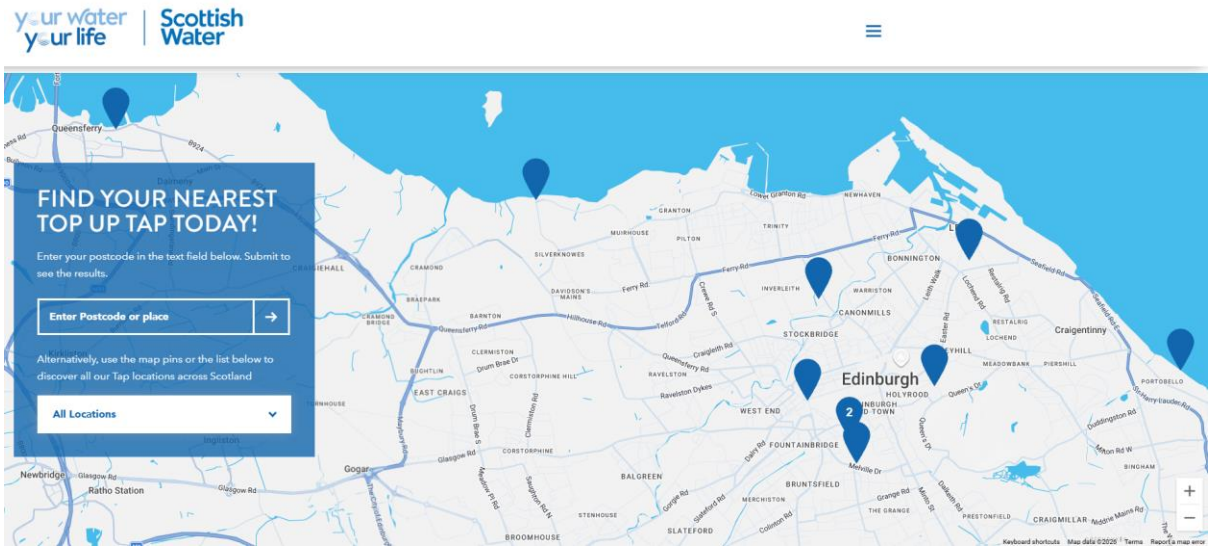


Figure 01c.4: Top Up Tap web page (source: Scottish Water webmap)

Summary of stakeholder engagement

Key Agency	NHS Lothian
Main views raised	• **Scoping Stage (May 2025)** Edinburgh Health and Social Care Partnership responded to the engagement on topic paper scoping by questioning why public toilets are sitting under Infrastructure and Health, as it will be an exhaustive healthcare requirement. • **Draft Topic Papers (Nov 2025):** Suggested that the principal aims of the Lothian Strategic Development Framework should be reflected in the core aims of the Local Development Plan. Recommend the Council works closely with NHS Lothian and the Edinburgh Integrated Joint Board to ensure that health inequalities is a key tenet of planning health and social care. Recommend the Council uses the NHS Lothian policy paper *A Strengthened approach to prevention across the Lothian Health and care system* as a guide to embed a preventative approach to developing the Local Development Plan.

	• **Finalised Topic Papers (Feb 2026):** NHS Lothian confirmed they are content with the evidence presented and changes made addressing their previous comments.
Council response and Implications for the proposed plan	The Council has included public toilet provision within the Infrastructure topic. There is no expectation that healthcare sector will be required to provide public toilet provision. The Council will take into account the Lothian Strategic Development Framework aims, and the policy paper when preparing the Proposed Plan.
Is the agency content with the evidence?	NHS Lothian have advised: "With regards the Evidence Report, NHS Lothian Population Public Health Team are pleased to see the extent to which our comments and suggestions have been considered and incorporated. We are in general agreement that there is sufficient evidence provided across the topic papers to effectively support the development of the Local Development Plan."
Areas of agreement	Agree that evidence is sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council has worked with both NHS Lothian and the Edinburgh Health and Social Care Partnership when preparing the Evidence Report and will continue to do so during the preparation of the Proposed Plan and its subsequent implementation.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** List of GP practices should be reviewed to ensure none are overlooked i.e. South Queensferry and Kirkliston. Object to proposed methodology for RAG rating which only highlights adequacy of staffing which is not an infrastructure consideration. Suggest methodology should identify the number of GPs a premises has capacity for, and compare this capacity to patients registered.

	A study of space per GP required should be undertaken. Important to recognise that some of the lack of capacity will be due to lack of practitioners, the NHS survey data on GP workforce should be included. This shows that staffing levels have increased following two years of decline to 2013 levels. Commitment by EHSCP to update their assessment is welcomed and should include the number of consulting rooms per full time equivalent practitioner and whether building is owned by NHS. This will highlight whether there is a space constraint, and whether expanding a practice will potential entail negotiating with a third party owner. The EHSCP assessment was prepared for the City Plan 2030 examination. It should be acknowledged that all existing allocated sites will be reviewed and may not be reallocated. A further review by the EHSCP is likely to be required following publication of the Proposed Plan, revised strategy and based on latest HLA. The previous assessment was based on 2021 HLA and actual completions have fallen. Revised assessment should be based on the 2022 population and household projections. Information on dentists does not include settlements to the West of Edinburgh, and list should be reviewed to include them.
Council response and Implications for the proposed plan	The Council has added all practices to the topic paper. The Council considers the proposed methodology for showing the capacity of GPs based on number of patients per whole time equivalent (WTE) using a RAG rating, is a well-established approach having been used by numerous councils that have passed the gate check. It is important to recognise that GPs are private businesses, and that access to confidential data is limited. As a result, whilst the EHSCP has committed to a RAG survey of the capacity of practices, a detailed survey of individual practices floorspace is not considered feasible. Furthermore, the number of employed GPs is a key determinant of how much space a practice requires rather than the other way around and a practice will make full use of what space it has available. A practice is unlikely to create more space than they need for the

	existing or proposed staff levels. In addition, individual practices may provide for a comprehensive range of health care service needs other than GPs making a comparative floorspace assessment very complex. The staffing data provided by HFS relates to March 2025. The data provided by the EHSCP is more up to date. The Council agrees that the revised assessment prepared by the EHSCP should be based on the latest agreed Housing Land Audit and available population data. The Council has added information on dentists to the topic paper.
Is the agency content with the evidence?	HFS object to the proposed methodology for the assessment of GP capacity and suggest an alternative.
Areas of agreement	Welcome commitment by the EHSCP to update their assessment.
Outstanding issues	The Council does not agree that the alternative methodology is reasonable or can be implemented.
Actions for proposed plan stage	The Council will continue to work with NHS Lothian and the EHSCP during the preparation of the Proposed Plan and its subsequent implementation to understand the healthcare infrastructure requirements to deliver the Plan's strategy.

Summary of implications for the Proposed Plan

- The evidence shows that the existing GP practices are under significant pressure. The Proposed Plan needs to recognise that the scope for existing practices to accommodate further patients, as a result of future development over and above existing pressures, is extremely limited.

- The latest evidence supplied by the EHSCP shows there are no areas with notable spare healthcare infrastructure capacity where housing development could be targeted/focused. As a result, the Proposed Plan will need to address how potential new development can fully mitigate development impact on healthcare infrastructure.

- Purpose built student accommodation developments also have an impact on medical practices. The Council currently collects developer contributions from these developments. The Proposed Plan will continue to consider how to address their impact.

- The Council will work with the EHSCP and NHS Lothian to identify the necessary health care infrastructure required to be delivered alongside new housing development in the Proposed Plan and any additional infrastructure needed in accordance with the infrastructure first approach.

- The Council will explore how new community facilities including healthcare can be co-located to ensure more efficiently delivery of new infrastructure.

- The Council will consider the need to improve community access to public conveniences and will explore the feasibility of delivering them as part of new developments to improve accessibility.

- The Council will explore the feasibility of delivering top up water facilities as part of new developments in discussion with Scottish Water and its future plans to extend the network of facilities.

- The Council, which already has a strong working relationship with health organisations, will continue to work with EHSCP and NHS Lothian to identify the necessary healthcare infrastructure required, including information on the condition of existing health care infrastructure and its implications for the delivery of new infrastructure. The organisations have committed to providing further information on existing healthcare infrastructure by the end of the year, in order to support the preparation and subsequent delivery of the Proposed Plan.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage

01d: Infrastructure - energy and digital infrastructure

Topic	**01d: Infrastructure - energy and digital infrastructure**
Description of topic	Review of Edinburgh's electricity grid network and digital access
Information required by the Act	Section 15(5) • the infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education facilities); • • how that infrastructure is used;
Relevant NPF4 Policies	• Policy 18 Infrastructure first • Policy 24 Digital infrastructure National development no.3 Strategic Renewable Electricity Generation and Transmission Infrastructure Transmission Infrastructure National development no.12 Digital Fibre Network
Linked topic papers	• Policy 01e Infrastructure - water and waste water • Policy 02 Natural places • Policy 03 Green belt, countryside and rural • Policy 07 Zero wate, energy, heating and cooling • Topic 08 and 09 Climate change and climate mitigation • Topic 12 Housing land
Local Development Plan Guidance	Information on infrastructure capacity, condition, needs and deliverability, within the plan area and cross-boundary. This may relate to existing and planned infrastructure. The Evidence Report should identify areas with gaps in connectivity and barriers to digital access. Stakeholders expected to inform the preparation of the Evidence Report are energy network companies – reflecting anticipated increased demands on the electricity network driven by progress towards net zero targets, including an increase in EV chargers. Regarding digital infrastructure, the Evidence Report can be informed by the views of wider local and planning authority departments, such as economic development, as well as the Mobile Network Operators (MNOs) and Wireless Infrastructure Providers (WIPs) in relation to programmed investment in digital infrastructure within the area.

	An infrastructure first approach should underpin all aspects of plan making, with infrastructure considerations at the heart of place making. This means undertaking early engagement, evidence gathering and where possible data sharing, including with public and private infrastructure providers. This approach also offers potential benefits for infrastructure providers with regard to informing their own plans and strategies.
List of and links to evidence	• **CD083** 2030 Climate Strategy, City of Edinburgh Council, December 2021 • **CD116** A National Mission with Local Impact: Infrastructure Investment Plan for Scotland – 2021-22 to 2025-26, City of Edinburgh Council, February 2021 • **CD118** About Reaching 100%, Scottish Government, 2016 • **CD550** Beyond 2030 interactive map, National Energy System Operator (NESO), 2026 • **CD549** Beyond 2030. A national blueprint for a decarbonised electricity system in Great Britain, National Energy Systems Operator (NESO), 2024 • **CD653** Building a shared net-zero future: SGN Environment Strategy, SGN, March 2021 • **CD261** City of Edinburgh Council Planning Portal, City of Edinburgh Council, 2026 • **CD585** Connected Nations Report 2022: Interactive Report, Ofcom, Published December 2022 (updated February 2024) • **CD129** Consultation on Scotland's next Infrastructure Strategy 2027-2037, Scottish Government, January 2026 • **CD283** Development management sub-committee webpage for committee held on 4th February 2026, City of Edinburgh Council, February 2026 • **CD135** Draft Energy Strategy and Just Transition Plan, Scottish Government, January 2023 • **CD086** Edinburgh 2050 City Vision, City of Edinburgh Council, 2023 • **CD089** Edinburgh Local Heat and Energy Efficiency Strategy (LHEES), City of Edinburgh Council, December 2023 • **CD145** Green datacentres and digital connectivity: vision and action plan for Scotland" (2021), Scottish Government, March 2021 • **CD148** Heat in Buildings Strategy - achieving net zero emissions in Scotland's buildings, Scottish Government, October 2021 • **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023 • **CD077** Network Development Plan, SPEN, May 2024

- **CD171** New Build Heat standard, Scottish Government, January 2025
- **CD686** Project Gigabit, UK Government, April 2022 (updated November 2025)
- **CD201** Scottish 4G Infill Programme (S4GI), Scottish Government, January 2026
- **CD698** South of Scotland EV Charging Strategy, Urban Foresight, 2025
- **CD663** SPEN's distributed generation heat map, SPEN, 2026
- **CD662** SPEN's transmission heat map, SPEN, 2026
- **CD551** Strategic Spatial Energy Planning (SSEP) webpage, Network Systems Energy Operator (NESO), 2026
- **CD707** UK Broadband Coverage & Speedtest Result Maps, Local Broadband Information by thinkbroadband, 2026
- **CD399** Wester Hermiston Data AI Data centre campus, Apatura, 2026

List of matters covered

This topic paper considers the following in relation to:

- Energy infrastructure including electricity and gas grids
- Digital infrastructure including mobile and broadband

Summary of evidence

National context

Energy

Scotland's Energy Strategy and Just Transition Plan (Draft) sets out a range of ambitions for Scotland across various sectors. A common theme to these is to decarbonise Scotland in a way that benefits all in society and the country's economy. Generating more electricity from renewable sources and increasing storage capacity for this area are key priorities, as is renewable hydrogen. In addition, decarbonising existing sectors such as transport and industry is an important focus. The Heat in Buildings Strategy provides further information on the decarbonisation pathway for buildings to support these aims.

Beyond 2030: A national blueprint for a decarbonised electricity system in Great Britain is a report by the National Grid Electricity System Operator Limited (NGESO). It recommends around £58 billion investment for offshore and onshore network upgrades across Great Britain. This is to help to connect an additional 21GW of offshore wind power, along with various other low carbon energy sources.

The UK Strategic Spatial Energy Plan (SSEP) has not yet been produced but is intended as 'the first overall plan for Great Britain's energy production and storage from 2030 to 2050.' It is scheduled for production in 2027 and if it is produced prior to preparation of the Proposed Plan then any relevant elements will be taken into account.

The Centralised Strategic Network Plan (CSNP) and Regional Energy Strategic Plans (RESPs) should be produced by the end of 2028, although this is dependent on the Secretary of State's decision on the SSEP pathway being made in summer 2026. Although unlikely due to timescales, if it is produced in advance of the preparation of the Proposed Plan then any relevant implications shall be taken into account.

Theme 1 of Scotland's Infrastructure Investment Plan – 2021-22 to 2025-26 is 'enabling the Transition to Net Zero Emissions and Environmental Sustainability'. The strategy notes that 'this will require transformative action across all sectors of the economy and across society'.

NPF4 identifies 'Strategic Renewable Electricity Generation and Transmission Infrastructure' as a national development which 'supports electricity generation and associated grid infrastructure throughout Scotland, providing employment and opportunities for community benefit, helping to reduce emissions and improve security of supply.'

SP Energy Networks (SPEN) is the electricity operator covering the central and southern Scotland area, including Edinburgh. SPEN has produced a Network development plan. This explains that 'electricity networks are at the heart of the Net Zero transition. The scale of decarbonisation means that by 2050 the peak demand on our distribution network is forecast to double, and we could likely see a five-fold increase in connected generation and storage.'

Scotland Gas Network (SGN) is the gas operator for Scotland. It has produced an Environment Strategy titled 'Building a shared net-zero future' in which SGN commits to accelerating to a net zero future by 2045. The main components to this Strategy are to reduce overall levels of gas consumption and to use alternatives to natural gas such as hydrogen and biomethane that avoid the same level of adverse impact on global warming when burned.

Digital

Scotland's Infrastructure Investment Plan – 2021-22 to 2025-26 notes that over 97.8 % of premises are now able to access fibre broadband, with annexe A of the Investment plan recommending an indigenous data centre market and a full fibre network for Scotland by 2027 to enable a transition to 5G for the whole country. A consultation on Scotland's next Infrastructure Strategy 2027-2037 has recently taken place. Although this does not have specific actions in relation to broadband, it does recognise the role of broadband expansion is key to widening access to employment and education. Programmes such as Scottish Government's R100 have already provided funding to assist in the delivery of this to improve access to faster connections to many properties across Scotland. Project Gigabit sets out the UK

government's commitment to aim for 99% properties have access to a gigabit-capable connection by 2032.

For mobile data, Scottish Government's Scottish 4G Infill Programme (S4GI) and Shared Rural Network have improved the extent of coverage and has focused on areas lacking coverage which relates more to rural and island areas so that over 89% of Scotland has coverage provided by at least one mobile network operator.

In 2021 Scottish Government published 'Green datacentres and digital connectivity: vision and action plan for Scotland' (2021). This sets out the importance of data centres for Scotland's economy but also recognises the importance of supporting opportunities for waste heat from data centres for heat and other energy use. It states there will be a need for a range of sizes of data centres, including hyperscale facilities, across Scotland. It also states, however, there will be a need to identify the optimal locations for these.

Local context

The Edinburgh 2050 City Vision sets out sustainability as one of the 12 key themes for Edinburgh. Edinburgh's 2030 Climate Strategy addresses this further and recognises Climate Change is the biggest threat facing our planet and is why the Council has declared a climate emergency.

The Edinburgh Local Heat and Energy Efficiency Strategy (LHEES) has further information on decarbonisation and strategies for retrofit and considering different local areas' energy planning, including in spatial mapping form involving Ordnance Survey (OS) data. The LHEES has received input from key stakeholders, including utility companies such as Scottish Water on heat extraction opportunities from its network.

Electricity grid

There are some significant changes which are expected to increase the amount of electricity required to be supplied by the grid as part of the overall transition to net zero. Some of these changes are already beginning to take place.

Firstly, the increase in electric and hybrid vehicles as well as electric vehicle (EV) charging points is expected to increase electricity demand. The South of Scotland EV Charging Strategy sets out future demand for EVs by local authority area.

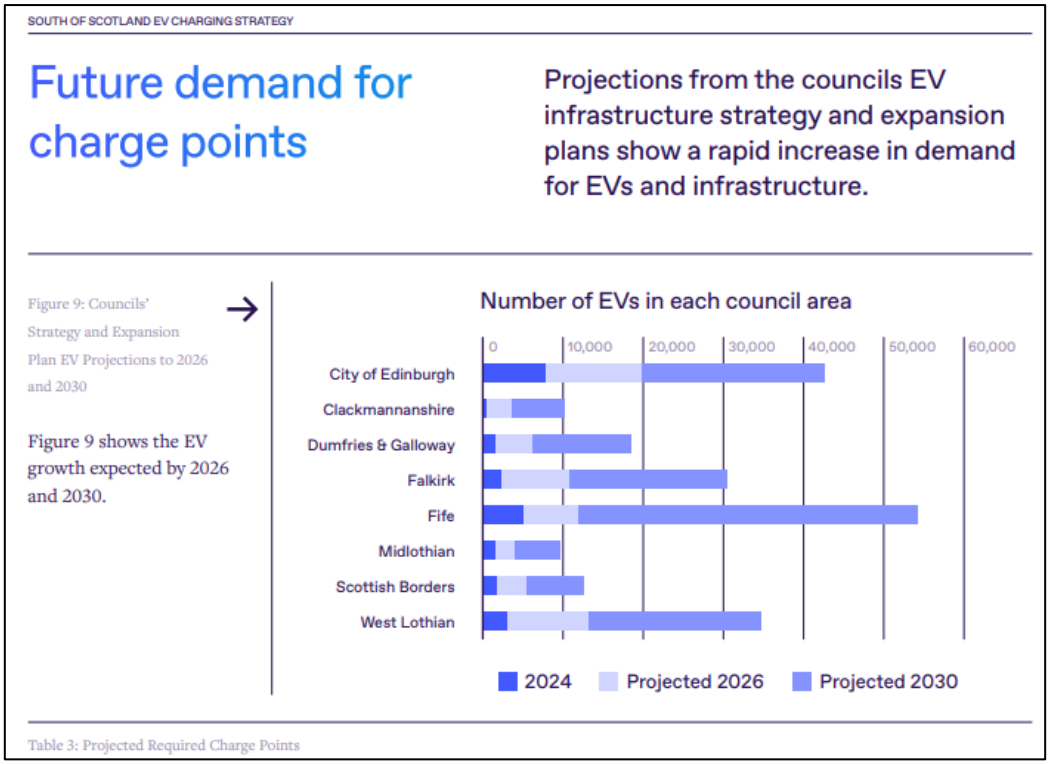


Figure 01d.1: EVs by Council area including projections (source: EV Charging Strategy)

Figure 01d.1 shows there is expected to be a significant increase in EVs required in Edinburgh. The Strategy also identifies the local objective for the Council to provide a 'well-designed, comprehensive and people focused public charge point network, ensuring a good geographical spread of charge points across the city'. The levels of increase shown in figure 1d-1 will amount to a significant level of electricity needing to be supplied by the grid.

In line with the New Build Heat Strategy 2025; new buildings must now employ zero direct emissions (ZDE) heating systems. In some cases, these developments may be able to generate sufficient electricity through solutions like solar PV panels to power heat pumps. In other cases, however, there is likely to be a greater level of electricity demand from the grid to power ZDE heating solutions. This is particularly likely for higher density development proposals where there may be limited roofspace for PV panels relative to the floorspace and volume of space to be heated. This may pose a challenge for Edinburgh.

Over time, some of these areas may transition to be part of larger district heat networks (discussed further in Topic Paper 07 Zero waste, energy, heating and cooling) but this may not present a complete and immediate solution for these developments. Consequently, it is prudent to consider the potential for higher levels of draw on the electricity grid, especially in more dense areas.

SPEN's Transmission Heat Map and SPEN's Distributed Generation Heat Map shows key elements of the electricity generation, distribution and transmission network. This includes the routes and voltages of key overhead lines, grid supply

points (GSP) and key sources of distribution generation, including Battery Energy Storage Systems (BESS). The implications of this for new energy generation are addressed further in Topic Paper 07 Zero waste, energy, heating and cooling.

In terms of the electricity grid, SPEN's connections heat map shows several key elements of electricity grid infrastructure and their current capacity: grid supply points, primary substations, high voltage (HV) lines and extra high voltage (EHV) lines.

The EHV around the periphery of Edinburgh have relatively more capacity than towards the centre of the city; with the same applying to the grid supply points (GSPs). The GSPs are where the electricity from the EHV lines in the transmission network is supplied to the HV lines of the local distribution network. The same picture applies to the primary substations and HV lines.

National Grid ESO's interactive map provides an overview of large-scale transmission reinforcement planned over the next 10 - 15 years. This map is illustrative and does not represent specific cable routes. For the Edinburgh area, it shows a reconfiguration of existing 275 kV circuits between Kincardine and Currie and Currie and Cockenzie via Smeaton and Kaimes, reprofiling one side of the existing overhead line double circuit to 400 kV operation.

The capacity of the electricity grid will be a consideration in the Proposed Plan.

Gas grid

As noted above, in line with the new Heat in Building standard, new developments must now employ zero direct emissions (ZDE) heating systems. This means the gas grid is not expected to be an infrastructure constraint for new development however many of Edinburgh's existing properties are still connected to the gas grid.

Table 24 (page 91) within Edinburgh's LHEES shows that 90.7% of homes in Edinburgh are known to be connected to the gas grid. SGN's non-gas webmap and Edinburgh's LHEES Figures 16-23 (pages 151 to 158) shows there are only a small proportion of homes off the gas grid. As a result, transitioning dwellinghouses away from gas in Edinburgh will be significant part of the challenge in achieving net zero. By comparison, a far lower proportion of non-domestic properties are connected to gas at 33.6%. Even this lower percentage still adds further to the significant challenge of transitioning the existing building stock of Edinburgh away from mains gas as required to meet the targets for net zero committed to by the Council and Scottish Government.

Digital infrastructure

Mapping from UK Broadband Performance and Coverage Statistics (thinkbroadband.com), as of January 2026 shows address level data (where known) in terms of 'fibre to the property' (FTTP) as well as constituency level data showing percentage level access.

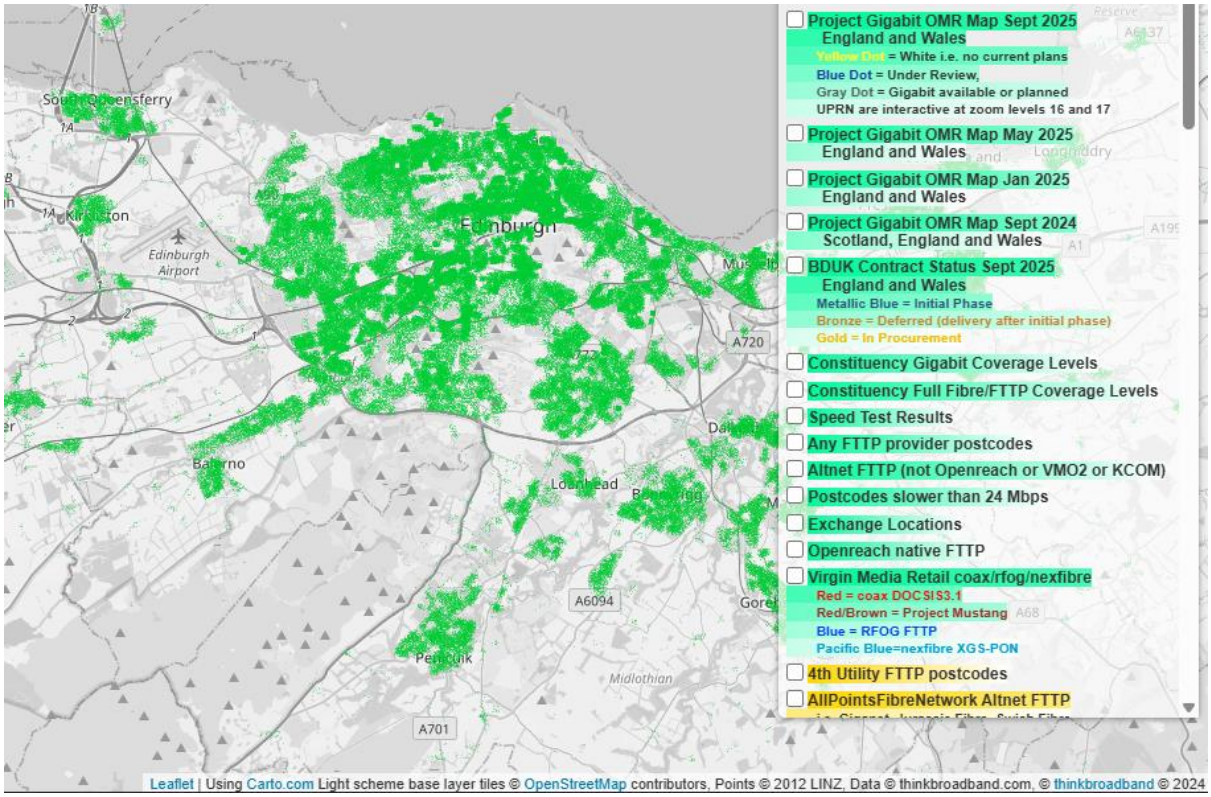


Figure 01d.2: Distribution of 'fibre to the property' (FTTP) Edinburgh area (source: Mapping from UK Broadband Performance and Coverage Statistics 2026)

Overall, figure 01d.2 shows Edinburgh to have a good distribution of FTTP. This also includes its more rural areas as seen in Figure 01d.3.

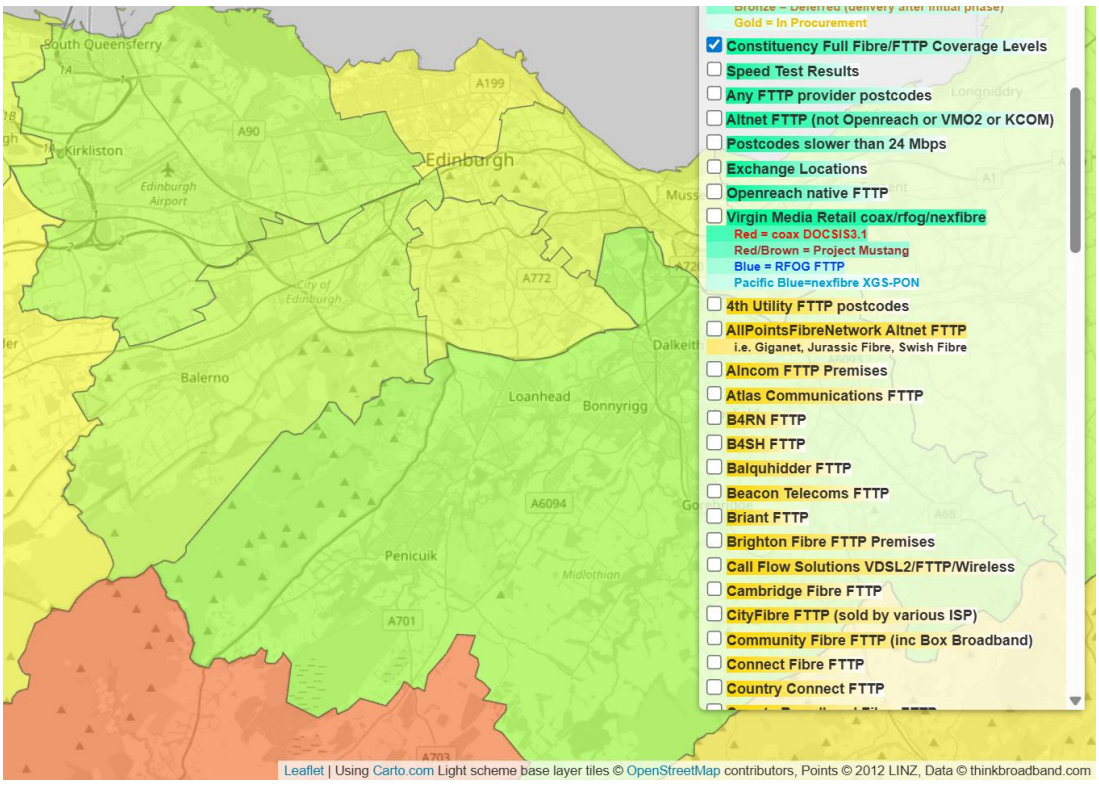


Figure 01d.3: Percentage of properties with FTTP by each constituency (source: Mapping from UK Broadband Performance and Coverage Statistics 2026)

Figure 01d.3 illustrates that the less urbanised parts of the Council area have relatively better access to FTTP or Gigabit than some parts of Edinburgh's urban areas, particularly north of the city with levels at 81.6% compared to 96.1% and 97.5% for the west and south-west of Edinburgh respectively.

Interactive data and mapping from Ofcom 'Connected Nations Report 2022 shows the City of Edinburgh Council area has excellent mobile coverage in terms of 4G, data and voice. Coverage for voice and data is 100% across the Council area. 92% of the Council area has coverage by 4G providers and all of the Council area is served by at least one provider. Data on 5G coverage needs further inputs to be robust and updates on this will be used to inform the new plan.

Edinburgh has several small-scale data centres. Many of these are re-purposed existing buildings, although there is a purpose-built centre located in Newbridge industrial estate of modest size with a footprint of around 1000sqm. There are two significantly larger centres proposed to the west of the city, although both are at an early stage of the planning process. These two proposals are as follows:

- A 200MW data centre and associated works at a 22ha site at Wester Hermiston located Land 300 Metres North Of 50 Research Avenue, North Riccarton, Currie. A proposal of application notice (PAN) has been submitted for the proposal 25/03978/PAN. As PANs do not require detailed information on the proposals to be submitted, reference is made to a webpage created by the applicant to provide further information for those interested.

- An application for planning permission in principle (PPP) submitted for a data centre at 1 Redheughs Avenue at South Gyle/Edinburgh Park was refused on 4th February 2026 (25/04239/PPP). The site area is 5.74ha. The webcast of the Development Management Sub-Committee's consideration and determination of the application can be found on the committee webpage

More information on the PAN submission and PPP proposal can be found on the Council's Planning Portal.

Currently, neither NPF4 nor City Plan 2030 identify specific locations for data centres. The increasing scale of data centres coming forward raise a number of planning issues, particularly given the finite land available in the Council area. This requires careful and holistic consideration of a range of evidence, including in relation to landscape and green belt and countryside objectives as set out in Topic Papers 02 Natural places and 03 Green belt, countryside and rural. In addition, the characteristics of data centres in terms of use, activity and employment mean it is important to consider the information and evidence set out in Topic Paper 18 on Economy, business and industry.

Large data centres also have a significant impact in terms of demands on electricity and water and the practicality of connecting to these networks. In early engagement, Scottish Water has noted the challenges these data centres face, particularly in terms of potable water and possible alternatives. Information on the electricity grid is addressed above in this topic paper, with information on the Scottish Water network set out in the Topic Paper 1e Infrastructure - water and waste water. The issue of using of waste heat for green data centres is addressed in Topic Paper Zero waste, energy, heating and cooling.

Summary of stakeholder engagement

Key Agency	**Scottish Water**
Main views raised	• **Draft Topic Papers (Nov 2025):** Scottish Water has provided a consultation response noting potential issues in the levels of water that may be required to provide cooling to data centres. In meetings, it has also been made clear the uncertainty on the volumes of water required is also an issue. Scottish Water made clear it would like to be involved at an early stage in the preparation of the Proposed Plan.
Council response and implications for the proposed plan	Additional content relating to data centres has been added noting the issues that data centres raise, including on water resources. The title of this paper has been amended to explicitly refer to digital infrastructure in recognition of the incorporation of digital infrastructure such as data centres alongside energy infrastructure.
Is the agency content with the evidence?	Scottish Water does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Scottish Water shall be engaged at an early stage in the preparation of the plan, including on any development proposals being considered for inclusion. This would include data centres if these were being considered.

Key Stakeholder	Homes for Scotland
Main views raised	• **Final Topic Papers (March 2026):** Three information sources are suggested for this paper: legislation, climate change committee and National Grid Electricity System Operator Limited (NGESO). HfS, the Council and energy providers are urged to work with housing developers to identify opportunities for grid re-enforcement and upgrades associated with new home building. Section 3F in the Town and Country Planning (Scotland) Act 1997 is now repealed and means there is no requirement to include policies within development plans under Section 3F. The legislation relating to this is suggested as an evidence source.
Council response and implications for the proposed plan	NESO's 'beyond 2030' publication is included in this updated topic paper. The other two evidence sources more directly relate to Topic paper 8 and 9: Climate change and climate mitigation and so are addressed there. SPEN and developers shall be engaged on the Proposed Plan, including to identify enforcement and upgrades associated with new home building. Comments about the contribution of new homes to a just transition are dealt with in the Topic paper 8 and 9: Climate change and climate mitigation. The comments about Section 3F into the Town and Country Planning (Scotland) Act 1997 now being repealed and the suggestion that the legislation relating to this as an evidence source are not sources of evidence themselves, nor do they have relevance to any evidence considered at this Evidence Report stage.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	SPEN and developers shall be engaged on the proposed plan, including to identify reinforcement and upgrades associated with new home building.

Other engagement and matters raised

Draft Topic Papers (Nov 2025):

SGN provided a response clarifying the role of biomethane alongside hydrogen.

Information has been provided from SPEN and SGN regarding their existing networks, capacity and upgrading plans.

Meetings have taken place with SPEN and SGN. This helped explain key elements of the information in question and also for the Council to explain its plans for the LDP preparation process and how this would involve SPEN.

Implications for Proposed Plan

Electricity grid

Evidence shows that there is capacity in many parts of the Council area, but areas of constraint in some locations. The Council shall consult with SPEN during the preparation of the Proposed Plan, including potential sites considered for allocation to ensure the electricity grid is capable of accommodating these or is capable of being upgraded.

Other uses which may generate or require significant levels of electricity, such as data centres, may be especially significant in terms of implications for the grid.

The Council shall consider any proposals emerging from SPEN for potential inclusion in the Proposed Plan.

Gas grid

The gas grid is not expected to be a significant constraint for the Proposed Plan due to the general requirement for zero direct emissions heating systems in new housing development. However, the Council shall continue to engage with SGN as a key stakeholder during plan preparation.

The Council shall consider any proposals emerging from SGN for potential inclusion in the Proposed Plan.

Digital infrastructure

Mobile coverage for Edinburgh is excellent however upgrading of some parts of the city to increase access to full fibre can still be improved. The Proposed Plan should consider if it needs to make any provision for this.

The Proposed Plan will consider if and where it is appropriate and beneficial to identify locations for the development of large scale digital infrastructure, factoring in consideration such as accessibility, green belt and countryside objectives, landscape

impact, the electricity grid, water supply and potential to utilise waste heat and economic benefits.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

01e: Infrastructure - water and waste water

Topic	**01e: Infrastructure - water and waste water**
Description of topic	Review of water supply and waste water services to the area, and how well adapted the drinking water supply is to increased risk of water scarcity
Information required by the Act	Section 15(5) • the infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education facilities); • how that infrastructure is used; Section 15(2B) • a statement of the planning authority's policies and proposals as to the provision of water refill locations.
Relevant NPF4 Policies	• Policy 18 Infrastructure first
Linked topic papers	• Topic 01d Infrastructure - energy and digital infrastructure • Topic 04 Water management, flood risk and coastal development • Topic 06 Green blue infrastructure, open space and recreation • Topic 08 and 09 Climate change and climate mitigation • Topic 12 Housing land
Local Development Plan Guidance	Information on infrastructure capacity, condition, needs and deliverability, within the plan area and cross-boundary. This may relate to existing and planned infrastructure. Stakeholder engagement is expected to inform the preparation of the Evidence Report. An infrastructure first approach should underpin all aspects of plan making, with infrastructure considerations at the heart of place making. This means undertaking early engagement, evidence gathering and where possible data sharing, including with public and private infrastructure providers. This approach also offers potential benefits for infrastructure providers with regard to informing their own plans and strategies. Evidence Reports should address the sewerage and drinking water supply to the area, including areas not connected to public water mains, and how well adapted the drinking water

	supply is to increased risk of water scarcity and drought as a consequence of climate change.
List of and links to evidence	• **CD118** A National Mission with Local Impact: Infrastructure Investment Plan for Scotland – 2021-22 to 2025-26, Scottish Government, February 2021 • **CD265** Climate Ready Edinburgh Plan 2024-2030, City of Edinburgh Council • **CD100** National Planning Framework 4, Scottish Government, February 2023 • **CD648** Our Sustainable Future Together: Long-term strategy, Scottish Water, May 2025 • **CD110** Scotland's Marine Plan: A Single Framework for Managing Our Seas, Marine Scotland, Scottish Government, March 2015 • **CD649** Scottish Water Climate Change Adaptation Plan, Scottish Water, 2024 • **CD651** Scottish Water Water Treatment Works Capacity Map, Scottish Water, 2026 • **CD650** Scottish Water Waste Water Treatment Works Capacity Map, Scottish Water, 2026

List of matters covered

This topic paper considers the following in relation to:

- waste water treatment
- mains water supply
- resilience to drought and climate change.

Summary of evidence

National context

As set out in Scottish Water: Our Sustainable Future Together, Scottish Water pipes Scotland's water and safely removes and treats wastewater. As part of this, Scottish Water engage with the Scottish Government, local authorities and developers to encourage development in areas with existing capacity at water sources and treatment works and seek to support developments using existing assets and infrastructure where possible.

The Infrastructure Investment Plan for Scotland 2021-22 to 2025-26 notes the importance of Sustainable Development Goal 6: to ensure availability and sustainable management of water and sanitation for all. As part of this, Scottish Water are planning to invest 'over £4.5 billion in the next charge control period 2021-27 to maintain and improve services across Scotland, address the challenges of its aging asset base and make progress towards the achievement of its commitment to net zero emissions by 2040.'

Previous norms in terms of Scotland's climate, in particular rainfall patterns, are expected to alter with climate change. Scottish Water's Climate Change Adaptation Plan 2024 notes that 'the climate threat is accelerating – we are seeing more extreme events globally and locally. This means we must go further and faster in adapting the assets that serve Scotland to ensure they remain reliable, resilient and sustainable for customers now and in the years ahead.'

Scotland's National Marine Plan: A Single Framework for Managing Our Seas highlights that treated sewage discharged into the Forth estuary can have negative impacts on human health and aquatic life, however it is noted that effluent treatment has improved.

Local context

Climate Ready Edinburgh explains that 'prolonged periods of hot and dry weather due to increased summer temperatures and reduced rainfall could lead to drought. This will exacerbate the effects of changing rainfall patterns on Edinburgh's lochs and reservoir levels and impact on river levels, wetlands and other water bodies in the city, affecting water availability and quality.' This reinforces the importance of the measures Scottish Water is taking to adapt to this change, but also why it is important that new development is planned in a way that minimises capacity issues to assist with this.

Unlike summer months, it is noted that Edinburgh is expected to experience greater levels of rainfall in during winter months as identified in the Vision for Water Management in the City of Edinburgh. This is a key reason why the Vision identifies the importance of working with stakeholders to remove and reduce stormwater in the combined sewer network. Opportunities to manage surface water away from the sewer network is addressed further in Topic 04 Water management, flood risk and coastal development.

Waste water network

Scottish Water has provided the Council with mapping showing wastewater treatment work capacity.

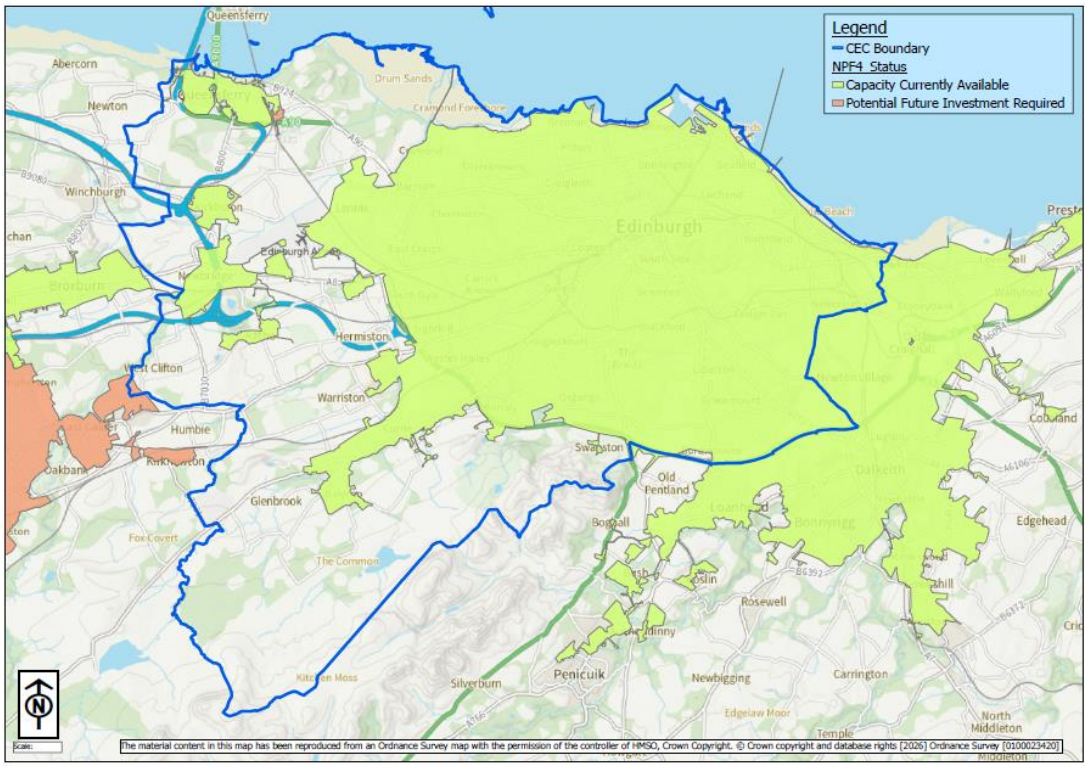


Figure 01e.1: Scottish Water's waste water treatment works capacity

The Seafield waste water treatment works (WWTW) serves Edinburgh including Currie and Balerno. Newbridge waste water treatment works covers most of the city's other western villages and some parts of West Lothian. South Queensferry is served by its own treatment works. All three works have capacity at present.

As Edinburgh's population increases, Scottish Water will continue to monitor capacity at the Seafield treatment works. Current capacity is sufficient for the foreseeable future; however, they note strategic investment may be required to expand capacity as demand grows. This will be addressed through a holistic, strategic approach, including ongoing initiatives to remove surface water from the network and thereby increase flow capacity. The facility also receives flows from East Lothian and Midlothian, and further efforts will be made to reduce surface water inputs from these areas. Working with Scottish Water in the development of the proposed plan it will be important to ensure planned growth and capacity are considered.

Much of Edinburgh's sewer and drainage network is old and handles both wastewater and surface water as part of combined sewers. This leads to increased risk of flooding from the sewer network during significant rainfall events when sewers can become overloaded due to surface water runoff. This risk is increasing with climate change, as we experience more frequent intense rainfall events. The associated flood risk can be reduced where there is opportunity to either attenuate or even disconnect surface water from the sewers. Thus, sustainable management of surface water should therefore be a key consideration during development/ construction projects. Surface water management as a form of flood risk mitigation is discussed in Topic 04 Water management, flood risk and coastal development.

Drinking water supply

Scottish Water has provided the Council with mapping showing water treatment works capacity.

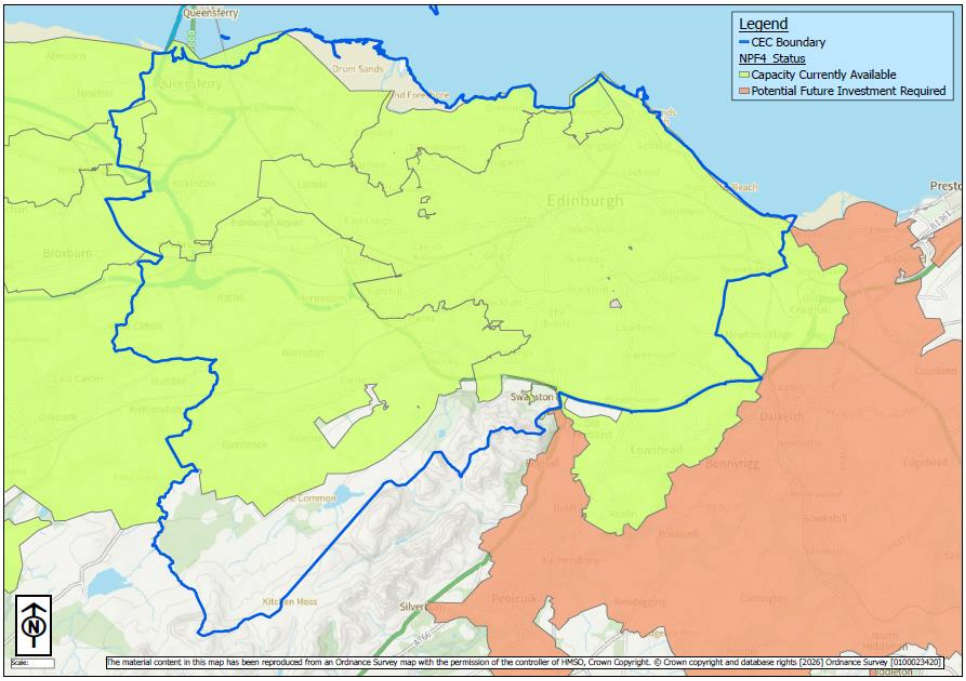


Figure 01e.2: Scottish Water's water treatment works capacity

The City of Edinburgh area is mainly served by Glencorse water treatment works, however Marchbank water treatment works serve the area west of the city and some parts of the city's northern edge, and Balmore covers South Queensferry and Kirkliston. Each of these treatment works presently have capacity.

The main substantive area that is not served by mains water supply is the Pentland Hills and there is also a small extent of non-urban area in the south-west of the city, which is also not connected to Scottish Water's mains water network.

Resilience to drought and climate change

Scottish Water's Our Sustainable Future Together recognises that a key challenge is warmer, drier summers that can lead to drought and deteriorating quality of our raw water resources.

Scottish Water's Climate Adaptation Plan 2024 states that Edinburgh is forecast to be in deficit by 2050 for Supply-Demand-Balance without adaptations. As a result, Scottish Water confirms it is planning and investing in resilient schemes to ensure it will maintain supplies and support growth in Edinburgh and the Lothians. Scottish Water has and will continue to reduce leakage and engage its customers to understand the value of water to change behaviours on consumption.

Scottish Water's Our Sustainable Future Together also recognises the risks from sea level rise and coastal erosion that floods or damages assets. Seafield WWTW as a key coastal asset is at risk given the compounding effects of sea level rise, coastal erosion and cumulative combination of coastal flooding from processes such as

storm surge. The Council's Coastal Change Adaptation Plan (CCAP) will consider this.

Climate change will also result in a significant increase in surface water flood risk. Higher volumes of rainwater falling in short periods of time has the potential to overload the existing surface water and combined sewer networks beyond the capacity of the network to handle. This could result in backing of up surface water from the network and resulting in above ground flooding, including some unsanitary waste water in the case of combined sewers backing up.

Summary of stakeholder engagement

Key Agency	**Scottish Water**
Main views raised	• **Scoping (May 2025):** Scottish Water provided GIS mapping showing treatment works capacity for water and wastewater. During a meeting at this stage, Scottish Water expressed a desire that the Council engage with them at an early stage in preparation of the plan, particularly sending lists of initial candidate sites being considered for inclusion. • **Draft Topic Papers (Nov 2025):** Scottish Water provided suggested amendments to this topic paper which have been incorporated into the relevant sections above on infrastructure, water and waste water and resilience to drought and climate change.
Council response and implications for the proposed plan	Suggested amendments incorporated into this topic paper. The Council agreed with Scottish Water's desire to review a draft version of this topic paper and have provided a number of iterations for review and input. The Council agrees to send an early, provisional list of potential development sites for the new plan to Scottish Water prior to finalising these as through site assessments.
Is the agency content with the evidence?	Scottish Water does not dispute any of the evidence set out in the topic paper. They have advised:' We are in general agreement of the matters relating to our organisation within these topic papers.'
Areas of agreement	Topic paper sufficient.

Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council agrees with Scottish Water that it would be beneficial to send on early list of potential candidate sites being considered for inclusion in the plan. Obviously, it will sometimes be the case that some of these sites may ultimately not be included in the plan, for example if Scottish Water themselves raised issues that excessively constrained a site.

Key Agency	**Marine Directorate**
Main views raised	• **Draft Topic Papers (Nov 2025):** Marine Directorate provided a consultation response noting the relevance of the National Marine Plan to this topic paper.
Council response and implications for the proposed plan	The National Marine Plan and its relevance to this issue has been referred to in the National context section of this topic paper.
Is the agency content with the evidence?	The Marine Directorate does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The National Marine Plan will be considered as a relevant national policy document in the preparation of the plan.

Summary of implications for the Proposed Plan

Waste water network and mains drinking water supply

There is currently capacity at all waste water treatment works and water treatment works serving the Council area which is positive and means development may be possible without the need for upgrading. However, this amount of capacity and the amount of growth planned in Edinburgh will need to be considered. The Council will work with Scottish Water in preparing the Proposed Plan, with any potential locations and scale of development considered in the context of available capacity. If capacity would be exceeded, it would also be important for Scottish Water to confirm that additional capacity could be created, funded and delivered within an appropriate timescale.

Resilience to drought and climate change

The Council shall continue to involve Scottish Water as a key stakeholder in the Coastal Change Adaptation Plan (CCAP), including to ensure that the Seafield waste water treatment works is accounted for.

The Council will continue to engage Scottish Water in preparing the Proposed Plan, to ensure the plan considers any infrastructure proposals or safeguarding highlighted by Scottish Water, for example for the purposes of improving drought resilience.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

01f: Infrastructure - pipelines and hazards

Topic	**01f: Infrastructure - pipelines and hazards**
Description of topic	The major accident hazard pipelines, major hazard establishments, hazardous substance consents and other hazards in the City of Edinburgh Council area.
Information required by the Act	**Town and Country Planning (Scotland) (Act) 1997, as amended:** • section 15 (5) - sets out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used. • section 16B (2) - in preparing the Evidence Report the planning authority are to seek the views of and have regard to any views expressed by key agencies and others. • Regulation 9 - have regard to the location of Control of Major Accident Hazard establishments and/or pipelines.
Relevant NPF4 Policies	• Policy 11 Energy • Policy 23: Health and safety
Local Development Plan Guidance	• Page 76,sets out that information likely required in taking account of NPF4 policy includes the location of major-hazard sites and major accident hazard pipelines, any additional, recently granted Hazardous Substances Consents and any expansion plans for new or existing sites, of businesses/operators using hazardous substances. • Page 77 states that 'mine gases are hazardous to human health. Therefore, in those areas within Scotland where coal mining has taken place in the past, planning authorities are expected to review the relevant maps produced by the Coal Authority that indicate where there are 'development high risk areas', and make reference to these in the Evidence Report.' • Other environmental or pollutant characteristics may be particularly relevant to an area, for example land that has been contaminated, and where known this may be referenced by the Evidence Report.
Linked Topic Papers	• Topic 01a Infrastructure - transport • Topic 01d Infrastructure - energy and digital infrastructure • Topic 01h Infrastructure - minerals, coal and peat • Topic 04 Water management, flood risk and coastal development • Topic 07 Zero waste, energy, heating and cooling • Topic 12 Housing land • Topic 16 Health and wellbeing

List of and links to evidence	• **CD242** 22/05925/HSC, City of Edinburgh Council, Planning Portal, May 2023 • **CD249** 25/03866/HSC, City of Edinburgh Council, Planning Portal, December 2025 • **CD440** Aerodrome Safeguarding, Edinburgh Airport • **CD471** Avoiding danger from overhead power lines Guidance Note GS6 (Fourth Edition) -, Health and Safety Executive, May 2013 • **CD402** Britpits, British Geological Survey, 2026 • **CD584** Central Scottish Coalfields, Northern Mine Research Society, 2003 • **CD033** City Plan 2030 Written Statement, City of Edinburgh Council, November 2024 • **CD544** Coal Mining Data Interactive Map Viewer, Mining Remediation Authority (The Coal Authority),2026 • **CD472** Control of Major Accident Hazards (COMAH) Online Search Tool, Health and Safety Executive, 2015 • **CD458** Directive 2012/18/EU, European Parliament, July 2012 • **CD231** Environmental Protection Act 1990: Part IIA Contaminated Land. Statutory Guidance: Edition 2, Scottish Government Natural Scotland Scottish Executive, May 2006 • **CD308** GIS Atlas, City of Edinburgh Council, 2025 • **CD473** Guidance Note HSG47 Avoiding danger from underground services, Health and Safety Executive, 2014 • **CD654** HP Pipes Gas Networks Dataset, SGN, April 2026 • **CD474** HSE's Land use planning methodology, Health and Safety Executive, April 2025 • **CD475** HSE's planning Advice Web App, Health and Safety Executive, 2026 • **CD695** Information on radon and reports from the Centre for Radiation, Chemical and Environmental Hazards (CRCE), The UK Health Security Agency, September 2022 • **CD322** Land Contamination, City of Edinburgh Council • **CD403** Mining Hazards (not including coal), British Geological Survey, 2026 • **CD550** National Grid NESO's interactive map, National Energy Systems Operator (NESO), 2026 • **CD100** National Planning Framework 4, Scottish Government, February 2023 • **CD178** Planning Advice Note 33: Development of Contaminated Land, Scottish Government, December 2017

- **CD545** Planning Applications and Coal Mining Risk Assessment, Mining Remediation Authority (The Coal Authority), February 2025
- **CD180** Planning Circular 3/2015: Planning controls for hazardous substance, Scottish Government, November 2015
- **CD181** Planning Circular 8/2002: Control of development in airport public safety zones, Scottish Government, October 2002
- **CD476** Public information on establishments subject to COMAH 2015, Health and Safety Executive, 2015
- **CD405** Radon data: Indicative Atlas of Radon, British Geological Survey, 2020
- **CD694** Radon: Indicative atlas in Scotland, UK Government (Public Health England), July 2011
- **CD188** Safeguarding Zones- (Summary and Spatial data), Scottish Government, November 2025
- **CD552** Specification for safe working in the vicinity of National Gas Transmission high pressure gas pipelines and associated installations, National Gas Transmission, March 2024
- **CD663** SPEN's Distributed Generation Heat Maps, Scottish Power, 2026
- **CD228** Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015, Scottish Parliament 2015

List of matters covered

This topic paper sets out the evidence in relation to major accident hazard pipelines, major hazard establishments, hazardous substance consents as well as other hazards, like contaminated land, radon gas, key electrical infrastructure, mines and quarries and airport safeguarding, in the City of Edinburgh Council area.

Summary of evidence

National Context

Major accident hazard pipelines, major hazard establishments, hazardous substance consents

The Health and Safety Executive's (HSE) Land use planning methodology (Background to HSE involvement in land use planning) states that major hazards comprise a wide range of chemical process establishments, fuel and chemical storage sites and major accident hazard pipelines (such as high-pressure gas mains above 7 bar, or petrochemical pipelines).

Planning Circular 3/2015: Planning controls for hazardous substances, describes the implementation of the land use planning elements of European Directive 2012/18EU (The Directive) on the control of major accident hazards involving dangerous substances.

It states that in Scotland, land use planning aspects of the Directive are given effect through the Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015. The Regulations sets out what substances require 'hazardous substances consent' for the presence of such substances at a site and who should be formally consulted.

In considering hazardous substances consent applications, authorities must have regard to material considerations - including the relevant provisions of the development plan. With planning applications for development involving or in the vicinity of hazardous establishments**,** decisions are required to be made in line with the development plan unless material considerations indicate otherwise.

HSE's Public Information on establishments subject to COMAH (Control of Major Accident Hazards Regulations) 2015 states that 'there are two types (tiers) of establishment which are subject to COMAH, known as 'Upper Tier' and 'Lower Tier' depending on the quantity of dangerous substances they hold. Upper Tier establishments will hold greater quantities of dangerous substances meaning that additional requirements are placed on them by the Regulations.'

HSE sets a consultation distance around major hazard sites and major accident hazard pipelines after assessing the risks and likely effects of major accidents at the major hazard. The consultation distances are based on available scientific knowledge using hazard /risk assessment models updated as new knowledge comes to light. Major accidents are also closely studied.

Planning authorities are notified of these consultation distances and have a statutory duty to consult HSE on certain proposed developments within it. This should be done through HSE's Planning Advice Web App.

Contamination

The definition of 'contaminated land' in Part IIA of the Environmental Protection Act 1990 as amended, Section 78A(2) is as follows:

'Contaminated Land' is any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that –

(a) significant harm is being caused or there is a significant possibility of such harm being caused; or (b) significant pollution of the water environment is being caused or there is a significant possibility of such pollution being caused.

Planning Advice Note (PAN) 33: Development of contaminated land states that 'land can be contaminated by a variety of substances that pose immediate or long-term risks to human health and the environment. Such contaminants may escape from the site to cause air, land, surface water or groundwater pollution, and in some cases may even damage buildings and underground services or contaminate the food chain.'

Paragraph 3 of PAN 33 states 'the planning system has a key part to play in addressing the problem of historical contamination. In pursuing policies to re-use and redevelop sites, developers and planning authorities need to be aware of contamination issues, and the role of the planning system in dealing with them.'

PAN 33 further states in paragraph 1, under the heading Development Plans, 'in preparing development plans, planning authorities are expected to encourage and promote the re-use of brownfield land, including contaminated sites. Development plans provide an opportunity for authorities to set out their priorities for the reclamation and re-use of contaminated land, and to inform developers of the availability of sites, and the potential constraints attached to them.'

Paragraph 2 of PAN 33 states 'effective policy making should be based on adequate and accurate information. Any survey preparatory to drawing up development plans should identify, as far as possible, the physical and chemical constraints on land within the plan area. The requirement under Part IIA for local authorities to identify contaminated land in their area should furnish a more complete information base on sites than has hitherto been the case, even where the land is found not to be Part IIA contaminated land.'

Radon

The UK Health Security Agency's Information on radon and reports from the Centre for Radiation, Chemical and Environmental Hazards, (CRCE) states that 'radon is a colourless, odourless radioactive gas. It is formed by the radioactive decay of small amounts of uranium that occur naturally in all rocks and soils. The main danger from high radon exposure is the increased risk of lung cancer. For most people, radon is the single largest source of radiation exposure whether they are at home or at work'.

The Public Health England's Radon: Indicative Atlas of Scotland guidance presents an overview of the results of detailed mapping of radon potential in Scotland, defined as the estimated percentage of homes in an area at or above the radon action level.

Key electrical infrastructure

Transmission network shapefiles from the National Energy Systems interactive map and the Scottish Power Energy Networks distribution heat maps, show the key elements of Scotland's electrical grid infrastructure. These are the grid supply points, primary substations, high voltage (HV) lines and extra high voltage (EHV) lines.

The HSE guidance note: Avoiding danger from overhead power lines, states ‘the law requires that work may be carried out in close proximity to live overhead lines only when there is no alternative and only when the risks are acceptable and can be properly controlled.’

The HSE guidance note: Avoiding danger from underground services highlights the potential risks of working near underground services and explains the three basic elements of a safe system of work during excavation: Planning the work, locating and identifying buried services and safe excavation.

Mines and quarries

The Coal Authority’s Planning applications and Coal Mining Risk Assessment guidance, states that in common with other consultees, the Coal Authority defines development areas based on their degree of risk. The Planning applications and Coal Mining Risk Assessments guidance states ‘all land within the coalfield falls within either our Development High Risk Area or Development Low Risk Area. They provide an interactive map viewer of sites that fall within low or high risk.’

The British Geological Survey (BGS) Mining Hazard (not including coal coverage) provides GIS datasets which identify areas of known and recorded underground (non-coal) working in Great Britain. The BGS Britpits dataset provides information on surface and underground mineral workings.

Airport safeguarding

Planning Circular 8/2002 sets out that public safety zones are areas of land at the end of the runways at the busiest airports, within which development is restricted in order to control the number of people on the ground at risk of death or injury in the event of an aircraft accident on take-off or landing. Edinburgh is one of five airports in Scotland which has a public safety zone. The public safety zones are based upon risk contours as modelled. The risk contours are estimated to be remodelled at intervals of about seven years. There is a general presumption against development within public safety zones, however, the circular does also set out what development is permissible within certain contours of the zones.

The individual risk contours are sent to planning authorities whose areas are affected by them. It further states that local plans should have a policy relating to public safety zones and that the extent of the zones and any 1 in 10,000 individual risk contours should be indicated on proposal maps accompanying local plans.

NPF4

The key NPF4 policy in relation to this topic paper is Policy 23 Health and safety. Its policy intent is to protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

Policy 23 states that spatial strategies should maintain appropriate distances between sites with hazardous substances and areas where the public are likely to be present and areas of particular natural sensitivity or interest.

The NPF4 Policy 23 criteria below are particularly relevant:

g) Development proposals within the vicinity of a major accident hazard site or major accident hazard pipeline (because of the presence of toxic, highly reactive, explosive or inflammable substances) will consider the associated risks and potential impacts of the proposal and the major accident hazard site/pipeline of being located in proximity to one another

h) Applications for hazardous substances consent will consider the likely potential impacts on surrounding populations and the environment

i) Any advice from Health and Safety Executive, the Office of Nuclear Regulation or the Scottish Environment Protection Agency that planning permission or hazardous substances consent should be refused, or conditions to be attached to a grant of consent, should not be overridden by the decision maker without the most careful consideration

j) Similar considerations apply in respect of development proposals either for or near licensed explosive sites (including military explosive storage sites)

NPF4 Policy 11 Energy is also relevant as its policy intent covers new and replacement energy transmission and distribution infrastructure.

Local Context

The City of Edinburgh Council website page on land contamination states that the Council is required to check land in its area for contamination. Like much of Scotland, there are areas where chemicals may be present in the soil. This is mainly due to past industrial activity, but some substances may occur naturally. The Council is required to keep a register of such land.

Edinburgh Airport Safeguarding Zones summary and spatial data states ‘Edinburgh Airport has several safeguarding zones: a 30km radius for general development that might affect flight paths, a 13km radius for bird strike prevention which includes monitoring areas with water and waste disposal, and a 5km no-fly zone for drones.’ This data is shared with local authorities. These zones require the local planning authority to consult with the airport on applications within these zones to prevent adverse impacts on flight safety.

The consultation body within Edinburgh Airport is Aerodrome Safeguarding. Its webpage sets out that aerodrome safeguarding is a legal requirement for an airport under both ICAO (International Civil Aviation Organisation) regulations and UK CAA

regulations. It further establishes that there are three main types of aerodrome safeguarding:

- Physical safeguarding – this protects a set of flight safety surfaces around the aerodrome and assesses the height of a proposed object, structure or building to ensure it does not physically infringe what are known as Obstacle Limitation Surfaces (OLS) or affect Instrument Flight Procedures (IFPs)
- Technical Safeguarding – this protects aircraft navigational equipment (including our main radar used by Air Traffic Control) from any interference or disruption by obstacles or structures in the area
- Wildlife and Landscape Management - bird strikes are the number one hazard on and around the airfield, therefore it is crucial that we have oversight of developments and areas which include water features, waste disposal sites, and landscaping as these have the potential to increase bird activity.

The key City Plan 2030 policies in relation to this topic are as follows:

Policy Env 34 Pollution and Air, Water and Soil Quality states ‘development will not be supported that would be subject to and/or have a significant adverse effects for health, amenity and the environment (including air, soil and water quality as well as ground stability, erosion and noise) unless any detrimental impacts are adequately addressed by design and layout (or by mitigation only if a design/layout solution is not possible) and that these measures are appropriate for the development and site context.’

Paragraph 3.173 states ‘in applying the policy above there is a particular presumption against development that would increase the risk of major accidents and in this respect, the Council shall have particular regard the proximity of locations such as Hazardous Substances Consent Sites. A health impact, air quality, and/or noise impact assessment may also be required to support a proposal.’

Policy Inf 20 Minerals confirms that there are currently three operational quarries in the Council area - Hillwood (dormant), Bonnington Mains and Ravelrig. These are shown in the City Plan 2030 Proposals Map.

Major Accident Hazard Pipelines

The Council has maps of the national transmission system (NTS) high pressure gas pipeline, local transmission system (LTS) gas pipelines and petrochemical pipelines which run through the City of Edinburgh Council area. The location of the major accident hazard pipelines and their HSE consultation distance zones have been downloaded into the Council’s Uniform mapping system.

The major accident hazard pipelines and HSE consultation zones will be taken into consideration as part of the City Plan 2040 Site Appraisal Methodology carried out

during the Proposed Plan stage. National Gas, Scotland Gas Networks and HSE will be fully consulted in this regard.

Major Hazard Sites and Hazardous Substance Consents

Using HSE's COMAH 2015 public information search tool establishes that there are two sites in Wheatfield Road in Gorgie, Edinburgh, which are covered by the COMAH Regulations 2015. Both of these sites are lower tier establishments. One site produces pharmaceuticals (Macfarlan Smith) and the other is a grain distillery related to the North British Distillery Company.

The Ineos Forties Pipeline System (FPS) installation site at Dalmeny is, however, classed as an upper tier establishment dealing in petrochemicals and oil refinery.

The mapping of all of these sites and their HSE consultation distance zones have been downloaded into the Council's Uniform mapping system.

Internal planning application data indicates that there have been five Hazardous Substance Consents granted since 2015. Two have been at the Royal Elizabeth Yard in Kirkliston. Application 22/05925/HSC for a whisky maturation warehousing site (which was not implemented) and 25/03866/HSC for relocation of the approved whisky maturation warehouse within the Royal Elizabeth Yard. Application 20/01709/HSC and 24/01879/HSC were for the variation of a hazardous substance consent at 10 Wheatfield Road (Macfarlan Smith), whilst application 16/04554/HSC was for hazardous substance consent at 9 Wheatfield Road (North British Distillery). These applications are also shown in the Uniform mapping system.

The sites covered by the COMAH Regulations 2015 and approved Hazardous Substances Consents will be taken into consideration as part of the City Plan 2040 Site Appraisal Methodology carried out during the proposed plan stage. HSE and SEPA will also be fully consulted.

Contaminated land

The City of Edinburgh Council's register of contaminated land is currently empty as the Council have not found land that meets the legal definition of contaminated land (as set out in the Environmental Protection Act 1990 as amended, Section 78A (2)). If the Council find any such land it will place those details on its register, which will be available to view at Council offices and online.

Through discussions with Development Management, Building Standards and Environmental Protection, it has been confirmed that in the majority of cases, contamination will be dealt by conditions attached to planning consents, where relevant. This will ensure that development will carry out remediation to the degree that it would not subsequently fall under the definition of contaminated land under the part IIA regime.

The Council's Uniform mapping system has a list of sites within the City of Edinburgh Council area which have a historic land use of a possible contaminative nature. Sites with a possible contaminative nature will be identified through the Uniform mapping system and will be taken into consideration as part of the City Plan 2040 Site Appraisal Methodology carried out during the Proposed Plan stage. Development Management and Environmental Protection will be fully consulted as requested.

Radon

The Public Health England, Indicative Atlas of Radon in Scotland shows that the City of Edinburgh Council falls within the lower, intermediate and higher radon probability areas. Discussions with the Council's Environmental Protection officers have shown that the Council also has access to higher resolution radon potential mapping provided by the British Geological Survey (BGS). However, Environmental Protection has noted that only testing can definitively determine the radiation levels within an individual property. New developments which are proposed in areas potentially affected by radon can, however, be designed to minimise the risk of radon gas accumulation.

The areas of varying radon probability have been mapped in the Council's Uniform system. The radon possibility of proposed sites shall be identified and will be taken into consideration as part of the City Plan 2040 Site Appraisal Methodology carried out during the proposed plan stage. Environmental Health and Building Standards will be fully consulted.

Key electrical infrastructure

The National Energy Systems interactive map shows that there are currently 10 key (132Kv to 275Kv) substations located within the City of Edinburgh Council area: Currie (x2), Sighthill, Dewar Place, Gorgie, Telford Road, Shrubhill, Portobello, Kaimes and Whitehouse.

The Scottish Power Energy Networks distribution heat maps show that many extra high voltage (EHV) lines are routed underground within Edinburgh with only some overhead EHV power lines being present to the west of the city and to the east in often countryside/green belt settings. As a result, potential hazards from key elements of the electricity grid infrastructure with the City of Edinburgh Council area are not always obvious.

It is proposed that the location of this key electrical infrastructure will be taken into consideration as part of the City Plan 2040 Site Appraisal Methodology carried out during the Proposed Plan stage. If any sites were to potentially impact upon this sometimes-hidden infrastructure, the potential issue could be noted and addressed early. Scottish Power Energy Networks will be fully consulted.

Mines and quarries

As the Northern Mine Research Society (NMRS) confirms there are no collieries currently operating in Scotland.

However, the Coal Authority confirmed that its records indicate that within the Edinburgh area, there are recorded coal mining features present at surface and shallow depth including mine entries, coal workings and reported surface hazards.

The Coal Authority online map viewer shows that there is a large area of mining features present to the south-east of the city and a smaller area to the north, both of which include development high risk areas. There are also other much smaller areas of potential mining features present dotted throughout the city.

The Coal Authority in its initial response also asked if a separate policy relating to land instability could be considered.

The BGS datasets provided confirm that there were a number of historic quarries also previously present within the City of Edinburgh Council area.

The mining and quarrying risk areas, highlighted by the Coal Authority and the BGS, have been downloaded into the Council's Uniform mapping system. The three operational quarries present within the Council area are also shown in the City Plan 2030 proposals maps and online mapping systems.

The mining and quarrying risk areas, identified in the Uniform mapping system, will be taken into consideration as part of the City Plan 2040 Site Appraisal carried out during the Proposed Plan stage. The Coal Authority and BGS will be fully consulted.

A policy relating to land instability as suggested by the Coal Authority will also be considered for the new Plan.

Airport Safeguarding

The current City Plan Proposals Map and the online City of Edinburgh Council GIS Atlas clearly show 1 in 10,000 individual risk contours around Edinburgh Airport as well as safeguarding zones. City Plan 2030, policy Inf 15 directly addresses the Edinburgh Airport Public Safety Zones.

Ongoing consultation with Edinburgh Airport will ensure that the airport public safety zones and risk contours are accurately shown in City Plan 2040 mapping and that a policy addressing airport public safety zones is also included. The airport public safety zone and risk contours will be taken into consideration as part of the City Plan 2040 Site Appraisal Methodology carried out during the Proposed Plan stage.

It is acknowledged that the Royal Air Force (RAF) base at Kirknewton is also located within the City of Edinburgh Council area and needs to be considered during the proposed plan stage. The RAF will be consulted with regards to the Proposed Plan.

Summary of stakeholder engagement

There are no Key Agencies comments in relation to this topic paper.

Other engagement and matters raised

Scoping (May 2025): The Coal Authority responded stating that its records indicate that within the Edinburgh area there are recorded coal mining features present at surface and shallow depth including mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. It also requested that a policy is included in the plan which covers the topic of land instability to ensure that the issue is addressed when new development is proposed. A policy relating to land instability as suggested by the Coal Authority will be considered during the Proposed Plan stage.

Draft Topic Papers (Nov 2025): The Coal Authority responded confirming that their correct legal name at this time is still 'The Coal Authority'. The topic paper was corrected as a result.

Final Topic Papers (March 2026): The Coal Authority and Scotland Gas Networks have confirmed that they are content with the evidence. Edinburgh Airport Limited commented that they broadly supported the content and direction of the topic papers. They asked for clarity however to ensure that safeguarding and safety considerations were appropriately future proofed. These comments have been addressed.

Internal discussions took place with Development Management, Building Standards and Environmental Protection. Both Development Management and Environment Protection have requested that when potential sites are being considered they should be further consulted to ensure that potential contaminated land concerns are fully considered. Development Management, Building Standards and Environmental Protection have confirmed that they are content with the evidence.

Summary of implications for the Proposed Plan

- The mapping of the major accident hazard pipelines and accompanying HSE consultation distance zones will be taken into consideration as part of the Proposed Plan site appraisal process. National Gas, Scotland Gas Networks and the Health and Safety Executive will be consulted.

- The consultation distance zones and any development restrictions applied to the sites that are covered by the COMAH Regulations 2015 and sites with approved Hazardous Substances Consents will be taken into consideration as part of the Proposed Plan site appraisal process. Applications and consents for Hazardous Substances Consent will continue to be monitored. The Health and Safety Executive and Scottish Environmental Protection Agency will be consulted.

- Proposed sites will be checked to see whether they have a historic land use of a possible contaminative nature. This potential constraint will be taken into consideration as part of the Proposed Plan site appraisal process. This will highlight whether potential remediation may be required.

- The radon possibility of proposed sites shall be identified and will be taken into consideration as part of the Proposed Plan site appraisal process. It will highlight whether potential remediation may be required.

- The location of key electrical infrastructure will be taken into consideration as part of the Proposed Plan site appraisal process. Scottish Power Energy Networks will be consulted as part of this process.

- Potential mining and quarrying risk areas, located within the City of Edinburgh Council area, will be taken into consideration as part of the Proposed Plan site appraisal process. The Coal Authority and British Geological Survey will be consulted.

- A policy relating to land instability as suggested by the Coal Authority will be considered during the plan process.

- The Edinburgh airport public safety zone and risk contours will be taken into consideration as part of the Proposed Plan site appraisal process. Ongoing consultation with Edinburgh Airport will ensure that the airport public safety zones and risk contours are accurate and address any potential policy requirements for airport public safety zones. The RAF will also be consulted with regards to the Kirknewton air base.

- Requirement for a local policy relating to pollution and air, water and soil quality will be explored in the context of NPF4.

- The Council will continue to ensure that all data is up to date with regards to the major accident hazard pipelines, major hazard establishments, hazardous substance consents and other hazards in the City of Edinburgh Council area.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

01g: Infrastructure - cemeteries, crematoriums and mortuaries

Topic	**01g: Infrastructure - cemeteries, crematoriums and mortuaries**
Description of topic	The cemetery, crematorium and mortuary infrastructure of the City of Edinburgh Council area
Information required by the Act	**Town and Country Planning (Scotland) (Act) 1997, as amended:** • Section 15 (5) - set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used. • Section 16B (2) - in preparing the Evidence Report the planning authority are to seek the views of and have regard to any views expressed by key agencies and others.
Relevant NPF4 Policies	• Policy 4 Natural places • Policy 7 Historic assets and places • Policy 15 Local living and 20 minute neighbourhoods • Policy 18 Infrastructure first • Policy 22 Flood risk and water management
Local Development Plan Guidance	• Local Place Plans may provide information about heritage assets valued by community groups. Engagement using the Place Standard Tool may also generate information about locally valued heritage. Planning authorities may take the opportunity to consider in consultation with Historic Environment Scotland where designation records could be amended or updated. • Page 68 states that 'an infrastructure first approach should underpin all aspects of plan making, with infrastructure considerations at the heart of place making. This means undertaking early engagement, evidence gathering and where possible data sharing, including with public and private infrastructure providers.' • The Evidence Report may reference baseline infrastructure information and data including: • NPF4; relevant aspects of the spatial strategy and national developments; • national, regional and local infrastructure investment plans and strategies relating to an area for both the public and private sectors; and • A review of existing infrastructure capacity and condition, as well as identifying planned infrastructure,

	both within a district, but also cross-boundary infrastructure, which serves the district.
Linked Topic Papers	• Topic 02 Natural places • Topic 04 Water management, flood risk and coastal development • Topic 06 Blue green infrastructure, open space and recreation • Topic 10 Historic assets and places • Topic 20 Tourism, culture and creativity
List of and links to evidence	• **CD611** Assessing Risks to Water Environment Associated with Burial Ground, Scottish Environmental Protection Agency (SEPA), June 2024. • **CD120** Burial and Cremation (Scotland) Act 2016, Scottish Government, April 2016. • **CD257** Cemetery Strategy, City of Edinburgh Council, November 2021 • **CD033** City Plan 2030- Written Statement, City of Edinburgh Council, November 2024 • **CD456** Edinburgh Graveyards Project, Edinburgh World Heritage, 2023 • **CD302** Edinburgh's Thriving Greenspaces 2050 Vision and Strategy, City of Edinburgh Council, April 2025 • **CD121** Burial Regulations: Guidance, Scottish Government, February 2025 • **CD100** NPF4, Scottish Government, February 2023 • **CD696** Old and New Towns of Edinburgh, UNESCO, 1995 • **CD685** Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, UK Government, February 1997. • **CD563** Subnational Population Projection; 2022 based, National Records of Scotland, September 2025 • **CD224** The Public Health etc. (Scotland) Act 2008, Scottish Government, July 2008

List of matters covered

This topic paper sets out the evidence in relation to the cemetery, crematorium and mortuary infrastructure in the City of Edinburgh Council area.

Summary of evidence

National

The Burial and Cremation (Scotland) Act 2016 requires the Council to provide one burial ground within the area of the local authority. The Act also states that the

Council may provide other burial grounds within that area and that a local authority may provide a burial ground that is situated wholly or partly out with the area of the authority. Any two or more local authorities may make arrangements to provide jointly a burial ground within the area of one or more of the authorities.

The Burial and Cremation (Scotland) Act states that a local authority may provide a crematorium and enter into arrangements with another person to provide a crematorium on behalf of the local authority. However, there is no statutory requirement for this.

The Public Health etc. (Scotland) Act 2008 states that a local authority needs to have a body storage provision. The City of Edinburgh Council currently also provides this service for East Lothian, West Lothian, Midlothian and the Borders as the City Mortuary. Under the Public Health Act, the Council does not have to provide forensic facilities.

Regulation 3 of the Guidance on the Burial (Management) (Scotland) Regulations 2025 requires burial grounds to be maintained in 'good order'. 'The standards of maintenance required will depend on the general use of the burial ground and frequency of visitors. Woodland burial grounds, for example, may require less intensive maintenance than other burial grounds. City centre historic burial grounds can attract high numbers of visitors and may have old, large structures which require more careful maintenance and management.'

SEPA guidance on Assessing Risks to Water Environment Associated with Burial Grounds provides guidance on the protection of the water environment from burial grounds and cemeteries. It is intended for developers and local authorities developing or extending burial grounds. The guidance is particularly relevant should land for new cemeteries within the City of Edinburgh Council area be required.

The key NPF4 policies are:

- Policy 4 Natural places: the intent of this policy is to protect, restore and enhance natural assets making the best use of nature-based solutions. If land was required for new cemeteries the protection of the natural environment would be a key consideration.

- Policy 7 Historic assets and places: it states that Local Development Plans (LDPS), including through their spatial strategies, should support the sustainable management of the historic environment. They should identify, protect and enhance valued historic assets and places. This includes the City's listed and historic burial grounds and those that are part of the Edinburgh Old and New Towns of Edinburgh World Heritage Site.

- Policy 15 Local Living and 20 minute neighbourhoods: One of the policy outcomes is that new and existing communities are planned together with homes and the key local infrastructure including schools, community centres, local shops, greenspaces (Like cemeteries), health and social care, digital and sustainable transport links.

- Policy 18 Infrastructure First: Its policy intent is to encourage, promote and facilitate an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of placemaking.

- Policy 22 Flood risk and water management: Its policy intent is to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding. If land was required for new cemeteries, flood risk and water management would be key considerations.

Local Context

There are a range of cemeteries located within the City of Edinburgh Council area which are listed under the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997.

There are five historic cemeteries located within the Edinburgh Old and New Towns of Edinburgh World Heritage Site: Greyfriars Kirkyard, Canongate Kirkyard, St Cuthbert's Cemetery and Old Calton Burial Ground and New Calton Cemetery. With the exception of the New Calton Cemetery which is category B listed, they are all category A listed.

Edinburgh World Heritage (EWH) states in its Edinburgh Graveyards Project that 'each of these sites is at risk; suffering not only at the hands of weathering and erosion but also from limited resources, anti-social behaviour and a lack of awareness of their value as local green open spaces.' This Project co-ordinated a joined-up approach aimed at revitalising these cemeteries so that they become well-loved community resources as well as 'must-see' visitor attractions.

The City of Edinburgh Council's Cemetery Strategy (2021) sets out the six strategic objectives of the cemetery service. These are the provision of:

- safe spaces
- poignant places of remembrance and reflection
- cemeteries, managed in compliance with Burial and Cremations (Scotland) Act 2016
- sufficient space for coffin interments

- environmental greenspace (linking to the Edinburgh Thriving Green Spaces project at present) and
- managed cemeteries, including those within the historic world heritage site.

The Cemetery Strategy included a survey that was carried out in relation to whether the proposed City Plan 2030 should have identified space for additional cemetery provision, including the potential for green and woodland burials. 76% of the 816 responses stated that they agreed that City Plan 2030 should have identified space for additional provision.

One of the key concerns raised in the responses to the survey was in relation to the potential impact new cemeteries could have on wildlife and biodiversity as well as the potential impact of cemeteries contaminating ground water. Other comments submitted showed that cemeteries were seen as valuable greenspaces.

The Edinburgh Thriving Greenspaces 2050 Vision and Strategy is concerned with the care, management and improvement of Edinburgh Council's greenspaces. The Strategy includes the city's cemeteries. Its four main strategic ambitions are that greenspaces are connected, thriving, valued and resourced.

City Plan 2030 does not have a specific policy nor allocation for cemeteries, crematoriums or mortuaries. However, the following policies are relevant as they are key considerations for cemeteries, crematoriums and mortuaries: infrastructure capacity, protection of world heritage sites and listed buildings, protection of archaeological remains, open space, green blue infrastructure and protection of the environment.

The relevant City Plan 2030 Policies are:

- Inf 3 Infrastructure Delivery and Developer Contributions
- Env 6 Green Blue Infrastructure
- Env 9 World Heritage Sites
- Env 11 Listed Buildings - Setting
- Env 16 Protection of Important Archaeological remains and the historic environment
- Env 20 Protection of Trees and Woodlands
- Env 21 Protection of Biodiversity
- Env 23 Open Space Protection
- Env 34 Pollution and Air, Water and Soil Quality.

City Mortuary

The Council's Bereavement Service has confirmed that the City Mortuary, which provides both mortuary services and post-mortem examination facilities, is no longer

fit for purpose, it is not DDA compliant and the existing site is too small for expansion. However, no decision has currently been made on a new site.

Private Cemeteries

Bereavement Services has confirmed that there are currently four cemeteries/ graveyards in private/church control. Many of these are historic in nature and only a few, such as Mount Vernon Roman Catholic Cemetery and Seafield, still operate, albeit with limited capacity. It is not aware of plans for new private burial facilities apart from the Muslim community who is actively looking for new grounds.

Council owned Cemeteries

City of Edinburgh Council's Cemetery Strategy (2021) states that the City of Edinburgh Council owns and operates 42 cemeteries as listed below:

Historic City Centre	Operational	Non-Operational
Canongate	Comely Bank	Buccleuch Churchyard
Greyfriars	Corstorphine Hill	Colinton Churchyard
New Calton	Craigmillar Castle Park	Corstorphine Churchyard
Old Calton	Currie	Cramond Churchyard
St Cuthbert's	Grange	Currie Churchyard
	Kirkliston Cemetery	Dalmeny Churchyard
	Liberton	Dalry
	Morningside	Duddingston Churchyard
	Mortonhall	East Preston Street
	Portobello	Gogar
	Ratho	Kirkliston Churchyard
	Rosebank	Liberton Churchyard
	Saughton	Mount Alvernia Convent
	South Queensferry	Newington
		North Leith
		North Merchiston
		Queensferry Vennel
		St Mary's Ratho
		St Triduana's Restalrig
		Sciennes Jewish
		South Leith Churchyard
		Warriston
		Wauchope/Greendykes

Figure 01g.1: List of Council-owned and operated cemeteries

Council owned cemeteries occupy 77 hectares of ground, broken down into three categories (Historic, Operational and Non-Operational), each of which require different management strategies.

There are only 14 operational cemeteries where coffin interments still take place. Bereavement Services has confirmed that the majority of these operational cemeteries now have very limited capacity for burials.

The main operational cemetery within the city is Craigmillar Castle Park. However, Phase 1 of the cemetery, which opened in 2010, now only has burial spaces for approximately the next 3-4 years. The Muslim designated section of the cemetery is already full.

Bereavement Services has confirmed that work towards developing phase 2 of Craigmillar Castle Park cemetery is now underway. The second phase of the cemetery was to provide burial spaces for a further 25 years but it is now estimated that it will only provide capacity for 10-15 years, as death rates within the city in forthcoming years are likely to be above the historic average. This is due to a projected continual rise in the city's population and like that of all 32 Scottish council areas, it is also predicted to age.

Bereavement Services has also stated that whilst only approximately 20% of people choose to be buried; some religious faiths such as Catholic and Muslim require burial. The Muslim faith also requires only one burial per plot.

With predicted higher death rates within the city, as a result of a growing and aging population, and continued demand for burials, the requirements and pressures for new cemetery provision is likely to continue.

The Cemetery Strategy notes that alongside the work to identify space for additional cemetery provision, the Cemeteries team will also investigate the potential for providing other types of burials and burial sites, for example natural burial sites.

The Proposed Plan therefore should consider the potential land requirement within the City of Edinburgh Council area for new cemeteries (including natural burial sites) and for particular faiths.

The survey carried out by the Cemetery Strategy (2021) showed that respondents were concerned that new cemeteries could impact upon existing wildlife and biodiversity as well as potentially contaminating ground water. This concern is also highlighted in SEPA guidance on Assessing Risks to Water Environment Associated with Burial Grounds. The Proposed Plan should therefore consider the possible environmental impacts of potential sites for cemeteries. SEPA and NatureScot should be fully consulted along with relevant Council services.

The City of Edinburgh Council's Cemetery Strategy sets out that Bereavement Services will ensure that cemeteries will be safe, poignant places of remembrance and reflection as well as being environmental greenspaces.

Bereavement Services is currently working with the Edinburgh Thriving Green Spaces 2050 Vision and Strategy project, which aims to protect and enhance the city's greenspaces, so that they benefit people today and in the long term. The

Edinburgh Thriving Greenspaces Vision and Strategy 2050 notes that greenspaces should be connected, thriving, valued and resourced.

NPF4 Policy 15 Local Living and 20 minute neighbourhoods sets out that new and existing communities should be planned together with homes and the key local infrastructure like greenspaces.

The Proposed Plan should therefore ensure that valuable greenspaces such as existing cemeteries should be a consideration in terms of any future housing site assessment, ensuring that they remain accessible to local communities.

The location of any potential new cemetery should also be considered as accessible and valuable greenspace. NatureScot should be fully consulted as well as relevant Council services.

Bereavement Services manage the Council owned cemeteries, including those within the Edinburgh Old and New Towns of Edinburgh World Heritage Site, in compliance with the Burials and Cremation (Scotland) Act 2016. The Proposed Plan will need to consider the special architectural or historical interest of these listed cemeteries in discussion with Historic Environment Scotland, Edinburgh World Heritage and the Council's Heritage, Cultural Venues & Museums.

Crematoriums

There are three large operating crematoriums within the City of Edinburgh Council area. Warriston and Seafield crematoriums are in private ownership whilst Mortonhall is owned by the Council. Bereavement Services has stated that these crematoriums are aged and require upgrading/modernisation but will not require expansion/ additional land take.

Summary of stakeholder engagement

Key Agency	SEPA
Main views raised	**Draft Topic Papers (Nov 2025):** SEPA advised the inclusion of their guidance "Assessing Risks to Water Environment Associated with Burial Grounds". This was added to the topic paper along with a suitable narrative. Links to the topic paper 4 (water management flood risk and coastal development) were also made as a result.
Council response and implications for the proposed plan	If land was to be allocated for a new cemetery the SEPA guidance "Assessing Risks to Water Environment Associated with Burial Grounds" will be fully taken into consideration.
Is the agency content with the evidence?	The agency is content with the evidence.
Areas of agreement	Agree that SEPA guidance "Assessing Risks to Water Environment Associated with Burial Grounds" should be included in the topic paper and that the guidance will be considered if land was to be allocated for a new cemetery.
Outstanding Issues	There are no outstanding issues.
Actions proposed for plan stage	SEPA and NatureScot will be consulted along with relevant Council services including Flood Management, Bereavement Services, Parks and Openspace, Estates and Heritage, Cultural Venues & Museums at the Proposed Plan stage to ensure that if land was proposed to be allocated for a cemetery, then the potential environmental impacts would be fully assessed. SEPA's guidance "Assessing Risks to Water Environment Associated with Burial Grounds" will be fully taken into consideration.

Other engagement and matters raised

Internal discussions took place with the Council's Bereavement Services as well as Parks and Open Space and Estates teams. Discussions included the capacity of existing cemetery infrastructure and potential future need. Bereavement Services, Parks and Open Space and Estates teams have confirmed that they are content with the evidence.

Summary of implications for the Proposed Plan

- The Proposed Plan shall consider the potential land requirement within the City of Edinburgh Council area relating to the growing need for cemeteries.

- If land was to be allocated for a new cemetery, the potential environmental impacts of the cemetery would need to be fully studied. SEPA and NatureScot will be fully consulted along with relevant Council services including Flood Management, Bereavement Services, Parks and Open Space, Estates and Heritage, Cultural Venues and Museums.
- SEPA's guidance "Assessing Risks to Water Environment Associated with Burial Grounds" will be taken into consideration.
- In identifying any new cemetery space its ability to act as additional greenspace for communities and other environment and biodiversity benefits will be taken into account. This will be done working with Council services including Parks and Open Space and Bereavement Services and in consultation with NatureScot.
- The Proposed Plan shall consider the special architectural or historical interest of the historic cemeteries and the qualities of the Edinburgh World Heritage site and its setting.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

01h: Infrastructure - minerals, coal and peat

Topic	**01h: Infrastructure - minerals, coal and peat**
Description of topic	The minerals, coal and peat infrastructure of the City of Edinburgh Council area
Information required by the Act	**Town and Country Planning (Scotland) (Act) 1997, as amended:** • Section 15 (5) the principal economic and environmental characteristics of the district • Section 16B (2) 'in preparing the Evidence Report the planning authority are to seek the views of and have regard to any views expressed by key agencies and others.'
Relevant NPF4 Policies	• Policy 5 Soils • Policy 8 Green belts • Policy 12 Zero waste • Policy 23 Health and safety • Policy 33 Minerals
Local Development Plan Guidance	The Evidence Report may include information that can demonstrate if the planning authority is capable of meeting at least a 10 year landbank of construction aggregate in relevant market areas. Relevant types of information include: • information on existing permitted minerals reserves within the plan area • any relevant elements from the latest Aggregates Survey around usage trends. This information can help inform whether there is a sufficient supply of minerals or whether it is expected that further releases are required and • where appropriate a local aggregates survey undertaken with local operators to better understand demand and reserves. In areas where there is a history of being reliant on other planning authorities to help meet their construction aggregate future needs, it is for the planning authority to determine how best to provide evidence that these future supply chains are capable of meeting future demand.
Linked Topic Papers	• Topic 01f Infrastructure - pipelines and hazards • Topic 02 Natural places • Topic 03 Green belt, countryside and rural • Topic 04 Water management, flood risk and coastal development

List of and links to evidence	• **CD684** Aggregate Minerals Survey for Great Britain 2023, Ministry of Housing, Communities and Local Government, UK Government, August 2025 • **CD584** Central Scottish Coalfields Northern Mine Research Society, 2003 • **CD033** City Plan 2030 Written Statement, City of Edinburgh Council, November 2024. • **CD140** Environmental Assessment (Scotland) Act 2005, Scottish Government, December 2005, • **CD693** Future of the Subsurface, UK Government (Government Office for Science), June 2024 (updated November 2024) • **CD404** Onshore Mineral Resources Map (East Lothian, Midlothian, West Lothian and City of Edinburgh), British Geological Survey, 2008 • **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023 • **CD591** PPA-230-2541, Appeal Decision Notice, Planning and Environmental Appeals Division, February 2025 • **CD592** PPA-230-2582, Planning Permission Appeal, Planning and Environmental Appeals Division, April 2026 • **CD190** Scotland's Circular Economy & Waste route map to 2030, Scottish Government, December 2024 • **CD101** Town and Country Planning (Scotland) Act 1997, Scottish Government, February 1997 • **CD240** 22/02513/FUL- Decision Notice, City of Edinburgh Council, June 2023 • **CD241** City of Edinburgh Council, 22/02514/FUL- Decision Notice, City of Edinburgh Council, June 2023 • **CD2544** 24/01146/FUL- Development Management Sub Committee Report, City of Edinburgh Council, September 2024 • **CD243** 24/01146/FUL- Decision Notice, City of Edinburgh Council, September 2024 • **CD246** 24/05865/FUL- Development Management Sub Committee Report, City of Edinburgh Council, April 2025. • **CD245** 24/05865/FUL- Decision Notice, City of Edinburgh Council, May 2025 • **CD247** 24/06100/FUL- Decision Notice, City of Edinburgh Council, May 2025 • **CD248** 24/06106/FUL- Decision Notice, City of Edinburgh Council, May 2025

List of matters covered

This topic paper sets out the evidence in relation to minerals, coal and peat.

Summary of evidence

National Context

The Government Office for Science paper Future of the Subsurface states that ‘use of the subsurface has been vital for people for thousands of years. The availability of subsurface resources such as water, fertile soil, and building materials, has long influenced where we choose to live. The UK’s diverse geology also plays a significant role in shaping its landscape, and influences various aspects of land use, planning, and society.

The subsurface today houses different assets and services required for everyday life. These include water supply, sewers, energy, waste storage, building foundations and transportation, as well as resources like minerals and aggregates that are essential to our economy. With the demand for these set to increase, pressures on the subsurface are likely to grow over the coming decades.

The subsurface will play an increasingly vital role in reaching our net zero ambitions, in how we adapt to climate change, and in how we grasp the opportunities presented by technological innovation. As these needs drive competition for space, there is a risk that congestion could limit our options for how we use it in the future.’

2023 Aggregate Minerals Survey

The 2023 Aggregate Minerals Survey (AM 2023) for Great Britain produced by the British Geological Survey (BGS) states that ‘aggregate minerals surveys provide an in-depth and up-to-date understanding of national and sub-national sales, inter-regional flows, transportation, consumption and permitted reserves of primary aggregates. The results of these surveys provide comprehensive data for monitoring and facilitating aggregates provision at local, regional and national level. The output is used mainly by government, planning authorities, industry and environmental interest groups. The surveys are used to inform the development of minerals policy in respect of the production, movement and consumption of aggregates.’

A summary of the results of the AM 2023 survey is as follows:

- In Scotland, total sales of primary aggregates were 21.7 million tonnes (Mt) in 2023, an increase of 4%.

- In Scotland, primary aggregate sales comprised 19% land-won sand and gravel and 81% crushed rock. Igneous rock is the most important source of

primary aggregates in Scotland. It accounted for 91% of total crushed rock sales in 2023, with sandstone (6%) and limestone (3%) comprising the remainder

- Total apparent consumption of primary aggregates in Great Britain was 164.0 Mt in 2023, of which 137.1 Mt was used in England, 15.5 Mt in Scotland and 11.5 Mt in Wales.

- England was a net importer of primary aggregates (11.7 Mt), while Wales (3.9 Mt) and Scotland (6.2 Mt) were net exporters.

- Total permitted reserves of aggregate in active and inactive sites in Great Britain, including sites worked in the past but still containing reserves (but not dormant sites) and sites that have yet to be opened, at the end of 2023 were 5,106 Mt. Crushed rock accounted for 90% (4,589 Mt) and sand and gravel the remaining 10% (518 Mt).

- Of total permitted reserves, 84% were in active sites, 61% in England, 26% in Scotland and 12% in Wales.

- Total permitted reserves of sand and gravel in Great Britain for non-aggregate use were 38.0 Mt in 2023. Total permitted reserves of crushed rock for non-aggregate use were 370.1 Mt of which 84% was limestone/dolomite. The reported reserves for non-aggregate use, however, does not include all non-aggregate reserves in Great Britain as only those sites producing aggregates are included in the AM 2023 survey.

Scotland's Circular Economy and Waste Route Map to 2030 states support for the development of a model for regional Scottish hubs and networks for the re-use of construction materials and assets over the period 2025-27 which could provide a circular source of minerals reducing the need for virgin minerals.

NPF4

The key NPF4 policy in relation to this topic paper is Policy 33 Minerals. The intent of this policy is to support the sustainable management of resources and minimise the impacts of the extraction of minerals on communities and the environment.

The outcomes of this policy are:

- sufficient resources are available to meet industry demands, making an essential contribution to the Scottish economy

- important raw materials for manufacturing, construction, agriculture, and other industries are available

- important workable mineral resources are protected from sterilisation by other developments

- communities and the environment are protected from the impacts of mineral extraction.

Policy 33 states that LDPs should support a landbank of construction aggregates of at least 10 years at all times in the relevant market areas, whilst promoting sustainable resource management, safeguarding important workable mineral resources, which are of economic or conservation value, and take steps to ensure these are not sterilised by other types of development.

It sets out that development proposals that seek to explore, develop and produce fossil fuels (like coal and peat) will not be supported other than in exceptional circumstances and that the Scottish Government does not support the development of unconventional oil and gas in Scotland. This relates to onshore exploration, appraisal or production of coal bed methane.

Policy 33 is clear that development proposals that would sterilise mineral deposits of economic value will only be supported where:

i. there is an overriding need for the development and prior extraction of the mineral cannot reasonably be undertaken; or
ii. extraction of the mineral is impracticable or unlikely to be environmentally acceptable.

Criterion d) of NPF4 Policy 33 establishes that development proposals for the sustainable extraction of minerals will only be supported where they:

i. will not result in significant adverse impacts on biodiversity, geodiversity and the natural environment, sensitive habitats and the historic environment, as well as landscape and visual impacts

ii. provide an adequate buffer zone between sites and settlements taking account of the specific circumstances of individual proposals, including size, duration, location, method of working, topography, and the characteristics of the various environmental effects likely to arise

iii. can demonstrate that there are no significant adverse impacts (including cumulative impact) on any nearby homes, local communities and known sensitive receptors and designations

iv. demonstrate acceptable levels (including cumulative impact) of noise, dust, vibration and potential pollution of land, air and water

v. minimise transport impacts through the number and length of lorry trips and by using rail or water transport wherever practical

vi. have appropriate mitigation plans in place for any adverse impacts

vii. include schemes for a high standard of restoration and aftercare and commitment that such work is undertaken at the earliest opportunity. As a further safeguard a range of financial guarantee options are available, and the most effective solution should be considered and agreed on a site-by-site basis. Solutions should provide assurance and clarity over the amount and period of the guarantee and in particular, where it is a bond, the risks covered (including operator failure) and the triggers for calling in a bond, including payment terms.

Other key NPF4 policies include:

Policy 5 Soils: Its policy intent is to protect carbon rich soils, restore peatlands and minimise disturbance to soils from development.

Policy 8 Green belts: Its policy intent is to encourage, promote and facilitate compact urban growth and use the land around towns and cities sustainably. Policy 8 lists a number of criteria in (a) (i) in which development proposals within a green belt designated within the LDP will be supported. Minerals operations are one of those criteria as long as they comply with the other requirements set out with part (ii).

Policy 12 Zero waste states that one of its policy outcomes is that the reduction and reuse of materials in construction is prioritised. The reduction and reuse of construction materials could reduce the need for virgin minerals and mining.

Policy 23 Health and safety states that its policy intent is to protect people and places from environmental harm, mitigating risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing. As detailed in Topic 01f Infrastructure – pipelines and hazards, mines and quarries are potential hazard sites.

Local Context

The key City Plan 2030 policy in relation to minerals, coal and peat is Policy Inf 20 Minerals.

It states ‘planning permission will be granted for development to extract minerals from the quarries identified on the Proposals Map: Hillwood, Bonnington Mains, Ravelrig and Craigiehill Quarry. Development which would prevent or significantly constrain the potential to extract minerals from these sites with economically viable mineral deposits will not be allowed.

It is important to protect economically viable mineral deposits from sterilisation by permanent development. The only mineral resource within the area likely to be economically viable in the Plan period is hard rock. There are three operational quarries in the Council area - Hillwood (dormant), Bonnington Mains and Ravelrig. The above policy is intended to protect that resource, and to ensure that new development does not introduce conflict which would prejudice mineral operations.

The Plan area also includes deposits of coal in the west and southeast and small areas of peat in the southwest. Proposals for their extraction will be assessed for their environmental and traffic impact using other policies in this Plan. An additional consideration, when assessing proposals affecting peat, is its role as a carbon sink.’

Other key City Plan 2030 policies include:

Policy Env 18 Development in the Green Belt and Countryside which states ‘within the Green Belt and Countryside shown in the Proposals Map, development must meet one of the following criteria and not detract from the rural environment or landscape of the surrounding area in terms of its quality, characteristics and views:

(a) For the purposes of agriculture, woodland and forestry, horticulture or countryside recreation, or where a countryside location is essential and provided any buildings, structures or hard standing areas are of a scale and quality of design appropriate to the use.

Criterion (a) of Policy Env 18 applies in the context of minerals operations as the three operational quarries within the City are located within a countryside/green belt setting.

Minerals, coal and peat operations all have the potential to have impacts upon health, amenity and the environment. As such Policy Env 34 Pollution and Air, Water and Soil Quality applies. It states ‘development will not be supported that would be subject to and/or have a significant adverse effects for health, amenity and the environment (including air, soil and water quality as well as ground stability, erosion and noise) unless any detrimental impacts are adequately addressed by design and layout (or by mitigation only if a design/layout solution is not possible) and that these measures are appropriate for the development and site context.’

Strategic Environmental Assessment (SEA)

The SEA Scoping Report will be prepared in accordance with Section 15 of the Environmental Assessment (Scotland) Act 2005. The SEA Scoping Report will set out the City of Edinburgh Council area's baseline in the form of the key environmental characteristics, its environmental objectives, problems and framework for assessing environmental effects. The SEA Scoping Report will include minerals.

Quarries in Edinburgh and 10 Year Land Supply

The most up to date available data with regards to aggregate minerals comes from the collation of the results of the 2023 Aggregate Minerals Survey (AM) for Great Britain which was published in 2025. The City of Edinburgh Council is grouped as part of the East Central Scotland Region in this survey. East Central Scotland includes East Lothian, City of Edinburgh Council, Fife, Midlothian, Scottish Borders and West Lothian.

The following map shows the Local Planning Authorities and the 2023 Aggregate Minerals regions in Scotland:

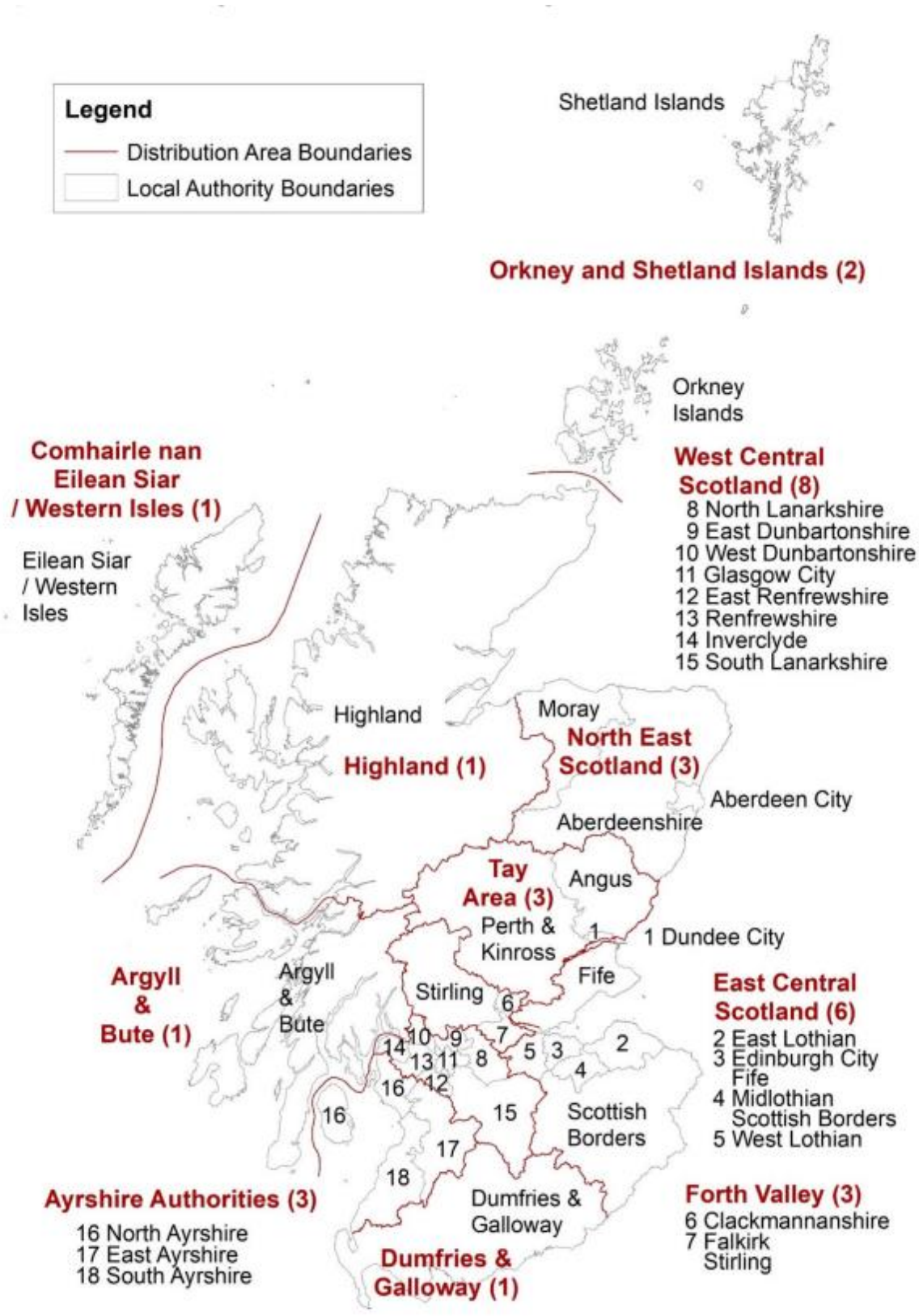


Figure 01h.1: Collation of the AM 2023 Survey (source: page 20, Aggregates Mineral Survey 2023)

Sand and Gravel Reserves

East Central Scotland is the Scottish region with the highest level of land-won (not marine dredged) sand and gravel reserves, with the AM 2023 survey indicating permitted reserves of 27.853 Mt at active sites or 34.904 Mt when inactive sites are taken into consideration (AM 2023 Table 12, permitted reserves of land-won primary aggregates in active and inactive sites at 31 December 2023, page 122).

There are no marine dredged supplies of sand and gravel in East Central Scotland in the AM 2023 survey. Paragraph 2.4 of the AM 2023 survey states that sites classified as dormant under the Town and Country Planning (Scotland) Act 1997 were not included in the totals.

Table 1b of the AM 2023 survey (summary of sales of primary aggregates in 2023, page 41), shows that total sales of land-won sand and gravel are 1.211 Mt for East Central Scotland. It clarifies that sales of primary aggregates include sales from land-based quarries but not imports of aggregates from other regions or countries.

Table 4P (sales of aggregates and aggregate minerals by region in 2023: East Central Scotland, page 59) shows that sales of sand and gravel within the home region were 0.563 Mt, whilst sales outside the home region to Ayrshire Authorities, Dumfries and Galloway, Tay Area and West Central Scotland were 0.647 Mt.

Table 2b of the AM 2023 survey, (page 42), shows that the total consumption of land won sand and gravel within East Central Scotland is 0.779 Mt.

Table 5p (consumption of primary aggregates by region in 2023: East Central Scotland, page 81) shows that East Central Scotland imported a total of 0.217 Mt of sand and gravel from Ayrshire Authorities, Tay area and West Central Scotland.

The table below uses data from the AM 2023 survey and shows the sand and gravel, situation at end of 2023. It shows that based on the various metrics above East Central Scotland has more than a 10-year landbank of sand and gravel.

Landbank at active sites based on total sales	23 years
Landbank at active sites based on home regional sales	49 years
Landbank at active sites based on total consumption (home regional sales plus imports)	36 years
Landbank at active and inactive sites based on total sales	29 years
Landbank at active and inactive sites based on home regional sales	62 years

Landbank at active and inactive sites based on total consumption (home regional sales plus imports)	45 years

Figure 01h.2: Sand and gravel situation at the end of 2023 (source: AM 2023 Survey)

Crushed Rock Reserves

The AM 2023 survey Table 12 shows that in terms of crushed rock for aggregate use East Central Scotland has reserves of 48.267 Mt on active sites and 77.648 Mt when inactive sites are included.

Table 1b of the AM 2023 survey shows that sales of crushed rock are 2.432 Mt for East Central Scotland.

Table 4P shows that sales of crushed rock within the home region were 1.631 Mt, whilst sales outside the home region to Argyll & Bute, Forth Valley, Highland, North East Scotland, Tay Area, West Central Scotland and England were 0.800Mt.

Table 2b states that the total consumption of crushed rock within East Central Scotland is 2.336 Mt.

Table 5p shows that East Central Scotland imported a total of 0.705 Mt of crushed rock from Ayrshire Authorities, Highlands, West Central Scotland and England.

The table below again uses data from the AM 2023 survey and shows the crushed rock situation at the end of 2023. It shows that based on the various metrics above East Central Scotland has more than a 10-year landbank of crushed rock.

Landbank at active sites based on total sales	20 years
Landbank at active sites based on home regional sales	30 years
Landbank at active sites based on total consumption (home regional sales plus imports)	21 years
Landbank at active and inactive sites based on total sales	32 years
Landbank at active and inactive sites based on home regional sales	48 years
Landbank at active and inactive sites based on total consumption (home regional sales plus imports)	33 years

Figure 01h.3: Crushed rock situation at the end of 2013 (source: AM 2023 Survey)

Trends and Supply Chains

The table below shows the comparison of sales of primary aggregates between 2019 and 2023 in the East Central Scotland area. (comparison of sales of primary aggregates in 2019 and 2023, page 9, AM 2023 survey).

	2019	2023	% Change
Sales of sand and gravel	0.739Mt	1.211Mt	64% Increase
Sales of crushed rock	2.142Mt	2.432Mt	14% Increase
Sales of total primary aggregates	2.88Mt	3.642Mt	26% Increase

Figure 01h.4: Comparison of sales of primary aggregates between 2019 and 2023 (source: AM 2023 Survey)

The table above shows that there has been an increase in the sales of both sand and gravel and crushed rock from quarries within the East Central Scotland area between 2019 and 2023. This has resulted in an overall 26% increase in the sales of primary aggregates in the East Central Scotland area between 2019 and 2023.

The table below shows the comparison of consumption of primary aggregates between 2019 and 2023 in the East Central Scotland area (Table D2 Comparison of consumption of primary aggregates 1973, 1977, 1985, 1989, 1993, 1997, 2001, 2005, 2009, 2014, 2019 and 2023, page 168-169 of the AM 2023).

Years	2019	2023	% Change
Consumption of sand and gravel	0.480Mt	0.779Mt	62% Increase
Consumption of crushed rock	2.105Mt	2.336Mt	11% Increase
Consumption of total primary aggregates	2.585Mt	3.115Mt	21% Increase

Figure 01h.5: Comparison of consumption of primary aggregates between 2019 and 2023 (source: AM 2023 Survey)

The table shows that there has been an increase in the consumption of sand and gravel and crushed rock within the East Central Scotland area between 2019 and 2023. This has resulted in an overall 21% increase in the consumption of primary aggregates in the East Central Scotland area between 2019 and 2023.

Table 3 (summary of exports and primary aggregates in 2023) in the AM 2023 survey, page 43, shows that East Central Scotland exports 0.647Mt of sand and gravel whilst it imports 0.217Mt. The table also shows that East Central Scotland exports 0.8Mt of crushed rock whilst it imports 0.705Mt.

Chapter 6 of the AM 2023 survey (Consumption) states that East Central Scotland is one of the five regions within Scotland which are net exporters of aggregates.

Applications at operating mineral sites within the City of Edinburgh Council area

In the last four years, there have been six planning applications related to existing mineral operation sites within the City of Edinburgh Council area. These are Bonnington Mains (Operated by Breedon Trading Ltd) and Ravelrig (Operated by Tarmac). The applications are set out below:

22/02513/FUL: Land 177 Metres West of Bonnington Mains Quarry- Development of field for ancillary quarrying operations

The application was for ancillary quarrying operations. It included a site office and associated car parking, water attenuation and settlement ponds, aggregate processing and storage, including aggregate storage sheds and an asphalt plant (previously approved to be developed within the existing quarry boundary). Primary crushing and some stockpiling would continue to be undertaken within the quarry void, whilst secondary crushing, screening and stockpiling would be undertaken within the Field Extension Area.

In addition, it was proposed to develop a workshop and aggregate storage sheds within the existing quarry boundary alongside the concrete plant. Furthermore, it was proposed to import 'RAP' (Reclaimed Asphalt Pavement) for recycling and reuse within the asphalt plant. This material would be removed from old worn roads and surfaces and imported into the site where it would be processed and stocked within the site prior to use within the proposed asphalt plant. No change was proposed to the extraction limit of 375,000 tonnes per annum (as outlined in Condition 17 of the 2017 application).

The application was approved at Development Management Sub Committee on 23 June 2023. The decision notice states ‘the proposed development is in accordance with the Local Development Plan and NPF4. The proposals do not conflict with equalities & human rights. The proposals are acceptable and there are no material considerations that outweigh this conclusion.’

22/02514/FUL: Land 177 Metres West of Bonnington Mains Quarry- Extraction of Quartz-Dolerite and erection of plant and ancillary structure (Section 42 Application to vary conditions 2, 13, 15, 16 and 18 of Planning Permission 17/05930/FUL).

The proposed changes related to the following:

- Condition 2 - Changes to the placement of the environmental bund/overburden along the western boundary of the quarry site

- Condition 13 - Hours of operation where the asphalt plant is to include night-time working (24 hour working)
- Condition 15 - Noise levels from nominal operations increased to a uniform 55dB(A)LAeq at noise sensitive properties and the introduction of a 42dB(A)LAeq during nighttime operations (outwith hours (i.e. all hours outwith Monday-Friday: 07:00-19:00; Saturday: 07:00-19:00 and Sunday: 10:00-14:00)
- Condition 16 - Changes to the site access involving the introduction of a dual entry weighbridge/office and internal circle/roundabout
- Condition 18 - Site restoration conditions whereby within 5 years of the date of this permission, a plan illustrating the proposed final restoration of the site shall be submitted and approved by the Planning Authority.

Application 22/02514/FUL was approved at Development Management Sub Committee on 23 June 2023. The report to the Development Management Sub Committee states that 'the proposals comply with the development plan and NPF4 subject to the conditions below.'

24/01146/FUL: Bonnington Mains Quarry- Extraction of Quartz-Dolerite and erection of plant and ancillary structures (Section 42 application to vary condition 8 associated with air overpressure limits attached to planning permission 22/02514/FUL)

The application was refused at Development Management Sub- Committee on 18 September 2024. The reason for refusal in the decision notice was 'the proposal will have an adverse impact on residential amenity contrary to LDP policy Des 5 a) (Amenity).'

The decision was appealed to the Planning and Environmental Appeals Division (DPEA). The appeal was allowed and planning permission granted under PPA-230-2541 on 14 February 2025.

The appeal decision notice states 'the proposal (with my proposed conditions) would comply overall with the relevant provisions of the development plan. Despite the wide range of issues raised, there are no material considerations which, in my view, would still justify refusing to grant planning permission. My proposed conditions also provide for monitoring measures where appropriate. Specifically, they require monitoring of blasting (and air overpressure), and I require the incorporation of monitoring measures within the blast method statement to be submitted. There is no evidence to suggest that other monitoring measures are required'.

24/05865/FUL: Bonnington Mains Quarry- Lateral extension to the quarry, erection and operation of Materials Recycling Plant (MRP), infilling of the quarry and restoration to the agricultural grassland.

The application proposes an extension of the quarry into the field to its south-west. This would increase the quarry footprint from 78,600 m² to 131,200 m² at its maximum. It is stated this would produce a further 4.1 million tonnes of reserve at the quarry to sustain production for 11 to 16 years.

The application was refused at Development Management Sub- Committee on 20 May 2025.

The decision notice states 'the proposed site is not allocated for either the expansion or formation of a new quarry in relation to LDP Policy Inf 20. Whilst LDP Policy Env 18 supports expansion of existing uses within the countryside, the proposed environmental impact outweighs this consideration.'

An appeal against the decision has been submitted to the DPEA on 4 June 2025. (PPA-230-2582). As of the time of writing, the appeal is still ongoing.

24/06100/FUL: Ravelrig Quarry- Section 42 planning application by Tarmac for planning permission to operate not in compliance with Conditions 1, 10, 11, 15, 21, 34, 35 and 36 planning permission 08/00140/FUL.

The application sought to vary or operate not in compliance with Conditions 1 (referral to Scottish Ministers), 11 (blast monitoring and noise monitoring of two nearest properties), 15 (Air Overpressure), 21 (Watercourse Pollution), 34 (Archaeology), 35 (Extraction Activities, Working, Restoration and Aftercare) and 36 (Temporary Soil Bund) of planning permission 08/00140/FUL.

Planning permission was granted at Development Management Sub Committee on 6 May 2025.

The reason for decision in the decision notice states 'the recommended conditions ensure the application complies with the Development Plan. Though amenity impacts to neighbouring residents are foreseen, the degree of impact is to be sufficiently mitigated such that it is not unreasonable, secured by condition. Further conditions have been attached as appropriate to ensure the proposal will not result in a significant or unreasonable adverse impact to landscape, trees, soils or transport. The proposal has due regard to the climate and nature crisis as well as other aspects of sustainability and biodiversity, meeting the relevant policy requirements subject to conditions. The proposals are in accordance with the Development Plan. There are no other material considerations which outweigh this conclusion. It is therefore recommended that this application be granted.'

24/06106/FUL: Ravelrig Quarry- Extension of Ravelrig Quarry to allow further extraction of hard rock; change of use from woodland and grassland to quarry**.**

The application proposed an extension area of 14.6ha, giving a total planning application area of 71.6ha with a total excavation area of 40.6ha. A reserve of 9.5 million tonnes of hard rock (dolerite) has been identified, to be excavated at a rate of up to 600,000 tonnes per annum. Permission was sought for extraction over a period of up to 24 years, with a further year for restoration works to 2050.

Planning permission was granted at Development Management Sub Committee on 6th May 2025. The decision notice states ‘subject to conditions, the proposal is acceptable in principle. Mineral extraction has been long established at the site and is supported at Ravelrig Quarry by the Development Plan. The location is essential and no significant adverse impact to the area's rural character or landscape quality is identified, subject to mitigation secured by conditions. Soils and other materials are to be stored for reuse as part of restoration works. Though amenity impacts to neighbouring residents are foreseen, the degree of impact is to be sufficiently mitigated such that it is not unreasonable, secured by condition. Further conditions have been attached as appropriate to ensure the proposal will not result in a significant or unreasonable adverse impact to heritage assets, archaeology, landscape, trees or transport. The proposal has due regard to the climate and nature crisis as well as other aspects of sustainability and biodiversity, meeting the relevant policy requirements subject to conditions. The proposals are in accordance with the Development Plan. There are no other material considerations which outweigh this conclusion.’

The six planning applications, in the last 4 years, relating to existing sites within the City of Edinburgh Council area indicates that mineral operators are willing to invest in these sites and that they have a future in ensuring that the City of Edinburgh Council, as part of the East Central Scotland, will continue to maintain a landbank of construction aggregates of at least 10-years at all times in the relevant market areas.

Coal and peat

The City of Edinburgh Council area has no active collieries. This is in line with the national picture as noted in the Northern Mine Research Society (NMRS- Central Scottish Coalfields) which confirms there are no operational collieries in Scotland.

The detailed map of the mineral resources for East Lothian, Midlothian, West Lothian and City of Edinburgh provided by the British Geological Survey (BGS) confirms that there are deposits of coal in the west and southeast and small areas of peat in the southwest of the Council area in the Pentland Hills.

NPF4 Policy 33 Minerals does not permit extraction of fossil fuels (excluding unconventional gas) unless in exceptional circumstances. City Plan 2030 notes proposals for extraction will be assessed for their environmental and traffic impact using other policies in this Plan. There are currently no planning applications for extraction of fossil fuels in the Council area.

Summary of stakeholder engagement

- **Scoping (May 2025):** Coal Authority stated that it is 'pleased to see that mining and ground conditions are identified in the matters covered and that we are identified as an evidence source. We would request that a policy is included in the plan which covers the topic of land instability to ensure that this issue is addressed when new development is proposed.' A policy relating to land instability as suggested by the Coal Authority will be considered during the formation of City Plan 2040.

  The BGS responded by providing datasets on a variety of topics which include BGS Minerals Resources map, BGS BritPits/Mines and Quarries, BGS Geology 50K and 10k and BGS Geology Report.

  Nature Scot commented that peatland management is a cross-cutting issue and should be addressed in multiple topic papers.

- **Draft Topic Papers (Nov 2025):** No specific comments related to Infrastructure - minerals, coal and peat were received as part of this engagement stage.

- **Final Topic Papers (March 2026):** The Coal Authority has confirmed that it is content with the evidence.

- **Other:** Internal discussions took place with the Council's Development Management teams who have spoken to minerals operators, their agents and relevant Community Councils during the course of the six planning applications that have been submitted over the previous 4 years. Development Management has confirmed that it is content with the evidence.

- The Heads of Planning Scotland: Minerals Officers' Working Group has also been attended to collaborate on the matter of LDP Evidence Report methodologies for Minerals, including sourcing information for, and calculating, landbanks. Local Planning Authorities in attendance were: Angus, Argyll and Bute, City of Edinburgh Council, Comhairle nan Eilean Siar, East

Ayrshire, Fife, Midlothian, Orkney, Perth and Kinross, Renfrewshire, Scottish Borders, West Dunbarton and West Lothian.

Summary of implications for the Proposed Plan

- The Proposed Plan will ensure that City of Edinburgh Council continues to maintain at least a 10-year landbank of construction aggregate in relevant market areas whilst promoting sustainable resource management, safeguarding important workable mineral resources, which are of economic or conservation value, and take steps to ensure that these are not sterilised by other types of development. There will be engagement with minerals operators in preparation of the Proposed Plan to understand their operational intentions, including any future potential expansions, and to ensure that mineral sites are clearly identified. Inclusion of policy to support minerals operations in identified locations will be explored in the context of NPF4.

- A policy relating to land instability as suggested by the Coal Authority will be considered during Proposed Plan stage in the context of NPF4.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

02: Natural Places

Topic	**02: Natural Places**
Description of topic	Analysis and implications of information on important natural assets, including habitats, landscapes, woodland and soils.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15 (5) - The principal physical and environmental characteristics of the district.
Relevant NPF4 Policies	• Policy 1 Tackling the climate and nature crises • Policy 4 Natural places • Policy 5 Soils • Policy 6 Forestry, Woodland and Trees
Local Development Plan Guidance	Natural Places (page 111) and NPF 4 Policy 4 requires LDPs to 'identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area.' This should be informed by the review of locally important natural assets. The Evidence Report is also required to consider the likely soil assets in the area, including peatland and carbon-rich soils (page 43) and include information on the woodland resource within the authority area, to help identify trees and woodlands of high nature conservation value (page 44). Green Belts (page 47) and Energy (page 116) set out that local authorities may wish to undertake a Local Landscape Character Assessment to inform Green Belt review and Landscape Sensitivity Studies to evidence opportunities for energy developments.
Linked Topic Papers	• Topic 03 Green belt, countryside and rural • Topic 04 Water management, flood risk and coastal development • Topic 05 Biodiversity

	• Topic 06 Green blue infrastructure, open space and recreation • Topic 07 Zero waste, energy, heating and cooling • Topic 08 and 09 Climate change and climate mitigation • Topic 10 Historic assets and places • Topic 16 Health and wellbeing • Place Profiles
List of and links to evidence	• **CD575** SiteLink, NatureScot • **CD570** Guidance on Establishing and Managing Local Nature Conservation Site Systems in Scotland – 2023 update, NatureScot, March 2024 • **CD514** Guidance on Designating Local Landscape Areas, Historic Environment Scotland and NatureScot, October 2020 • **CD577** Scottish Landscape Character Types Map and Descriptions, NatureScot, 2019 • **CD572** Habitats Regulations Appraisal (HRA) of Local Development Plans (LDPs) - Guidance for Planning Authorities in Scotland, NatureScot, November 2023 • **CD192** Scotland's Forestry Strategy 2019 to 2029, Scottish Government, February 2019 • **CD691** The UK Forestry Standard (5th edition), UK Government (Forestry Commission), 2023 • **CD2332** Scottish Government's Policy on Control on Woodland Removal (2009), Scottish Government (Forestry Commission Scotland), February 2009 • **CD466** National Forest Inventory Scotland 2023, Forestry Commission Open Data, March 2025 • **CD637** Native Woodland Survey of Scotland, Scottish Forestry, September 2025 • **CD565** Ancient Woodland Inventory, NatureScot, October 2000 • **CD638** Technical Note on Preparing a Forestry and Woodland Strategy, Scottish Forestry, February 2026 • **CD398** Tree Equity Score UK, American Forests, The Woodland Trust and the Centre for Sustainable Healthcare, 2023 • **CD225** The Scottish Soil Framework, Scottish Government, May 2009 • **CD669** The UK Soil Observatory (UKSO) map viewer, The UK Soil Observatory (UKSO) • **CD643** Scotland's Geodiversity Charter (2025-2030), Scottish Geology Trust and British Geological Survey, 2025 • **CD568** Central Scotland Green Network (CSGN) - 2021 Habitat Connectivity Map, NatureScot, 2023

- **CD535** Edinburgh and Lothians Tree and Woodland Strategy 2012-2017, Land Use Consultants Ltd (LUC), October 2012
- **CD327** Local Nature Reserves, City of Edinburgh Council, February 2024
- **CD326** Local Biodiversity Sites, City of Edinburgh Council, April 2024
- **CD446** Edinburgh's Local Geodiversity Sites, Edinburgh Geological Society
- **CD642** Scotland's Geosites, Scottish Geology Trust
- **CD641** Geoguide, Scottish Geology Trust
- **CD533** City of Edinburgh Council Landscape Character Assessment 2026, Land Use Consultants Ltd (LUC), February 2026
- **CD534** City of Edinburgh Council Review of Local Landscape Designations, LUC, February 2026
- **CD590** Edinburgh Survey of Gardens and Designed Landscapes, Peter McGowan Associates, November 2009
- **CD334** Open Space Audit 2016, City of Edinburgh Council, December 2016
- **CD333** Open Space 2021 - Edinburgh's Open Space Strategy, City of Edinburgh Council, December 2016
- **CD378** Tree Preservation Orders, City of Edinburgh Council, April 2026
- **CD461** Valuing Edinburgh's Urban Trees - An update to the 2011 i-Tree Eco survey – a report of Edinburgh City Council, Forestry Commission Scotland, and Forest Research, 2017
- **CD379** Trees in the City, City of Edinburgh Council, September 2023
- **CD371** City of Edinburgh Council Ash Dieback Action Plan, City of Edinburgh Council, February 2022
- **CD392** Edinburgh Million Tree City, City of Edinburgh Council
- **CD706** City of Edinburgh Tree Equity Summary, Woodland Trust Scotland, 2025
- **CD100** National Planning Framework 4, Scottish Government, February 2023

List of matters covered

Natural places, including protected areas, biodiversity, soils, forestry and woodland are vital components of our environment and support a range of ecosystem services. A healthy environment is essential to support resilience to a changing climate, underpin a strong economy and provide a range of recreation and tourism opportunities, when accompanied by appropriate management.

This topic paper considers the evidence in relation to important natural assets, including protected areas for biodiversity and landscape, forestry, woodland and trees and soils, structured as follows:

- Protected Areas
    - International
    - National
    - Regional
    - Local
- Environmental Assessment
- Forestry, woodland and trees
- Soils

Summary of evidence

Protected Areas

NPF 4 Policy 4 requires LDPs to 'identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts.' The spatial strategy should take into account these sites and ensure their objectives are protected and enhanced when allocating land for development. Edinburgh is fortunate to have sites designated for biodiversity, landscape, geodiversity and recreation at an international, national and local level. These sites are briefly described below. Information on international and national sites are all available on NatureScot's SiteLink website.

International

There is one Ramsar site within the authority area, the Firth of Forth Ramsar. This is classified under the Convention on Wetlands of International Importance and underpins the Firth of Forth Special Protection Area.

European Sites

There are two Special Protection Area (SPA) within the city boundary – the Firth of Forth SPA and Imperial Dock Lock, Leith SPA. There is further connectivity with two other SPAs in the Firth of Forth, Forth Islands SPA and the Outer Firth of Forth and St Andrews Bay Complex SPA. These sites will be considered in the Habitats Regulations Appraisal (HRA) of the Proposed Plan. Consideration will also be given to other European Sites where an impact pathway may exist. City Plan 2040 is not yet at a stage where screening can be undertaken for likely significant effects, however consideration can be given at this stage as to what evidence is required to inform the HRA. This is set out in this topic paper and in the Biodiversity topic paper.

National

Sites of Special Scientific Interest

There are seven Sites of Special Scientific Interest (SSSI) within the Council boundary, designated for both biodiversity and geodiversity interests. These sites are designated by NatureScot under the Nature Conservation (Scotland) Act 2004. Sites are set out in the table below. The most recently assessed condition of these sites varies, with many features in unfavourable condition. Recreational pressure, invasive species, water management and climate change are recognised as key negative pressures on these sites.

Site	Biological/Geological
Agassiz Rock	Geological
Arthur's Seat Volcano	Biological & Geological
Balerno Common	Biological
Duddingston Loch	Biological & Geological
Firth of Forth	Biological & Geological
Inchmickery	Biological
Wester Craiglockhart	Biological

Figure 02.1: Sites of Special Scientific Interest within the Council boundary and reason for protection

Geological Conservation Review Sites

There are seven Geological Conservation Review sites within the Council area. These sites contain geological and geomorphological features of national and international importance. All of the GCR sites within Edinburgh are also designated as SSSI.

Regional

Regional Park

The Pentland Hills is designated as a Regional Park. The Regional Park is within three local authority areas, though management is overseen by the City of Edinburgh Council Natural Heritage Service.

Local

Local Nature Reserve

There are currently 7 Local Nature Reserves (LNRs) across Edinburgh, with a total area of 2.21 km^2. Many of these LNRs are underpinned by Local Biodiversity Sites, so the total additional area of locally designated land is 0.46 km^2. The Council is

currently working on proposals to designate additional LNRs and will work with the Local Biodiversity Steering Group to review the current network of local designations to ensure they are compatible with the existing hierarchy of designations and the forthcoming Nature Network. This work is anticipated to be undertaken in 2026-7.

Local Nature Conservation Sites (LNCS)

The Local Nature Conservation Site (LNCS) network in Edinburgh comprises both Local Biodiversity Sites and Local Geodiversity Sites. These sites are protected through City Plan 2030. NatureScot updated the guidance on establishing and managing LNCS systems in 2023. This sets LNCS within the wider biodiversity and planning policy context and notes the contribution these sites can play to tackling the nature and climate crises and supporting the resilience and wellbeing of communities and ecosystems.

Local Biodiversity Sites are designated for their ecological value at a local level. The designation process and ongoing monitoring of sites is managed by The Wildlife Information Centre (TWIC) on behalf of the Council, with formal designation undertaken by the Local Biodiversity Sites Steering Group. Membership of this group includes City of Edinburgh Council, The Wildlife Information Centre, RSPB, Scottish Wildlife Trust Lothians Group and the Botanical Society of Britain and Ireland Vice County Recorder for Midlothian. The methodology for assessment has been developed by TWIC and is consistent with the methodology used across much of the Lothians. The boundaries are regularly monitored, and a review of all sites and identification of potential new sites will be undertaken in 2026. There are currently 93 Local Biodiversity Sites. The total area identified as a Local Biodiversity Site is 33.99 km^2, which makes up 12% of the council area.

The total area designated for biodiversity at a local level is 34.45 km^2, which makes up 13% of the total council area. These locally designated sites, plus national and international protected areas will form the core of the updated Edinburgh Nature Network, as discussed in Topic 5 Biodiversity.

There are a further 30 sites identified as Local Geodiversity Sites. These have been identified following a collaborative effort between the Edinburgh Geological Society, the Council and the GeoConservation UK and ensure that areas of geological value in the city are given appropriate recognition and policy protection. The Scottish Geology Trust manage two websites with all available information on geodiversity sites. The Geosites website includes information related to designated sites and allows volunteers to provide information on these sites to support ongoing monitoring. The GeoGuides website is a database of information and published articles about the geosites and other non-designated sites of geological interest.

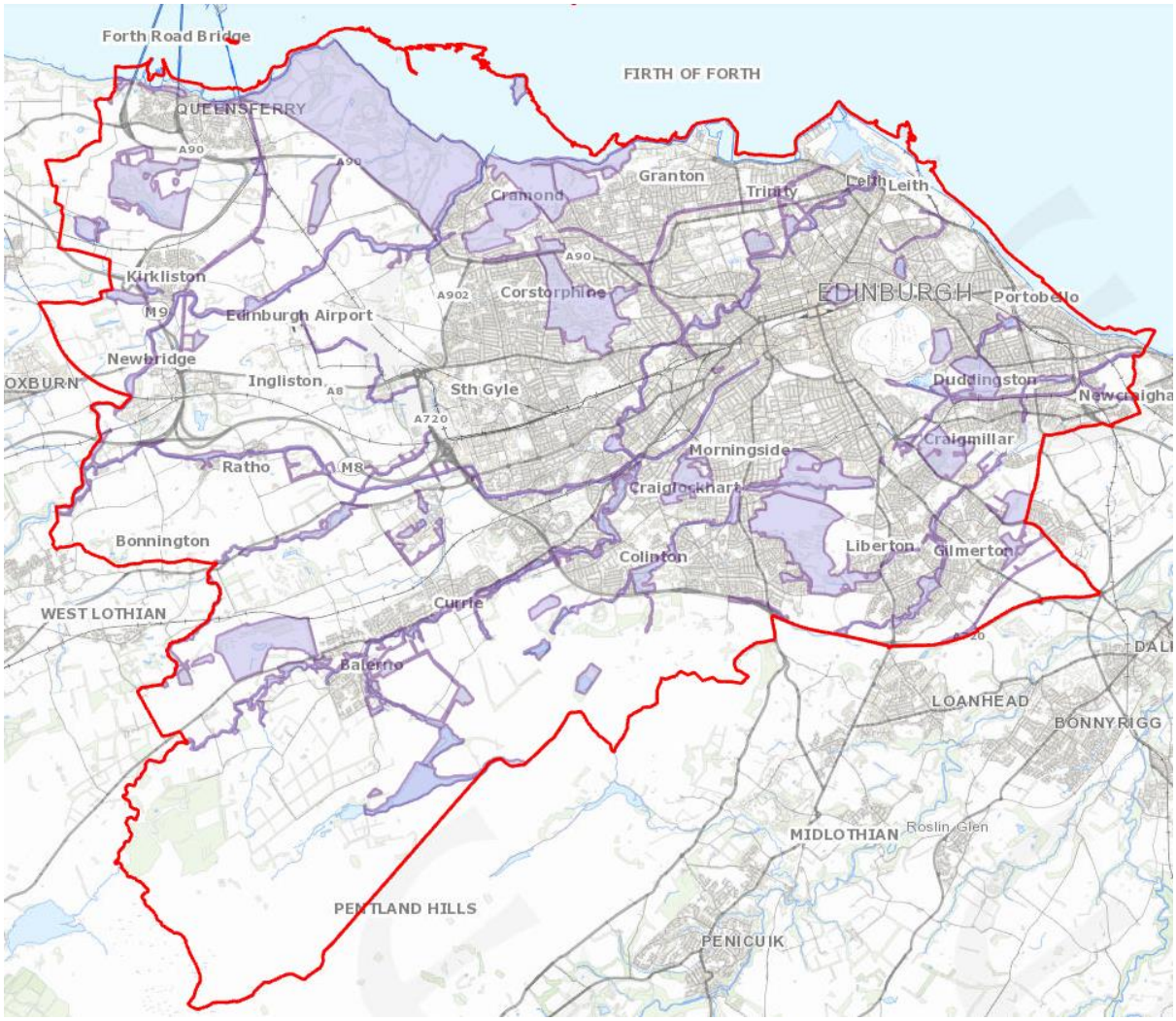


Figure 02.2: Local Biodiversity Sites within the City of Edinburgh Council area

Country Park

The Council's only Country Park is also within the Pentland Hills Regional Park at Bonaly. This type of designation supports recreation in the countryside and delivery of the Open Space Strategy as part of the wider offering of parks and open spaces as discussed in Topic Paper 06 Blue Green Infrastructure, Open Space and Recreation.

Local Landscape Areas

The European Landscape Convention (ELC), an international treaty dedicated to the protection, management and planning of all landscapes in Europe, has been signed and ratified by the UK Government. Its purpose is delivered through integration with national and local policies. NatureScot and Historic Environment Scotland have set out guidance for planning authorities on designating Local Landscape Areas as defined by NPF Policy 4d.

There are currently 22 Special Landscape Areas (SLAs) within the adopted local development plan and termed 'local landscape areas' (LLAs) in NPF4. The

designation protects Edinburgh's most distinctive local landscapes from development that would harm their integrity or valued qualities.

SLAs are accompanied by 'Statements of Importance' setting out their special qualities and reasons for designation. Existing SLAs include examples of the city's coastline, river valleys, designed landscapes, formal urban greenspaces, urban and rural hills and surrounding farmland.

Site number	Name
1	Southern Forth Coast
2	Lower Almond
3	Cammo
4	Dundas
5	Upper Almond
6	Gogar
7	Ratho Hills
8	Water of Leith - west
9	Pentlands
10	Corstorphine Hill
11	Craiglockhart
12	Water of Leith – New Town
13	Inverleith
14	Castle Rock
15	Princes Street Gardens
16	Calton Hill
17	Holyrood, Duddingston and Prestonfield
18	Craigmillar
19	The Drum
20	Edmonstone
21	Braids, Liberton and Mortonhall
22	Craigie Hill

Figure 02.3: List of the Special Landscape Areas within the adopted local development plan

The existing SLAs were identified in line with Scottish Natural Heritage and Historic Scotland's guidance (2006) to provide a consistent approach to local designation between the former rural west and city local development plan areas and published as candidates for designation in 2010. The SLAs were first designated by the Edinburgh Local Development Plan 2016 and re-affirmed by City Plan 2030, as the adopted local development plan in 2024.

NatureScot and HES refreshed their guidance on LLAs in 2020, stating that 'authorities should consider the function and continuing relevance of LLAs when preparing their development plan.' Alongside the Council's update to its local Landscape Character Assessment and Green Belt Review (as set out in Topic Paper Green Belt, countryside and rural), a report has been prepared to ensure Edinburgh's LLAs remain valid in terms of their designation criteria and boundaries.

The Review of Local Landscape Designations 2026 captures:

- changes to local landscape areas on the ground and
- ensures alignment with NatureScot and HES's current guidance.

The Review prepared by LUC, involved field and desk study to assess existing SLAs against criteria consistent with national guidance, including: distinctiveness, rarity and sense of place, scenic qualities, enjoyment, culture and naturalness.

The majority of existing SLAs were found to meet the current threshold for designation as LLAs with the exception of Edmonstone, owing to developments within its boundary. However, the Edmonstone ridge and woodland remain protected by a TPO and part of the green belt.

A number of boundary modifications were put forward for consideration at Dundas, Craiglockhart, Gogar, Ratho Hills, Calton Hill, and Pentland Hills LLAs to reflect land use change since 2010.

Updated Statements of Importance have been drafted for each future LLA, outlining their landscape qualities, pressures on their integrity, condition and enhancement potential.

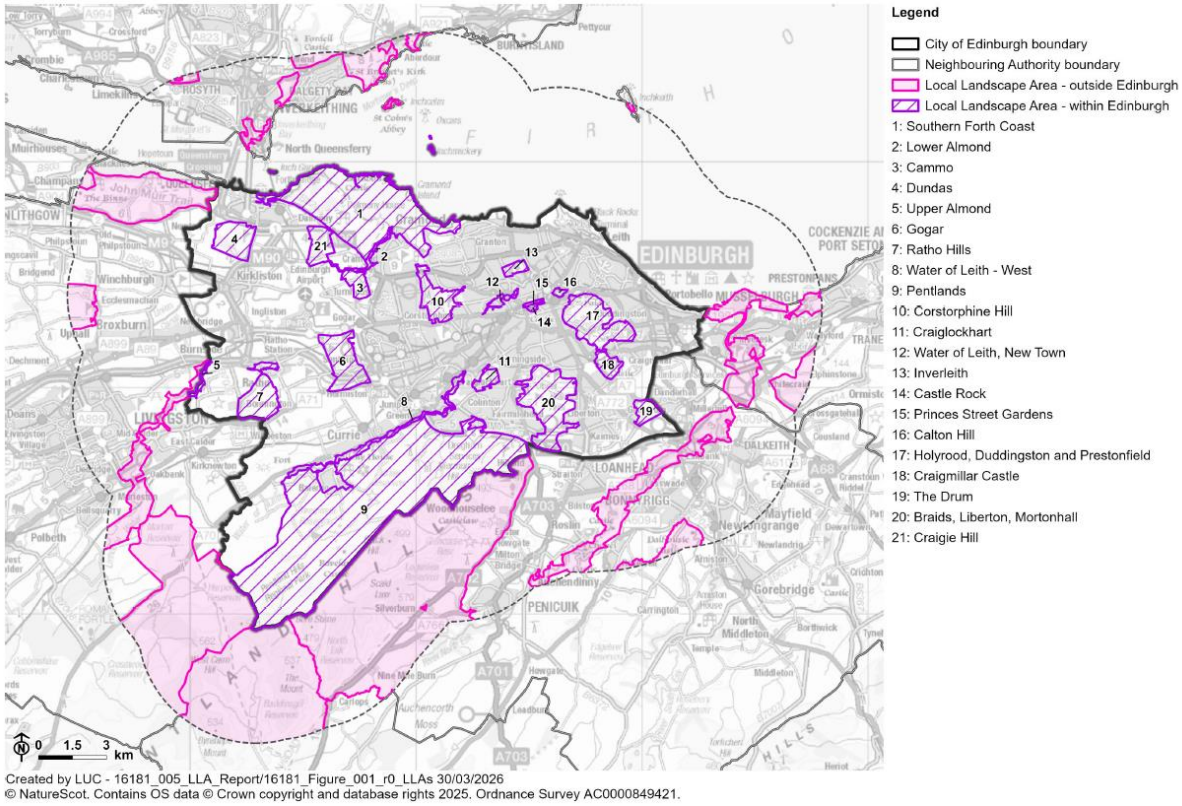


Figure 02.4: Map showing Local Landscape Areas meeting with criteria for designation (source: Review of Local Landscape Designations, 2026)

Non-designated landscapes and landscape features

Within the Council's area, there are local landscapes and landscape features which are not recognised as LLAs or protected by designations such as the green belt and countryside policy areas, world heritage sites, conservation areas, the setting of listed buildings or scheduled monuments, regional park, open space or nature conservation designations.

These features make an important contribution to creating liveable and locally distinctive, successful places through landscape design, and can inform the siting and design of development in terms of its fit with the local landscape or townscape, and the connectivity of natural features.

The City of Edinburgh Council Landscape Character Assessment 2026 (ELCA) is a baseline statement of the local landscape characteristics of the council area to inform site specific Landscape and Visual Impact Assessment/Appraisal or other site analysis conducted as part of the planning application process. The ELCA complements NatureScot's national landscape character data, providing more detailed information on landscapes within the council area.

The ELCA was first published in 2010 and has been fully reviewed in 2026 to inform preparation of City Plan 2040. Landscape character is the distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another.

The ELCA 2026 has resulted in some updates to the landscape classification, character area boundaries, key characteristics, key sensitivities and valued features, current condition and forces for change.

It identifies 13 Landscape Character Types (LCTs) sharing broad landscape characteristics across the council area e.g. a prominent urban hill and 66 individual Landscape Character Areas (LCAs) as the distinct geographic examples of an LCT e.g. Calton Hill.

As per the Scottish Government's Local Development Planning Guidance, the Council considers local Landscape Character Assessment to be information relevant to inform its Green Belt Review in line with NPF4 policy (Topic Paper Green Belt, countryside and rural) and has informed its Local Landscape Designation review. The updated landscape baseline will also help to inform Strategic Environmental Assessment of the Proposed Plan.

Based on the ELCA, a related Landscape Sensitivity Assessment (LSA) for renewable energy development has been undertaken to inform Topic Paper Energy, Heating and Cooling Energy, heating and cooling. This appraises the landscape sensitivity of landscapes in the Council area to different types and scales renewable energy development.

Records of non-designated historic environment assets, including the Edinburgh Survey of Gardens and Designed Landscapes, are considered under Topic 10: Historic Assets and Places.

Open Space Audit and Strategy

The City of Edinburgh has 135 public parks and gardens, as identified in the 2016 Open Space Audit in addition to other amenity greenspace, green corridors, sports areas, natural/semi-natural greenspace, allotments and cemeteries. These spaces provide formal and informal play, recreation and leisure opportunities as discussed in more detail in Topic 06 Green blue infrastructure, open space and recreation. The audit also has relevance to Natural Places as it includes scores for habitat thus also recognising the important role these spaces can play supporting biodiversity and contributing to the Green Blue Network and Edinburgh Nature Network.

The Open Space Strategy 2021 built on this audit, identifying potential enhancement opportunities within parks and other open spaces and setting out the role they can play in supporting biodiversity, natural places and blue green infrastructure policies. The Strategy is currently being revised and could also play a role in identifying gaps where future enhancements could be directed or new green spaces created or protected to support connectivity between protected areas and non-designated assets through the Nature Network.

Environmental Assessment

The Council is required to assess the likely impacts of the plan on the environment, through the Strategic Environmental Assessment (SEA) process, to identify, describe evaluate the likely significant and cumulative effects of policies and proposals within the Proposed Plan. SEA Topics include biodiversity, flora and fauna, landscape and soils. There is strong alignment between biodiversity, natural places and green blue infrastructure objectives, recognising the important ecosystem services that the natural environment plays such as surface water management and strengthening resilience to flood risk.

The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) (the Habitats Regulations) require all competent authorities to consider whether a plan could affect a European site before it can be authorised. A Habitats Regulations Appraisal (HRA) and 'appropriate assessment' of the Proposed Plan will also be prepared in accordance with guidance set out by NatureScot. Further discussion on this is included in implications for the Proposed Plan below.

Forestry and Woodland

The Council recognises that trees are integral part of the city, contributing economic, social and environmental benefits. Trees play a major role in supporting green and blue infrastructure, health and wellbeing and climate adaptation, contributing to surface water management, carbon capture and combating the urban heat island effect. This is discussed in more detail in Topic 08 and 09 Climate change and climate mitigation, particularly noting the role trees play in terms of carbon sequestration. Tree planting in riparian corridors also has indirect benefits for the marine environment, supporting species that may use terrestrial environments as part of their life cycle.

The most recent i-Tree survey of the city, updated in 2017, found that Edinburgh has a 17% urban tree cover, with an average urban tree density of 62 trees per hectare. Many of these trees are found in parks and residential areas, with the Council actively working to plant more trees to improve air quality, create habitats for wildlife and crucially meet the challenges of climate change.

National

Forest and Land Management (Scotland) Act 2018

The Forest and Land Management (Scotland) Act 2018 is the principal legislation for forestry in Scotland. This legislation promotes sustainable forest management.

Scotland's Forestry Strategy 2019 – 2029

The national forestry strategy sets the ambitious target to increase forest cover from 17% to 21% of the total area of Scotland by 2032, supporting delivery of economic, environmental and social benefits. This recognises that trees and woodland need to be integrated into other land uses beyond forestry, providing a resilient resource with

greater natural capital than supports a strong economy, healthy environment and improves wellbeing. The Proposed Plan will explore how to retain and enhance existing woodland and promote new planting.

UK Forestry Standard

The UK Forestry Standard includes guidance on key aspects of sustainable forest management, including on topics such as climate change, biodiversity, historic environment, landscape and people. It applies to all aspects of forest management including trees, open areas, and water bodies and applies to all woodlands, regardless of who owns them.

The most recent edition was published in 2023 and provides a basis for regulation and monitoring, sets outs requirements and guidelines and aligns with policies, standards and conventions across different policy areas to ensure consistency in application within the forestry sector.

Control of Woodland Removal Policy

The Scottish Government's Control of Woodland Removal Policy provides a strategic framework for appropriate woodland removal, supporting the maintenance and expansion of forest cover in Scotland. This policy states that removal of woodland should only be permitted where it results in significant public benefits, and in many cases is accompanied by compensatory planting. There is further a strong presumption against woodland removal where it would lead to fragmentation or disconnection of habitat networks. The Policy includes the following guiding principles:

- There is a strong presumption in favour of protecting Scotland's woodland resources
- Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits. In appropriate cases a proposal for compensatory planting may form part of this balance
- Approval for woodland removal should be conditional on the undertaking of actions to ensure full delivery of the defined additional public benefits
- Planning conditions and agreements are used to mitigate the environmental impacts arising from development and Forestry Commission Scotland [now Scottish Forestry] will also encourage their application to development-related woodland removal
- Where felling is permitted but woodland removal is not supported, conditions conducive to woodland regeneration should be maintained through adherence to good forestry practice as defined in the UK Forestry Standard.

The Proposed Plan and associated guidance could provide greater clarity on compensatory planting in line with this policy. It could further incorporate current opportunities to align with the principles outlined in this policy.

Regional

Edinburgh and Lothians Tree and Woodland Strategy 2012

The Strategy provides a spatial framework to optimise the contribution of woodland to people, the economy and the environment across Edinburgh and the Lothians. The strategy aims to increase woodland cover across Edinburgh and the Lothians from 13% to between 17% and 19% of the total land area. It does not provide detailed guidance on site-specific sensitivities or the suitability of individual proposals, rather breaking down the region into landscape character areas and providing recommendations for each character type.

Local

Edinburgh Forest and Woodland Strategy

The Council is currently preparing the Forest and Woodland Strategy, adapting the policies previously identified in the Edinburgh & Lothians Tree and Woodland Strategy 2017 to the local level and with consideration to the updated information which will be provided by the habitat baseline survey and the i-Tree survey. Survey work has been undertaken in 2025 and it is anticipated that full analysis of these datasets will be available by Spring 2026.

The Forest and Woodland Strategy will be produced to inform the Proposed Plan with a target date of Autumn 2026 for a draft strategy. This will identify woodlands of high nature conservation value and set the spatial strategy to guide woodland protection, enhancement, and identify preferred places for woodland creation. Preparation of the strategy will be in accordance with Scottish Forestry's Technical Note on preparing forest and woodland strategies. This guidance sets the policy and legislative context for forestry and woodland strategies, defines woodlands of 'high nature conservation value' and provides general notes on how to prepare a strategy.

The Forest and Woodland Strategy will be informed by the following datasets:

- Ancient Woodland Inventory
- Native Woodland Survey of Scotland
- City of Edinburgh Council Habitat Mapping
- CSGN Habitat Connectivity Maps
- Tree Preservation Orders
- Conservation Areas
- i-Tree Data.

The Native Woodland Survey of Scotland (NWSS) and Ancient Woodland Inventory in particular are useful datasets to help inform woodland protection, enhancement and expansion. The NWSS is an inventory of the location, type, condition, and extent of native woodland in Scotland that was launched in 2014. Areas of Ancient Woodland can be found mainly to the west of the council area, such as Corstorphine

Hill, Dalmeny Estate and along the Water of Leith. Some of these areas of woodland are afforded protection through designation for biodiversity, landscape or amenity value.

The Forest and Woodland Strategy forms an important part of the evidence base for the Proposed Plan. It will also guide the development, expansion and management of trees, woodlands and forests within Edinburgh, thus supporting a number of Council aims as set out in strategies and plans such as the Climate Ready Edinburgh Plan, and support delivery of council projects including the Million Tree City project.

The objectives of the project are to:

- Review the existing Forest and Woodland in the context of recent changes to national and local policy.
- Prepare a draft Forest and Woodland Strategy, setting out a clear vision for woodlands within Edinburgh.
- Identify robust policies to support decision making and prioritisation of tree planting to deliver economic, environmental and social benefits.
- Set out a clear spatial strategy to support woodland planting initiatives and inform the design of proposals.

The drafting of this strategy will be led by the Planning service, working with internal and including Parks and Openspace, Transport, Structures and Flood Prevention, and Climate and Nature services, and external partners through the Adaptation and Nature and Edinburgh Biodiversity Partnerships. It is envisaged that this strategy will underpin the Million Tree City project, highlight the optimum areas for tree planting projects and support the Edinburgh Nature Network.

I-Tree Survey

An i-tree survey was undertaken of the urban trees in Edinburgh to understand the value they provide. The initial survey was undertaken in 2011, and an update provided in 2017. The most common species were found to be Sycamore, Holly and Silver Birch, and approximately 2% of trees were on development land.

This survey was undertaken again in 2025, with survey work undertaken by Forest Research. Outputs and analysis from this work is expected in Spring 2026 and will be used to inform the Proposed Plan and the updated Forest and Woodland Strategy. This will provide an updated baseline of current canopy cover, to support and guide the delivery of tree canopy cover targets and wider tree planting initiatives.

Tree Preservation Orders

Trees provide a number of vital ecosystem services and make an important contribution to the city's landscape, heritage and biodiversity. Trees in the city can be protected through Tree Preservation Orders (TPO) and conservation area

designation. There are currently 212 TPOs in the city, as shown in Figure 02A.A further 50 conservation areas provide protection to trees located within those areas. The Proposed Plan will recognise the higher value placed on trees protected by TPO and in conservation areas and will explore how better to connect these areas to support green blue and Nature Networks.

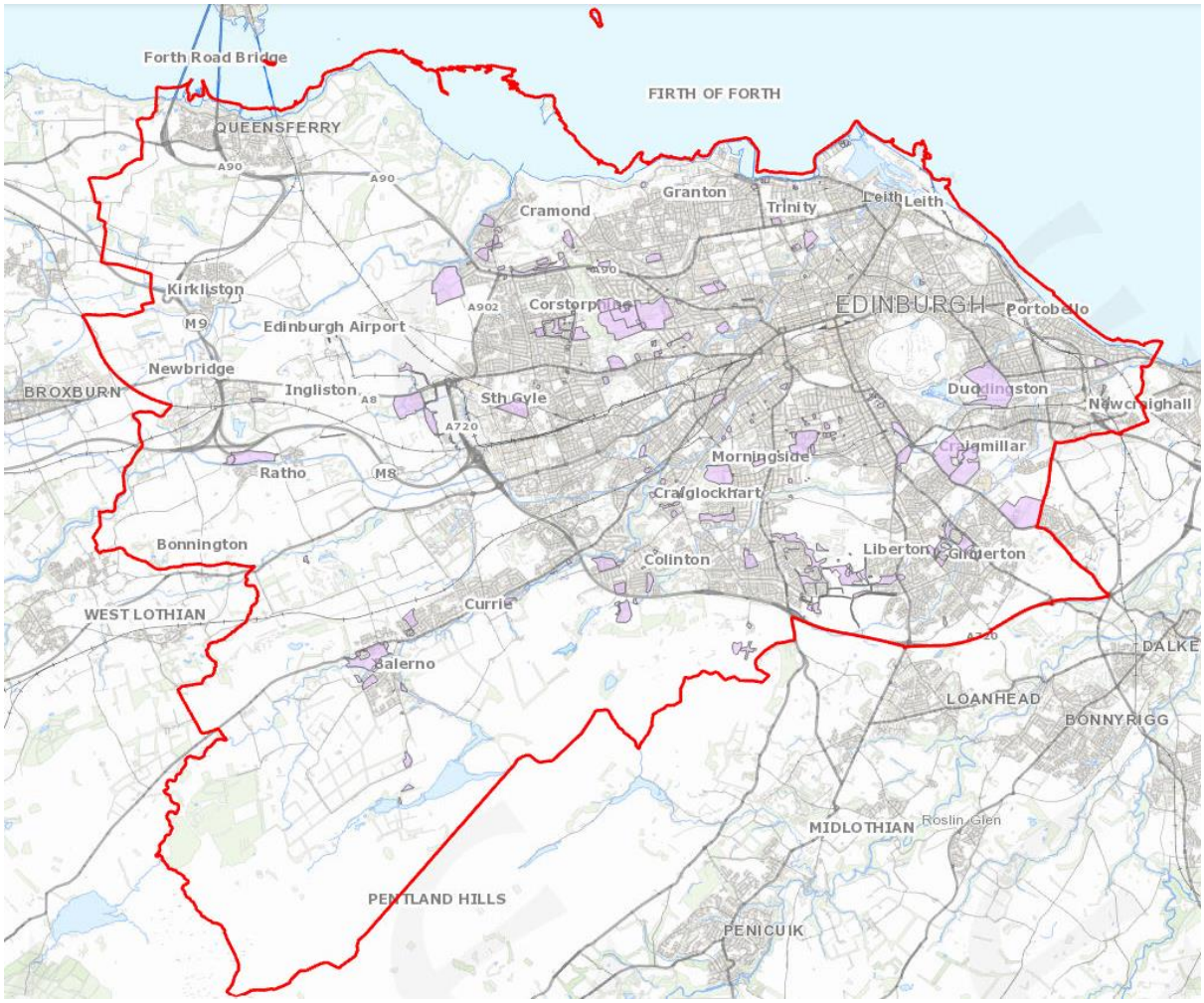


Figure 02.5: Tree Preservation Orders (October 2025)

Tree Canopy Cover Targets

To achieve climate adaptation, biodiversity and placemaking benefits, particularly in the urban environment, development should maximise the opportunity to plant new trees and woodland. Through local policy and guidance notably City Plan 2030 policy Env 27 Public Realm, New Planting and Landscape Design and the Edinburgh Design Guidance, planting proposals are expected to expand tree canopy cover on site, including retaining existing tree cover.

The Council is targeting 20% tree canopy cover for all residential proposals (excluding householders and Gypsy/Travellers sites or yards) and residential/commercial led mixed-use development. This will be judged on a site-by-site basis, and will reflect the individual scale, context and opportunities of the site.

A higher canopy cover of 30% could be targeted where development is located on a large site incorporating large open space in a strategic location for the city's green-blue network. Where development is within a dense, urban environment with a tight urban grain, a lower canopy cover of 10% could be acceptable.

These canopy cover targets support Council targets around street trees and delivery of the Million Tree City in very urban areas where opportunities for larger contiguous woodland may be limited. Opportunity areas for these larger woodland sites and consideration for woodland planting over larger areas will be identified within the forthcoming Forest and Woodland Strategy. The initial set of canopy cover targets will be monitored to evaluate benefits achieved in terms of securing an enhanced urban tree canopy and adjusted as required. Tree canopy targets will not, in many cases, be sufficient to fully satisfy requirements for biodiversity enhancement and should be used in addition to recognised metrics.

One Million Tree City

At a local level, Edinburgh has a target to be a million-tree city by 2030 as part of its commitment to be net zero given the role of trees in carbon sequestration. There are approximately 750,000 trees in the Council area. To become a one million tree city, the city needs to plant an estimated 250,000 trees taking account of natural losses and selective felling. Alongside community projects and management of the Council's greenspaces and streetscape, the planning system can support this objective by making provision for the preservation and planting of trees as part of the consenting process.

City of Edinburgh Council Trees in the City

The Trees in the City Strategy provides a framework setting out how the Council's Forestry Service operates when managing and maintaining trees across the city. Whilst predominantly focusing on the Council's responsibilities with regards trees in its ownership, the Strategy does provide some useful information on tree pests and sets out the Council's current approach to tree planting using both native and non-native species that is of relevance to private land managers and development sites. In particular, the Strategy highlights the biosecurity risks associated with trade in plant materials and therefore the need to utilise reputable growers to protect trees not only at a site level, but across the city as a whole. This is therefore an important consideration when securing increased canopy cover through development.

City of Edinburgh Council Ash Dieback Action Plan

Ash Dieback, alongside other pests and diseases, is a key pressure on woodland and tree cover. Whilst not all pests and diseases are the result of a changing climate, this has increased the severity of effect in some cases. Changing weather patterns including milder, wetter winters is thought to have contributed to the acceleration of Ash Dieback across the country. The Council has an Ash Dieback Action Plan, which sets out in more detail what the risks from ash dieback are to the city. Ash is a significant component of Edinburgh's urban forest, with 10-15% of the Council's

millennium woodland planting thought to be Ash. The wholescale loss of this species will therefore affect the resilience and connectivity of the urban forest, the contribution woodland plays to the Edinburgh Nature Network, and the success of tree canopy targets. The Council continues to develop an Ash tree recovery plan to mitigate biodiversity, landscape and other environmental losses, as well as a replacement planting programme delivered under the Million Tree City planting programme. This includes species diversification to promote resilience and go some way to mitigate the loss of this species on biodiversity.

Tree Equity Score

Tree equity aims to ensure all communities have full and fair access to the benefits of trees and woodlands. Targeting those areas with a low tree equity score can help increase biodiversity, health and wellbeing, climate resilience and reduce social inequalities. The Woodland Trust's Tree Equity Score tool can help identify those neighbourhoods where an increase in tree canopy can deliver the most socio-economic and environmental benefits. Analysis has been undertaken for the City of Edinburgh Council area by Woodland Trust Scotland which assessed 588 neighbourhoods across the city, with the exception of Kirkliston, Newbridge, Ratho Station and Ratho. Eighty-three neighbourhoods were found to have a Tree Equity Score less than 80, as shown in Figure 02B below. These areas could benefit from increased tree planting through new development. The Tree Equity Score will be a key tool in the forthcoming Forest and Woodland Strategy to direct tree planting to areas of most need, with consideration given to other constraints including natural and cultural heritage designations.

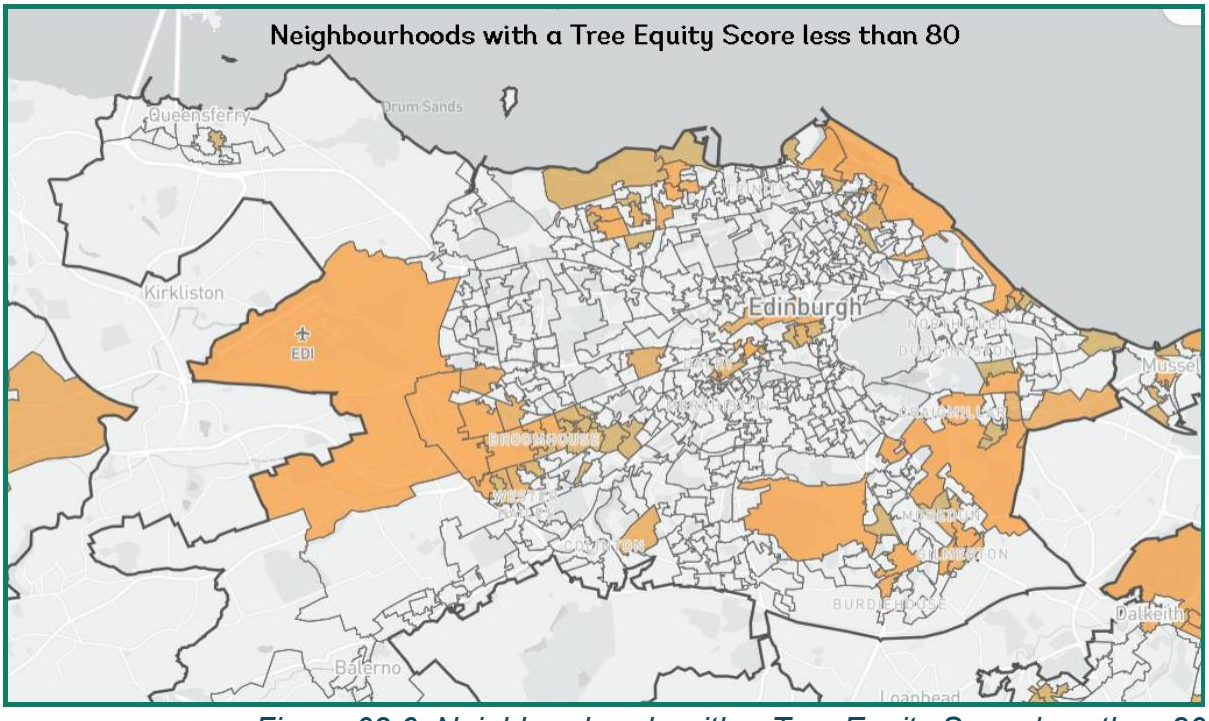


Figure 02.6: Neighbourhoods with a Tree Equity Score less than 80

Soils

NPF4 Policy 5 highlights the importance of protecting carbon-rich soils, restoring peatlands and minimising disturbance to soils during development. The Scottish Soil Framework further recognises the importance of soils for sustaining biodiversity and underpinning the basis for food and forestry production. The Council signed Scotland's Geodiversity Charter in 2025, recognising the vital role that geodiversity plays in providing the foundation for our biodiversity and landscape, providing construction materials and minerals and underpinning a range of ecosystem services and nature-based solutions such as flood regulation and water quality.

The UK Soil Observatory is a large depository of soil data, and includes data on soil parent material, soil biodiversity and other soil properties. Edinburgh is predominantly Glacial Till, with Quaternary Marine/Estuarine Sand along the coastline. Glacial Till is a heterogeneous mixture of clay, silt, sand and gravel – the higher clay content can result in poor drainage conditions.

Peatland and/or peaty soils are found predominantly in the southwest of the Council area, in the Pentland Hills, as identified in the Carbon and Peatland 2016 Map. Peatland management and restoration is a cross-cutting issue, supporting carbon sequestration, flood management and biodiversity. Evidence related to this matter, and the important role peat soils have for carbon sequestration, are detailed in Topic 08 and 09 Climate change and climate mitigation. There is increasing recognition of the role soils play in carbon storage and sequestration. Restoration of this habitat can therefore help increase carbon sequestration potential and also support the species associated with this important habitat, contributing to both green blue and nature networks.

Sustainable management of soil on development sites is an important part of safeguarding our geodiversity resource, and the Council encourages developers to minimise the disturbance and damage to soils wherever possible. This includes developing site layouts and foundation designs that reduce the amount of excavation required, including landscaping that retains excavated material to reduce waste, and protecting soil health through correct storage and handling in accordance with British Standard 3882 for topsoil and British Standard 3882 for subsoil.

For all soil types, a method statement and/or management plan for soil is required where impacts on soil cannot be avoided, with more detailed site-specific information required to be submitted with an application where peatland or carbon-rich soils may be impacted. This approach was introduced in the Edinburgh Design Guidance (adopted 2025) and would be expected to continue to be a consideration for the Proposed Plan.

Land Capability for Agriculture

Land capability for agriculture provides information on the type of crops that can be grown in any given area, based on environmental and soil characteristics. Classification ranges from Class 1 (land capable of producing a very wide range of

crops) to Class 7 (land of limited agricultural value) and Urban. Prime Agricultural Land is defined as being Class 1, Class 2 or Class 3.1.

Much of the city is classified as urban with no agricultural value. The west of the Council area, outside the urban area, has been identified as predominantly Class 2 agricultural land in the Land Capability for Agriculture (Partial Cover) map. There are also small pockets of Class 1 and Class 3.1 land of prime agricultural value. There is a presumption against development on prime agricultural land, with the limited circumstances when development on this land will be acceptable set out in NPF4 Policy 5 Soils. The Proposed Plan will consider the continued protection of these areas where they are undeveloped or unallocated to preserve the resource. Proposals to allocate other areas of Prime Agricultural Land would be considered against the criteria set out in NPF4 Policy 5.

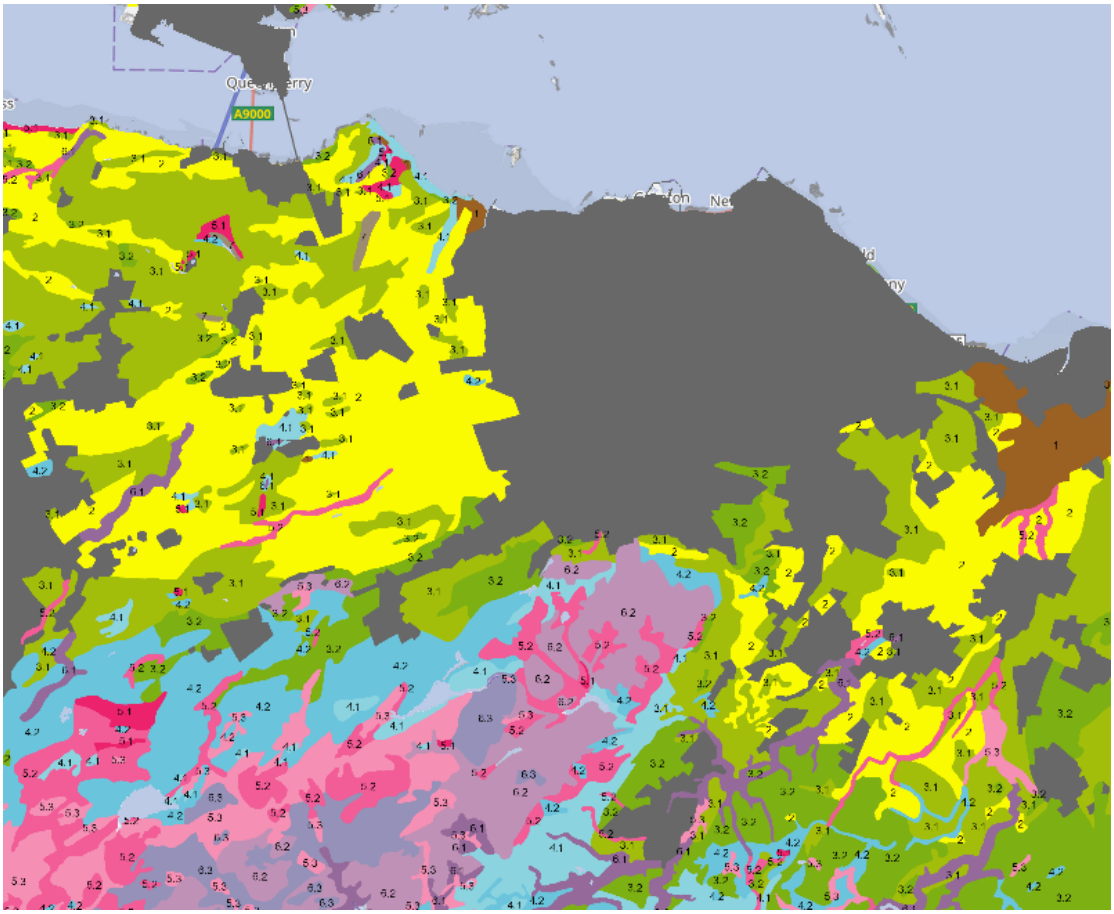


Figure 02.6: Land Capability for Agriculture across the City of Edinburgh Council

Figure 02.6: Key

Summary of stakeholder engagement

Key Agency	**NatureScot**
Main views raised	• **Scoping (May 2025):** NatureScot commented that landscape character assessment should be considered to understand sensitivities to development. NatureScot further provided recommendations on suitable evidence sources including Open Space Strategy, and Scotland's Forestry Strategy. • **Draft Topic Papers (Nov 2025):** Meeting held with NatureScot to outline the scope of the Landscape Character Assessment and Green Belt Review, alongside related studies. • **Final Topic Papers (March 2026):** NatureScot noted that its previous comments have been addressed, whilst highlighting additional points to consider including: - making reference to the Council's approach to Ash Dieback management and the implications for

	resilience of nature networks, habitat connectivity and tree canopy cover targets - adding a statement to set out the impact evidence on ecosystem services and carbon sequestration functions of soils has on policy direction in the Proposed Plan.
Council response and implications for the proposed plan	The Council has undertaken an update to its Landscape Character Assessment and a Green Belt Review. This will help to inform the spatial strategy, the Strategic Environmental Assessment (SEA) and site appraisal process. Additional sources of evidence have been added, with greater discussion around soils and the contribution they make to ecosystem services and carbon sequestration and reference to the ash dieback.
Is the agency content with the evidence?	NatureScot does not dispute any of the evidence set out in the topic paper. They have advised: 'We welcome the further information and the iterations that have been made to the evidence reports. As a result we are happy to offer our support on sufficiency of evidence work. The meetings we have had on specific issues were useful. And overall, from our perspective, the evidence papers represent a very strong body of work in preparation for the next stages of the process.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with NatureScot will take place in developing the Proposed Plan. NatureScot will be consulted on the Appropriate Assessment of the Proposed Plan.

Key Agency	**Scottish Forestry**
Main views raised	• **Draft Topic Papers (Nov 2025):** - the need to reproduce the Control of Woodland Policy tests to strengthen retention of existing woodland and the role of the proposed plan in operationalising these tests in development management

	- the role of the Forest and Woodland Strategy in targeting woodland creation and - the need for buffers around ancient woodland to avoid edge effects.
Council response and Implications for the proposed plan	The topic paper has been amended to incorporate points as recommended.
Is the agency content with the evidence?	Scottish Forestry were contacted on multiple occasions to follow up on the comments provided on the draft topic papers with no response received. In the absence of further comments, it is assumed that Scottish Forestry are content with the evidence.
Areas of agreement	Assumed agreement with matters raised in previous comments having been addressed.
Outstanding issues	None.
Actions for proposed plan stage	Scottish Forestry will continue to be consulted as during preparation of the Forestry and Woodland Strategy. It is anticipated that ongoing engagement with Scottish Forestry will also take place in developing the Proposed Plan.

Key Agency	**Scottish Water**
Main views raised	• **Draft Topic Papers (Nov 2025):** Scottish Water noted that the paper would benefit from more explicit links to the valuable function natural places play in water management.
Council response and Implications for the proposed plan	Greater cross-referencing of topic papers has been undertaken.
Is the agency content with the evidence?	Scottish Water does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	There will be ongoing engagement with Scottish Water in developing the Proposed Plan.

Key Agency	**Marine Directorate**
Main views raised	• **Draft Topic Papers (Nov 2025):** Marine Directorate asked for more cross-referencing to National Marine Plan and wider biodiversity issues that could have inter-connections on marine and terrestrial environments.
Council response and Implications for the proposed plan	Greater cross-referencing of topic papers has been undertaken.
Is the agency content with the evidence?	Previous comments have been taken into account.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with Marine Directorate will take place in developing the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** HFS recommended additional references, as follows: - Four sources of information were recommended relating to house building and the housing emergency, including letters from the Cabinet Secretary for Housing (September and October 2025) and two reports by Homes for Scotland on the challenges facing homebuilders and housing delivery. - Five additional sources of information were recommended on specific biodiversity topics including guidance from NatureScot on the use of metrics and data on plant, bird and invasive species distribution. Issues were raised around the benefits of housebuilding and need to address the housing emergency: - National Planning Policy (NPF) 4 Policy 4 states development proposals that affect a Local Nature Conservation site will be supported where 'development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified'; or 'Any significant adverse effects on the integrity of the area are clearly outweighed by

	social, environmental or economic benefits of national importance'. Construction Environment Management Plans - Recommended the topic paper recognises that risks can be controlled through the preparation of a Construction Environment Management Plan, which allows the local authority a degree of control as they can use their enforcement powers should it not be implemented. Trees and Woodland - It is important that the presence of trees/ woodland on sites that are promoted for development do not preclude the site from being considered as suitable for being developed. The presence of trees and woodland can be incorporated into the design of any site layout to create 'place' and managed through a management plan thus contributing to green network objectives and climate change and flooding adaptions. - The Council should set out in guidance the level of compensatory planting that it would consider to be reasonable. - Housing proposals in settlements with high value woodland can deliver the Policy outcomes outlined in NPF4 Policy 6 by expanding woodland through tree planting and both protecting and managing woodland or trees through a suitable management plan. The latter could incorporate biodiversity enhancement measures which may not have otherwise been delivered. New residential development provides the ideal opportunity to improve tree canopy cover and to contribute to the One Million Tree City and Tree Equity Score targets. - HFS welcomes CEC's decision to update the i-Tree Survey and its use in the forthcoming proposed plan and the updated Forest and Woodland Strategy.
Council response and implications for the proposed plan	Suggested relevant evidence sources have been incorporated into the Biodiversity topic paper and implications for the Proposed Plan considered in that paper. Other comments made relating to biodiversity have also been addressed in that topic paper. Issues around policy interaction and need to address the housing emergency have been addressed in the Housing Land topic paper. Ecological Management Plans and Construction Environment Management Plans can be utilised to manage impacts on biodiversity during construction, and the Council actively requests these where required to manage impacts on biodiversity. Local development plans are however required

	to follow the mitigation hierarchy when allocating sites, thus avoiding impact on sites of biodiversity value wherever possible. Sites with greater biodiversity value, including protected areas and Local Biodiversity Sites will therefore have greater requirements to merit consideration as an allocation. Marketability and viability of development is discussed elsewhere in the Evidence Report. The Council notes that forestry and woodland is one consideration when determining site suitability, and consideration of all relevant policies will be required. The commitment of housebuilders to biodiversity and tree planting is welcome and the important contribution development sites can make to the One Million Tree City programme. The Council supports the incorporation of existing trees into site design where possible, as set out in the Edinburgh Design Guidance. The Council notes comments related to compensatory planting, which is in line with the Scottish Government's Control of Woodland Removal Policy. Guidance on compensatory planting is better addressed at future stages of the Proposed Plan, such as in updated supplementary guidance.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Ongoing engagement with Homes for Scotland will be undertaken in developing the Proposed Plan.

Other engagement and matters raised

Scoping (May 2025):
The British Geology Society provided a list of data sources for inclusion within the Evidence Report. For this paper, it recommended the BGS Soil parent Material Model and the Geodiversity Charter. This information has been included in the body of evidence, with data on soil accessed via the UK Soil Observatory.

Other:
To ensure a consistent approach to the review of the Edinburgh Landscape Character Assessment and Local Landscape Areas in line with NPF4, liaison and

data sharing has been undertaken with Midlothian, East Lothian, West Lothian and Scottish Borders Councils.

The Lothian and Borders GeoConservation Group was consulted as part of the drafting of this paper. It identified the importance of the Geosites and Geoguides websites as sources of information on geodiversity sites and features within the plan area. These sites have been incorporated into the Evidence Report.

Internal discussions and ongoing correspondence have been undertaken with the Thriving Greenspaces Team, Climate & Nature and Tree Team to identify relevant sources of information and data to inform the evidence base.

Summary of implications for the Proposed Plan

Local Nature Conservation Sites

Local Nature Conservation Sites are reviewed on a ten-yearly cycle, with up to five sites re-surveyed and their designation confirmed on an annual basis. The Proposed Plan will need to consider providing policy protection for proposed Local Nature Conservation Sites. NPF4 Policy 4d only covers sites designated for their nature or landscape value, whilst the Proposed Plan will need to consider the requirement for additional mechanisms to protect proposed Local Nature Conservation Sites to ensure locally important sites and natural features can be protected and enhanced whilst the process of assessment is ongoing.

Local Landscape Areas

The Proposed Plan will need to consider the ongoing role for Local Landscape Areas to protect Edinburgh's locally distinctive landscapes, where these meet current designation criteria, and the setting of boundaries which reflect their valued qualities and characteristics. The 2026 Review of Local Landscape Character Areas will feed into this.

Local Landscape Character

The Landscape Character Assessment does not have a direct implication for the Proposed Plan but sets a baseline for the Green Belt Review, Landscape Sensitivity Assessment and Environmental Report and can be used to inform consideration of future planning applications.

Habitats Regulations Appraisal

A Habitats Regulations Appraisal will be undertaken of the Proposed Plan, including the spatial strategy, proposals and policies, to consider whether it has a likely significant effect on any European Sites, either alone or in combination with other plans or projects. Where likely significant effects are identified, Appropriate Assessment will be undertaken of any implications for those sites' conservation objectives. This will be undertaken prior to adoption in accordance with NatureScot

guidance, and the Proposed Plan will therefore be influenced by the conclusions of the Habitats Regulations Appraisal.

Forestry, Trees and Woodland

The protection, management and replacement of existing trees and woodland will need to be integrated into the Proposed Plan, site allocations and associated place briefs and principles and potential policies. NPF4 Policy 6 provides strong protection for ancient woodland, veteran trees, and native woodlands and this could be strengthened with the application of a 15-20m minimum buffer around these sites, to align with best practice as set out in the UK Forestry Standard.

The woodland spatial strategy, once available through the updated Forest and Woodland Strategy, will need to be integrated into the spatial strategy of the Proposed Plan and the Nature Network ensuring that trees are adequately considered in site selection and integrated into place briefs and new development. Opportunities for planting to support tree canopy cover targets and positive effects for biodiversity should be maximised, with consideration given to tree equity to deliver socio-economic benefits.

Soils

The Proposed Plan will need to carefully consider the implications for prime agricultural land and carbon rich soils when identifying sites and other land use considerations. Site allocations will need to be undertaken in accordance with NPF4 Policy 5 to potentially avoid or minimise the loss of Prime Agricultural Land wherever possible. The Proposed Plan could also explore requirements for development proposals to be supported by a soil management plan.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

03: Green belt, countryside and rural

Topic	**03: Green belt, countryside and rural**
Description of topic	Information to guide if and where green belt, countryside or rural policy boundaries are defined by the Proposed Plan.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5) - sets out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used.
Relevant NPF4 Policies	• Policy 2 Climate mitigation and adaptation • Policy 3 Biodiversity • Policy 8 Green belts • Policy 17 Rural homes • Policy 29 Rural development
Local Development Plan Guidance	Green belts (page 113) states that Local Development Plans (LDPs) should consider using green belts to support their spatial strategy to restrict development around towns and cities, where there is a risk of unsuitable growth in car-based commuting or suburbanisation of the countryside. Existing green belts should be reviewed when LDPs are prepared, and boundary changes may be made to accommodate planned growth or extend the area covered as green belt. Green belt contributes to the following NPF4 policy outcomes: • Development is directed to the right locations, urban density is increased and unsustainable growth is prevented. • The character, landscape, natural setting and identity of settlements is protected and enhanced. • Nature networks are supported and land is managed to help tackle climate change. Additionally, green belts may support the spatial strategy by protecting, enhancing and providing access to multifunctional blue and green networks and open space. There are tighter restrictions on acceptable uses under green belt policy than for rural areas and both designations should be shown separately on the proposals map and not overlain.

	Planning authorities may wish to review their Local Landscape Character Assessment to inform green belt review in accordance with NPF4, including consideration of their boundaries based on clearly identifiable visual boundary markers.
Linked Topic Papers	• Topic 02 Natural places • Topic 03 Biodiversity • Topic 04 Water management, flood risk and coastal development • Topic 06 Green blue infrastructure, open space and recreation • Topic 08 and 09 Climate change and climate mitigation • Topic 10 Historic assets and places • Place Profiles
List of and links to evidence	• **CD532** City of Edinburgh Green Belt Review 2026 – Landscape Setting and Identity, LUC, March 2026 • **CD534** City of Edinburgh Council Review of Local Landscape Designations, LUC, February 2026 • **CD533** City of Edinburgh Council Landscape Character Assessment 2026, LUC, February 2026 • **CD577** Scottish Landscape Character Types Map and Descriptions, NatureScot, 2019 • **CD206** Scottish Government Urban Rural Classification 2020, Scottish Government, May 2022 • **CD100** National Planning Framework 4, Scottish Government, February 2023

List of matters covered

This topic paper considers the following in relation to:

- Background to the Edinburgh Green Belt and Countryside Policy Area
- The City of Edinburgh Landscape and Green Belt Reviews 2026

Summary of evidence

Background to the Edinburgh Green Belt and Countryside Policy Area

The Edinburgh Green Belt

The Edinburgh Green Belt has been a long-standing designation to manage the growth of the city and protect its landscape setting since 1957 with successive development plans maintaining its overall form alongside planned releases.

The last major review of the Edinburgh Green Belt was carried out in 2008, on behalf of the SESplan local authorities which share the Edinburgh Green Belt: the City of Edinburgh Council, Midlothian Council and East Lothian Council. As part of the work in preparing the Evidence Report an updated green belt review has been undertaken for the City of Edinburgh Council.

In recent decades, land has been removed from the green belt to accommodate growth. This includes land at Little France for The Edinburgh Royal Infirmary and BioQuarter, Edinburgh Airport and Heriot Watt University as non-conforming uses and also for housing led development in the Edinburgh Local Development Plan (2016).

In line with NPF4, City Plan 2030 continues to maintain a green belt, to support Edinburgh's spatial strategy.

City Plan 2030's focus on compact urban growth, the re-use of brownfield land, local living and sustainable travel has resulted in less substantive change to the green belt, however development pressure remains.

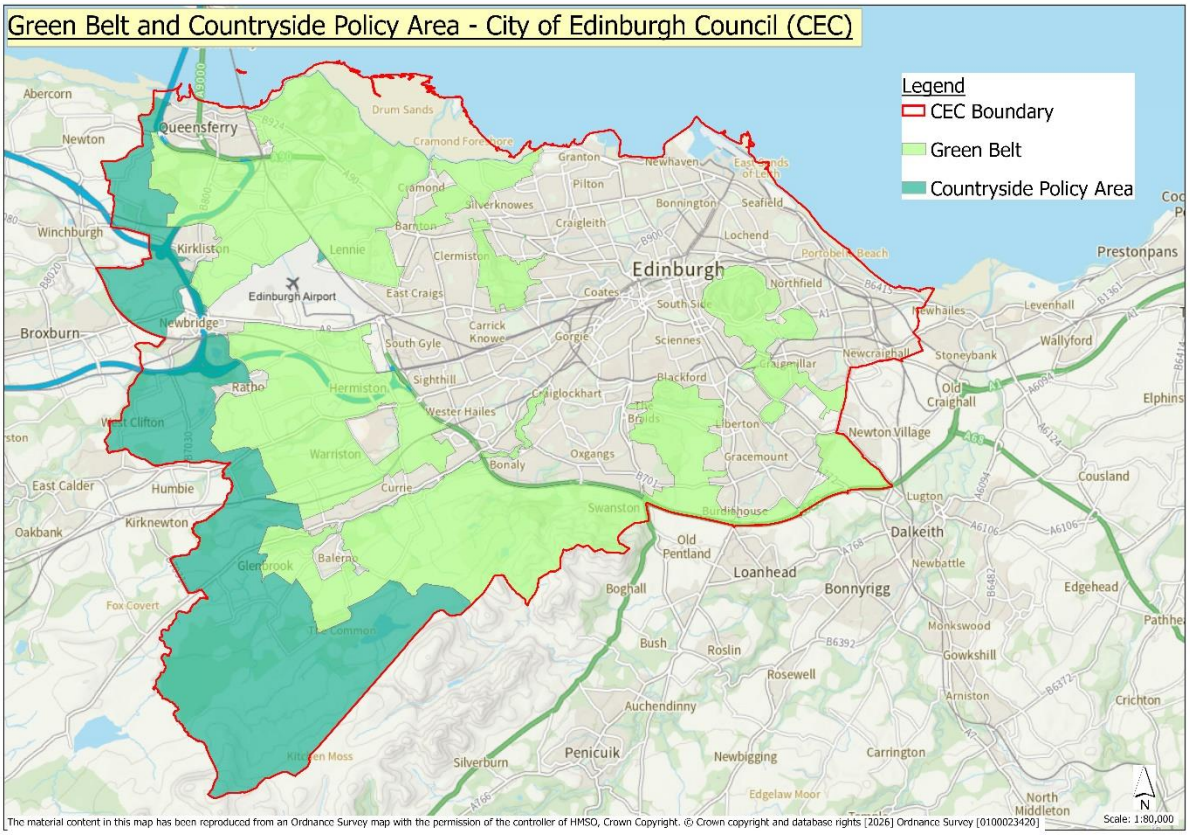


Figure 03.1: Existing Green Belt and Countryside Policy Area designations (source: City Plan 2030)

Countryside Policy Area

In the council area, City Plan 2030 also designates land as Countryside Policy Area, a designation similar to green belt policy in terms of the value of its rural character and views but lying to the south and west of the main settlements of Queensferry, Kirkliston, Ratho and Balerno.

The Countryside Policy Area designation extends to Edinburgh's boundary with West Lothian along the coast of the Firth of Forth and farmed lowlands and also encompasses part of the Pentland Hills, where it adjoins the council areas of West Lothian, Midlothian and Scottish Borders. The proximity of parts of the Countryside

Policy Area to the city and its surrounding settlements, however, can mean it is under pressure for development.

Rural

In terms of the Scottish Government's 6-fold Urban Rural Classification, outwith the Council's urban area, the surrounding countryside is defined as 'Accessible Rural' i.e. within a 30 minute drive from the centre of a settlement with a population of 10,000 or more. There are no areas classified as 'Remote Rural'.

The area does not include any uninhabited rural areas that would benefit from resettlement, or any rural areas with substantial population decline.

Landscape Character Areas and Local Landscape Designations

As outlined in Topic Paper Natural Places, the Council published a Landscape Character Assessment (ELCA) in 2010, which has been used to inform LDP preparation and development management since that time. The Council's Review of Local Landscape Designations, also published in 2010, led to 22 Special Landscape Areas being designated by the Edinburgh Local Development Plan (2016) and subsequently City Plan 2030. However, the landscape surrounding and within the city has continued to evolve, reflecting change in land use and land management, and the climate and nature emergencies. The Council therefore sought to update this information to understand the current spatial implications relating to landscape.

City of Edinburgh Landscape and Green Belt Reviews 2026

In preparing the Evidence Report the Council appointed consultants to carry out a comprehensive review of its landscape and green belt. This included a Local Landscape Character Assessment, review of Local Landscape Designations and a review of the existing designated Edinburgh Green Belt within the Council boundary and the existing areas designated Countryside Policy. A further part of the review was also undertaken to assess the sensitivity of the landscape with regard to renewable energy, to guide development to the most suitable locations.

This work comprises of four documents which form background documents to the Evidence Report:

- Landscape Character Assessment
- Local Landscape Designation Review
- Landscape Sensitivity Assessment Renewable Energy
- Green Belt Review

The initial step involved a review of the Edinburgh's Landscape Character Assessment, to establish an objective, baseline description and map of the city's surrounding landscape and main urban open spaces, to inform subsequent landscape and green belt evaluation. This is further described in Topic Paper Natural Places.

From this baseline, a Local Landscape Designation Review was carried out to ensure locally designated sites reflect relevant changes on the ground, and to verify that any Local Landscape Areas (LLAs) recommended for designation in City Plan 2040 align with NatureScot and HES's guidance (2020) and NPF4 Policy 4d. The findings of the Local Landscape Designation Review are set out in Topic Paper Natural Places.

In parallel, the Landscape Character Assessment informed appraisal of the sensitivity of landscapes in the Council area to different types and scales renewable energy development. This Landscape Sensitivity Assessment (LSA) is described in Topic Paper Energy, Heating and Cooling and takes into account values attributed to landscape, such as designations.

Finally, referencing the updated Landscape Character Asssessment, the focus of the Green Belt Review sought to understand how land within the green belt and countryside policy areas contribute to NPF4 Policy 8's second policy outcome, which is: "*The character, landscape, natural setting and identity of settlements is protected and enhanced"*.

The framing of the review followed from discussions held with the neighbouring authorities of East Lothian and Midlothian councils who share the green belt with Edinburgh, along with West Lothian Council who share the countryside and landscape boundary. As the neighbouring authorities were undertaking similar reviews it was considered important to have consistency.

The review of the existing green belt and countryside policy areas against the outcomes of NPF4 Policy 8 Green belts, was initiated in order that:

- Development is directed to the right locations, urban density is increased and unsustainable growth is prevented.
- The character, landscape, natural setting and identity of settlements is protected and enhanced.
- Nature networks are supported and land is managed to help tackle climate change.

The following map is an evaluation of the landscape character areas within the Green Belt and Countryside Policy Area showing evaluation of their contribution to the landscape setting of settlements.

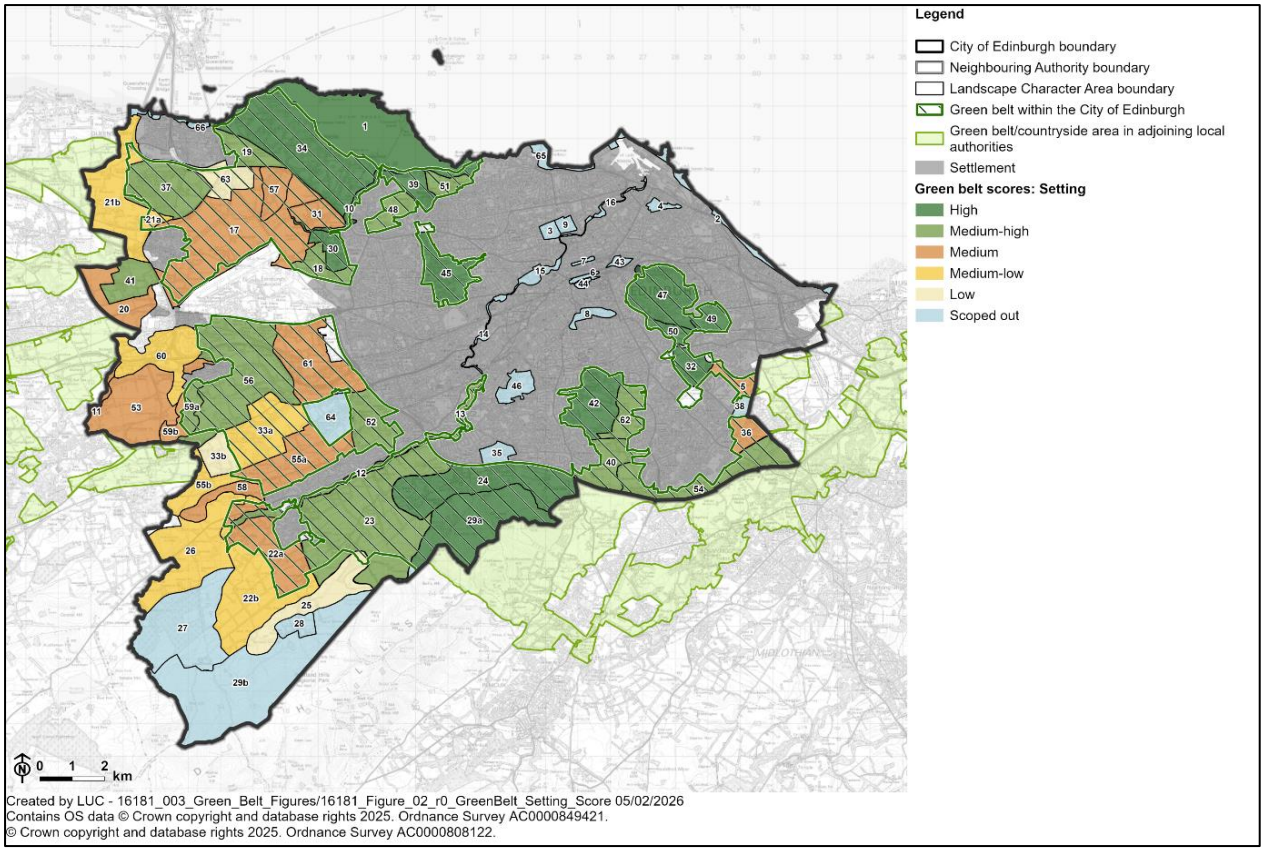


Figure 03.2: Landscape character-based evaluation (source: Green Belt Review, 2026)

The revised Landscape Character Assessment has been reviewed against the second policy outcome to consider the contribution of the landscape character areas (LCAs) to landscape setting and identity of settlements including historic assets, the spatial form and integrity of the green belt in each location, and consideration of inner and outer boundary markers.

In parallel, the role of LCAs in terms of protecting, enhancing and providing access to multifunctional blue and green networks has been additionally evaluated. The assessment is based on landscape character assessment and does not take account of landholdings.

Proposed Plan

This landscape setting and identity information will be combined with evidence on the third outcome including Nature Networks as set out in Topic 03 Biodiversity and land management to support climate resilience as set out in Topic 04 Water Management, flood risk and coastal development at the Proposed Plan stage. As part of the Proposed Plan, the City's needs for the development and use of land will be articulated. This will enable the Council to define and consult upon any possible extension or change to precise green belt boundaries or any potential removal of land from the green belt through the Proposed Plan.

Whilst the adjacent local authorities are at different stages of preparing their plans, consistency of approach is to be maintained through consideration of contiguous landscape character areas and liaison through the Lothian and Borders Planning Officer Group.

Evidence Report Findings: Landscape Setting and Identity

Findings from the current stage of the Edinburgh Green Belt Review 2026 include:

- The existing green belt performs well in terms of the NPF4 policy outcome to protect and enhance the landscape setting and identity of settlements; many areas additionally support recreation.
- Part of the green belt southeast of Queensferry plays a lesser role in terms of setting and identity, where the landscape is fragmented by infrastructure.
- Inner and outer boundary markers are generally considered robust, where these are defined by roads, landform, watercourses and woodlands etc. but some localised weaker markers reflect field or garden boundaries.
- Countryside Policy Area close to settlements often contributes to landscape setting and identity and could be considered for potential green belt designation in future e.g. between Newbridge and Broxburn.
- There may remain a need for a tailored rural designation that is distinct from the green belt to protect countryside which is remote from settled areas, whilst enabling rural development appropriate to the area's needs.

Summary of stakeholder engagement

Key Agency	**NatureScot**
Main views raised	• **Scoping (May 2025):** NatureScot commented that landscape character assessment should be considered to understand sensitivities to development. • **Draft Topic Papers (Nov 2025):** Meeting held with NatureScot to outline the scope of the Landscape Character Assessment and Green Belt Review, alongside related studies.
Council response and implications for the proposed plan	The Council has undertaken an update to its Landscape Character Assessment and a Green Belt Review. This will help to inform the spatial strategy, the Strategic Environmental Assessment (SEA) and site appraisal process.

Is the agency content with the evidence?	NatureScot does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with NatureScot will take place in developing the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Scoping (May 2025):** Homes for Scotland (HFS) commented on the need to carry out a green belt review to ensure this continues to meet NPF4 policy outcomes. • **Final Topic Papers (March 2026):** HFS noted that the Council commissioned a green belt review and requested further information on its scope and method, including how it will direct development to the right locations in relation to other evidence. HFS additionally commented on housing land matters.
Council response and implications for the proposed plan	The Council published The City of Edinburgh Green Belt Review – Landscape Setting and Identity online and directed Homes for Scotland to this for review. This topic paper sets out how the Council's phased approach to reviewing green belt designation allows for consideration of other national policy outcomes at the Proposed Plan stage. Housing land matters are addressed in the Housing Land Topic Paper and are for consideration in preparing the Proposed Plan.
Is the agency content with the evidence?	HFS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.

Actions for proposed plan stage	Housing land matters relating to this subject can be considered in preparing the Proposed Plan.

Other engagement and matters raised

Scoping (May 2025)

- The University of Edinburgh commented on the need to carry out a green belt review to ensure this continues to meet NPF4 policy outcomes.
- To ensure a consistent approach to the review of the Edinburgh Green Belt and Countryside Policy Area designations in line with NPF4, liaison and data sharing has also been undertaken with Midlothian, East Lothian and West Lothian Councils.

These views have been taken into account in taking forward the Landscape Character Assessment and Green Belt Review.

Draft Topic Papers (Nov 2025)

- No comments directly relevant to this topic.

Final Topic Papers (March 2026):

- Edinburgh Airport Limited (EAL) does not raise issues of dispute but highlights an area of land designated as Countryside Policy Area, which could form part of the airport estate in future.

This response is noted. Land use designation matters are for consideration in preparing the Proposed Plan.

Summary of implications for the Proposed Plan

- The Proposed Plan will continue to identify land designated as green belt to support the spatial strategy, where land continues to contribute to the character, landscape, natural setting and identity of settlements, support nature networks and/or is required to manage climate change.
- If any release of existing green belt is required to accommodate future development, opportunities to mitigate landscape impacts, to restore and enhance biodiversity and natural assets, and support health and wellbeing need to be considered. The setting of detailed green belt boundaries could also consider the potential to strengthen boundary markers.
- Boundary changes could also be made to extend the area currently identified as green belt. The balance between land designated as green belt compared to land designated as countryside will need to be determined, considering the

tighter restrictions of green belt policy in NPF4 and the city's development pressures.

- Where a countryside designation is continued, the different policy provisions which enable rural development as distinct from green belt locations will need to be set out.
- Place Profiles will provide greater understanding of the needs of more rural communities within the Council area in terms of community services, transport and housing.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

04: Water management, flood risk and coastal development

Topic	**04: Water management, flood risk and coastal development**
Description of topic	Review of information on coastal change, water management and flood risk from all sources; including the relationship between these and existing land uses as well as initial views on implications for Proposed Plan
Information required by the Act	Section 15(5) • The principal physical and environmental characteristics of the district. Regulation 9 Have regard to: • the national marine plan; • any regional marine plan; • any river basin management plan; • any flood risk management plan; and • any local flood risk management plan.
Relevant NPF4 Policies	• Policy 10 Coastal development • Policy 20 Blue and green infrastructure • Policy 22 Flood risk and water management • National Development 5 – Urban Sustainable, Blue and Green Surface Water Management Solutions
Linked topic papers	• Topic 01e Infrastructure - water and wastewater • Topic 02 Natural Places • Topic 05 Biodiversity • Topic 06 Green blue infrastructure, open space and recreation • Topic 08 and 09 Climate change and climate mitigation
Local Development Plan Guidance	Policy 10 Coastal Development: The Evidence Report should address areas of both developed and undeveloped coast, with particular consideration of projected coastline changes, projected sea level changes and probability of flooding from all sources. Marine planning may provide further relevant information which is relevant to coastal planning. LDP guidance also advises that Scottish Coastal Observatory Data may be of assistance, but this data is not referred to in this topic paper given the coastal monitoring data sites are distant from the City of Edinburgh Council area.

	Policy 22 Flood risk and water management: The Evidence Report should consider the probability of flooding from all sources and flood risk management plan. The Evidence Report and should be informed by a Strategic Flood Risk Assessment (SFRA) designed for the development planning process primarily to avoid increasing overall flood risk by avoiding areas of flood hazard. SEPA should be consulted on SFRAs. For planning purposes, at risk of flooding or in a flood risk area means land or built form with an annual probability of being flooded of greater than 0.5%, including climate change allowance and cross boundary flooding and water issues. SEPA's position statement on elevated buildings in areas of flood risk is a relevant consideration. Evidence Reports must have regard to SEPA flood maps and any flood risk management plans, Surface Water Management Plans and local flood risk management plans. Scotland's Mapping Flood Disadvantage tool is suggested as a helpful resource and this is addressed in Topic 08 and 09 Climate change and climate mitigation. LDP guidance also notes Evidence Reports should consider river basin management plans and the water environment hub. These relate to the water environment and associated issues such as natural capital. As a result, they are addressed as part of Topic 5 Biodiversity.
List of and links to evidence	• **CD100** National planning Framework 4, Scottish Government, February 2023, • **CD548** Edinburgh Strategic Flood Risk Appraisal Methodology Report, Mott MacDonald, April 2026 • **CD036** Strategic Flood Risk Appraisal Webmap, City of Edinburgh Council, April 2024 • **CD301** Edinburgh's Strategic Green Blue Network storymap, City of Edinburgh Council • **CD312** Green Blue Network Map Viewer, City of Edinburgh Council • **CD631** SEPA's Guidance for planning authorities on undertaking a Strategic Flood Risk Assessment to support their local development plan, SEPA, May 2025 • **CD629** SEPA Planning Advice Note for Planning Authorities – LDP Evidence Gathering: Achieving a

sufficiency of evidence relating to flood risk and water environment, SEPA, December 2024

- **CD6245** Planning guidance and advise notes, SEPA, 2026
- **CD620** Local Development Plans Evidence Gathering Resource Pack for Planning Authorities Part One: Overview Document, SEPA, November 2023
- **CD613** Evidence sources by NPF4 policy topics, SEPA, November 2023
- **CD413** Dynamic Coast: The National Overview, Centre of expertise for waters, 2021
- **CD435** Dynamic Coast 2 Advanced Webmap, Dynamic Coast, 2016
- **CD459** Local Flood Risk Management Plan Cycle 2: 2022-2028: Forth Estuary Local Plan District, Falkirk Council, 2023
- **CD616** Flood Risk Management Plan: Forth Estuary, SEPA, December 2021
- **CD128** Coastal Change Adaptation Plan Guidance, Scottish Government, February 2023
- **CD625** Position statement on elevated buildings in areas of flood risk, SEPA, January 2022 (updated September 2023)
- **CD110** Scotland's National Marine Plan: A Single Framework for Managing Our Seas, Marine Scotland, March 2015
- **CD166** National Flood Resilience Strategy, Scottish Government, December 2024
- **CD195** Scotland's First Marine and Coastal Restoration Plan, Scottish Government, December 2025
- **CD632** The River Basin Management Plan for Scotland 2021-2027, SEPA, December 2021
- **CD626** River Basin Management Plan 3: 2020 condition mapping of surface water and groundwater, SEPA, 2020
- **CD614** Flood maps, SEPA, 2025
- **CD607** Geomorphic risk buffer mapping, Scotland's Environment
- **CD424** South East Scotland Coastal Risk Assessment, Climate Ready Southeast Scotland (CRSES), April 2025
- **CD382** Vision for Water Management in the City of Edinburgh, City of Edinburgh Council, November 2020
- **CD621** National Flood Risk Assessment 2025, SEPA December 2025
- **CD618** Identifying Opportunities for Natural Flood Management, SEPA, December 2013
- **CD622** Natural Flood Management Handbook, SEPA, December 2015
- **CD436** Dynamic Coast 2 social disadvantage webmap, Dynamic Coast, 2016

	• **CD164** Mapping Flood Disadvantage in Scotland 2015: report, Scottish Government, December 2015 • **CD144** Flood Disadvantage mapping - Scotland, Scottish Government, February 2025 • **CD032** City Plan 2040 Evidence Report consultation response from University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026)

List of matters covered

This topic paper considers the following in relation to:

- flood risk
- strategic flow paths and water management
- water quality
- coastal change

Summary of evidence

National context

Scotland's National Flood Risk Resilience Strategy sets out a vision that people and places are ready for increased flooding and adapting to climate change in an inclusive and fair way. The Strategy recognises that the scale of the flooding issue means it is not simply a problem that can be 'fixed' but that the focus should be on making places more flood resilient in a manner that benefits everyone.

The summary information from the National Flood Risk Assessment 2025 highlights that a significant number and proportion of Edinburgh's properties are at risk, with the majority of these being residential and that the risk from surface water and small watercourses is particularly significant as shown in Figure 04.1.

Local Authority	NFRA 2025 Total properties in areas at risk	Residential	Non-residential	Percentage of total properties that are in areas at risk	Rivers	The sea	Surface water & small water-courses
City of Edinburgh	39,100	36,500	2,600	14%	6,000	400	34,700

Figure 04.1: Summary information on flood risk for the City of Edinburgh (source: National Flood Risk Assessment)

It is also noted that the overall number of properties at risk (39,100) has increased significantly even from the 24,800 noted in the last national flood risk assessment in 2018. The number of properties projected to be affected by 2100 is even greater, with 64,500 properties expected to be at risk.

Scotland's First Marine and Coastal Restoration Plan sets out the aims to better understand where active restoration can take place to prioritise species and habitats, maximise ecological benefits and social and economic opportunities, and support community led restoration and enable investment in restoration.

Dynamic Coast: The National Overview (2021) highlights that, although coastal change has always been an ongoing process, climate change is exacerbating and accelerating it. The increasing rate of erosion and sea level rise are just two of the main impacts that need to be considered. By comparison, approaches to coastal management have been slow to change and this needs to be addressed. The overview also highlights that vulnerability to coastal change is unevenly distributed geographically and socially. As a council with a large extent of developed coastline, it is important for Edinburgh to respond to these issues.

Scotland's National Marine Plan: A Single Framework for Managing Our Seas provides a high-level framework for management and spatial planning of Scotland's seas. The Marine Plan addresses a diverse range of issues, including many with some implications for land use planning. These include ecology and renewable energy. Where relevant, these are addressed in Topic 5 Biodiversity and Topic 7 Energy, zero waste, heating and cooling respectively.

SEPA Planning Advice Note for Planning Authorities – LDP Evidence Gathering: Achieving sufficiency of evidence relating to flood risk and the water environment reiterates the requirement of NPF4 that relevant water environment evidence should identify opportunities to enhance nature networks and blue and green infrastructure. Information relating to recommended riparian corridors, riparian vegetation enhancement, obstacles to fish migration and any Water Environment Fund projects is addressed in Topic Paper 5 Biodiversity. Evidence specified in the PAN relating to the water environment is addressed below in this topic paper, including Scottish Wetland Inventory, natural flood management, geomorphic risk and outputs of the SFRA.

Regional and local context

The Local Flood Risk Management Plan covering the council area is the Forth Estuary Local Plan District 2022-2028. This sets out actions to avoid and reduce the risk of flooding but recognises a varying scale of flooding issues and solutions means that collaboration between organisations is key to this. The Local Flood Risk Management Plan: Forth Estuary Local Plan District and SEPA's Flood Risk Management Strategy include consideration of various potentially vulnerable areas within the Forth Estuary with Edinburgh itself having several areas within it.

Levels of flood risk from different sources are considered as is the level of exposure and annual damages. The main area in Edinburgh with highest annual damages (approximately £5.8 million) is the area around the Water of Leith. River flooding makes up 80% of the food risk in this area arising from the Water of Leith itself and the Murray Burn. The need for further study of this area is a key action in the management plan, and this is important for informing more up-to-date and detailed consideration of flood risk in this area. In turn, this is helpful guiding Council decisions, including guiding development and what form this should take. Work has been undertaken on three detailed flood studies for the Council area, including for the Water of Leith, which have been factored in the Strategic Flood Risk Appraisal supporting this Evidence Report as detailed further below.

Flood risk

A Strategic Flood Risk Appraisal (SFRA) has been produced to support the Evidence Report. This takes the form of a webmap which is supported by a methodology note. The SFRA identifies areas of flood risk in line with NPF4 and SEPA guidance on SFRAs; as well as other SEPA guidance on evidence gathering, evidence by issue, evidence by policy , and sufficiency of evidence. In particular, this means the SFRA and this Evidence Report has adopted the precautionary principle, accounted for climate change projections and holistically considered flooding from all sources.

The SFRA divides areas of flood risk into four categories: current risk, current critical risk, future risk and future critical risk. Critical risk and future critical risk relate to areas where there is a higher hazard of flood risk which pose a greater level of constraint to the area with an annual probability of flooding of 0.5% or higher, which would be more difficult for developments to overcome to comply with NPF4 policy and SEPA guidance. Non-critical risk refers to risks such as surface water where there is a level of risk, but where it is more likely to be able to be overcome on-site in line with NPF4 and SEPA guidance. Future flood risk shows where climate change could cause an area to become at risk or even critical risk compared to the current baseline.

The SFRA takes a precautionary approach in projecting flood risk. This includes flood defences which – in the absence of more detailed information and investigation - have been assumed to not alter the extent of flood risk shown in SEPA flood risk mapping. This is because there could be considerable variation in the condition, extent, effectiveness of these defences and how long they may last and if/how they could continue to be maintained or improved. It may be that further detailed investigation could reveal that some defences could offer a level of protection to development however that is beyond the scope of this strategic, city-wide assessment.

It is also noted that SEPAs flood models are currently being updated with wave overtopping data, which will lead to further increases in the amount and distance inland that coastal flood waters reach. The SFRA methodology report details how the

SFRA has taken a precautionary approach beyond the current flood risk layers to attempt to account for limitations of current coastal flood risk mapping. SEPA models also do not account for erosion and assume the sea-land boundary shall remain. In reality, however, erosion will occur and increase the extent of coastal flood risk. This further emphasises the importance of adopting the precautionary principle.

The SFRA shows some of the main areas at current critical flood risk are stretches of the Water of Leith. Although flood defences exist along much of this, further study would be needed to see what, if any, protection could be offered by these for new development.

The River Almond has a considerable flood plain along much of its length. This combines with the Gogar Burn to cause much of Edinburgh Airport to be at critical flood risk; however, the majority of the City Plan 2030 proposals for development at West Edinburgh (Place 16) continue to fall outside of critical risk areas. Where there are small areas of critical risk, these can continue to be accommodated in greenspaces within these allocations as identified in the West Edinburgh Placemaking Framework.

Much of the land south and south-east of Kirkliston adjacent to the northern banks for the River Almond is at critical flood risk. The land further from the river more immediately to the east of Kirkliston is at less risk, although the land becomes at more critical risk again after around 1km east of Kirkliston beyond Carlowrie Castle.

There is a significant area of critical flood risk at South Gyle, although most of this relates to Gyle Park and the David Lloyd sports centre. Similarly, there are some notable critical flood risk areas along the Braid Burn but these also mostly relate to greenspace.

The majority of Edinburgh's coastline is affected by a level of critical flood risk. Much of this relates to beach areas and undeveloped coast west of the city but where this coastal risk does affect developed coastline, it mainly affects Edinburgh's harbour areas.

Non-critical flood risk is more widely spread across Edinburgh with a significant proportion of this relating to surface water flood risk. Although the individual areas at risk of surface water and small watercourse flood risk are generally smaller, the distribution of risk is more pervasive and finer grain, especially in urban areas. This is a logical correlation given urban areas are defined by much less porous ground which significantly contributes to surface water flood risk. In some cases, such as where this non-critical risk relates to just surface water, it will be possible to mitigate this. In order to establish this however then a site-by-site analysis would be required using the SFRA at the site assessment stage, for example to establish if any risk identified by the SFRA related to small watercourses that actually pose a more significant constraint.

Some of the more pronounced areas of risk exist in open spaces within the urban area such as the Meadows. These are the less problematic locations for surface water flooding events given the absence of development. Unfortunately, however, other notable areas of surface water flood risk relate to more inhabited areas such as Colinton, Blackhall, Muirhouse and Drylaw and older parts of Edinburgh such as Leith and the Old Town. In older parts of the city, issues of surface water flooding are often compounded by the fact that surface water is handled by combined sewers that also manage wastewater that can cause unsanitary backup of waste water during surface water flood events.

Future critical flood risk only introduces some further areas of risk. There are two main areas within or adjacent to urban areas noted here. Firstly, there is an area of critical future risk along Edinburgh's boundary with West Lothian at the north-eastern edge of East Calder. Secondly, there is an area at the waterfront as the Water of Leith as it reaches Leith docks. This area of future critical risk area broadly follows the route of the A199, mostly to the east, and covers some of the adjoining urban area and streets to the north and south of this road.

There are also some areas of non-critical future risk. The main change in relation to future risk compared to the present day is in relation to fluvial flood risk, although there is still some additional coastal and surface water and small watercourses flood risk too. Some of the main areas being additionally affected by future non-critical risk are along the coast, including parts of Leith docks, Granton Harbour and Western Harbour.

SEPA flood risk mapping shows broad areas but with a level of approximation to their boundaries. This means areas adjacent to flood risk areas should still be considered as being potentially constrained and may need further assessment in line with the precautionary principle, NPF4 and SEPA guidance. This especially applies to areas of future critical flood risk where the extent of uncertainty about exact boundaries is higher and the degree of impact could be significant.

SEPA's position statement on elevated buildings in areas of flood risk sets out that 'sites suitable for the development of elevated buildings must be identified through the development planning process.' If, or where, such sites are to be identified, this will be at the stage of Proposed Plan preparation as part of a next stage of the SFRA, however that later stage will be able to use the information collated and presented in the SFRA for the Evidence Report to help initially identify where such opportunities may exist; subject to that further analysis.

Mapping Flood Disadvantage in Scotland 2015: Main Report and its mapping give insight into the issue of flood risk and climate change through the lens of social vulnerability by identifying the neighbourhoods with communities most at risk from flooding affecting those most likely to be adversely impacted by it.

Edinburgh has several neighbourhoods where this overlap occurs. In particular, the South West of the City primarily the areas along the Water of Leith, Leith waterfront and to the south-east of the city at Little France. This is shown in the SIMD mapping core document.

SEPA Natural Flood Management mapping shows opportunity areas for floodplain storage. These maps should be read in conjunction with SEPA's publication on Identifying Opportunities for Natural Flood Management (2013) and Natural Flood Management Handbook (2015). Natural flood management mappings show a range of opportunity types for both runoff reduction and floodplain storage. Some the main areas of opportunity are east of Kirkliston in the flood plain of the River Almond and also on the nearby culverted section of the Gogar Burn on airport ground immediately before it flows into the River Almond. As seen in the SFRA, these are also areas of fluvial flood risk so capitalising on an opportunity here may be of particular importance.

The Natural Flood Mapping layer for sediment management also shows these same stretches of the River Almond and Gogar Burn having high levels of sediment deposition and illustrates there can be overlap between these issues. As may be expected, immediately upstream of this high deposition are sections of high and moderate erosion on both the River Almond and Gogar Burn. Again, this highlights the importance of seeking to improve these situations given the potential positive effects on both the watercourses themselves and also knock-on effect on fluvial flooding.

The sediment management map also highlights that there are significant sections of moderate and high erosion upstream in the Water of Leith and its tributaries as well as along the Figgate Burn and Brunstane/Burdiehouse/Niddrie Burn. Deposition is an issue along different parts of these watercourses but it is especially pronounced at the mouth of the Water of Leith.

Coastal flood risk is addressed further in the section coastal change later in this topic paper.

Strategic flow paths and water management

Geomorphic risk buffer mapping provides high-level modelling of where there may be particular geomorphic risk. Generally, this correlates with the section's high and moderate erosion shown in figure 04.1 below however it is not always the case. For example, there is notable geomorphic risk at Bonnington along the Water of Leith even though this is largely an area of deposition.

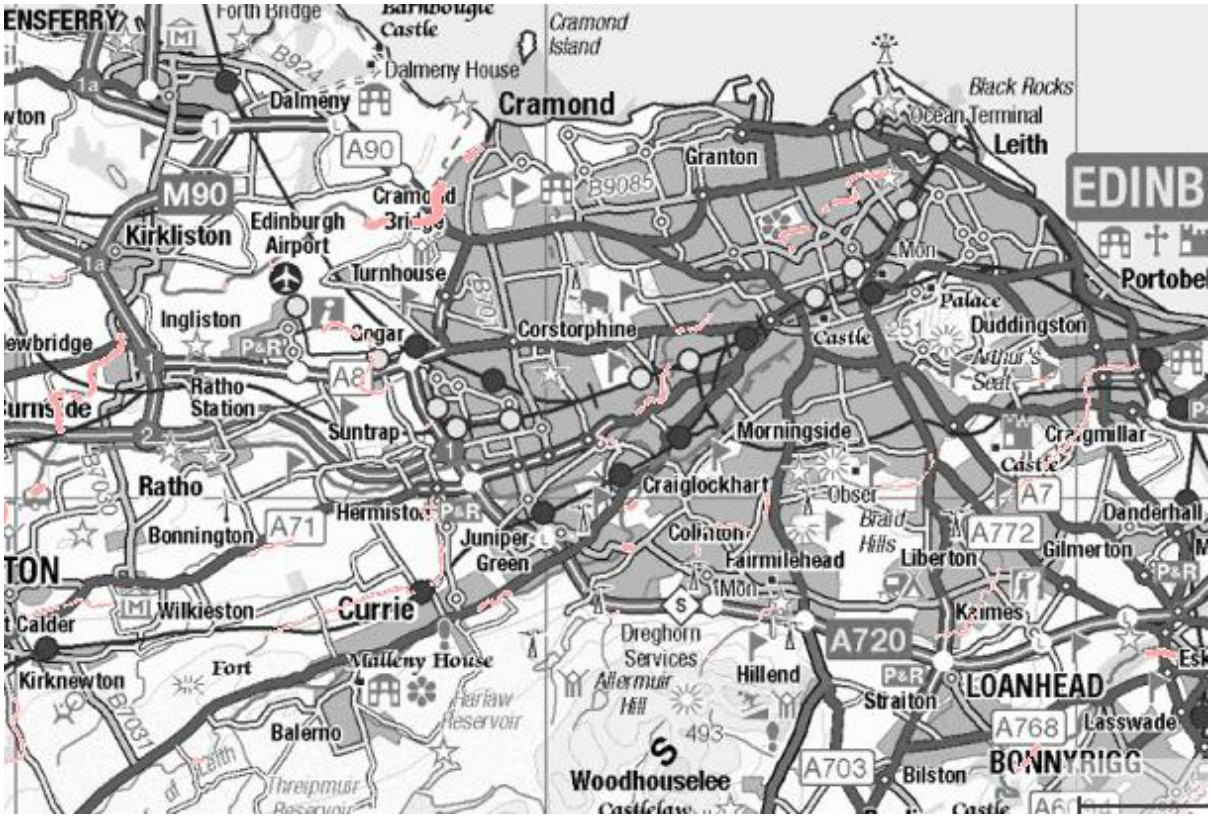


Figure 04.1: SEPA mapping showing geomorphic risk buffer (note: areas of geomorphic risk shown in pink)

Aside from the Water of Leith, the main areas of geomorphic risk are along the River Almond at Cramond Bridge and west of Newbridge as well as significant extent of the Gogar Burn, Murray Burn, and Brunstane/Burdiehouse/Niddrie Burn. Geomorphic risk has been accounted for in the SFRA as a form of risk that will inform the site appraisal process.

The Strategic Green Blue Network mapping below identifies areas that represent particular opportunities to improve water management, for example deculverting watercourses. The Green Blue Network storymap provides more information on what is contained in the mapping and how to use the mapping.

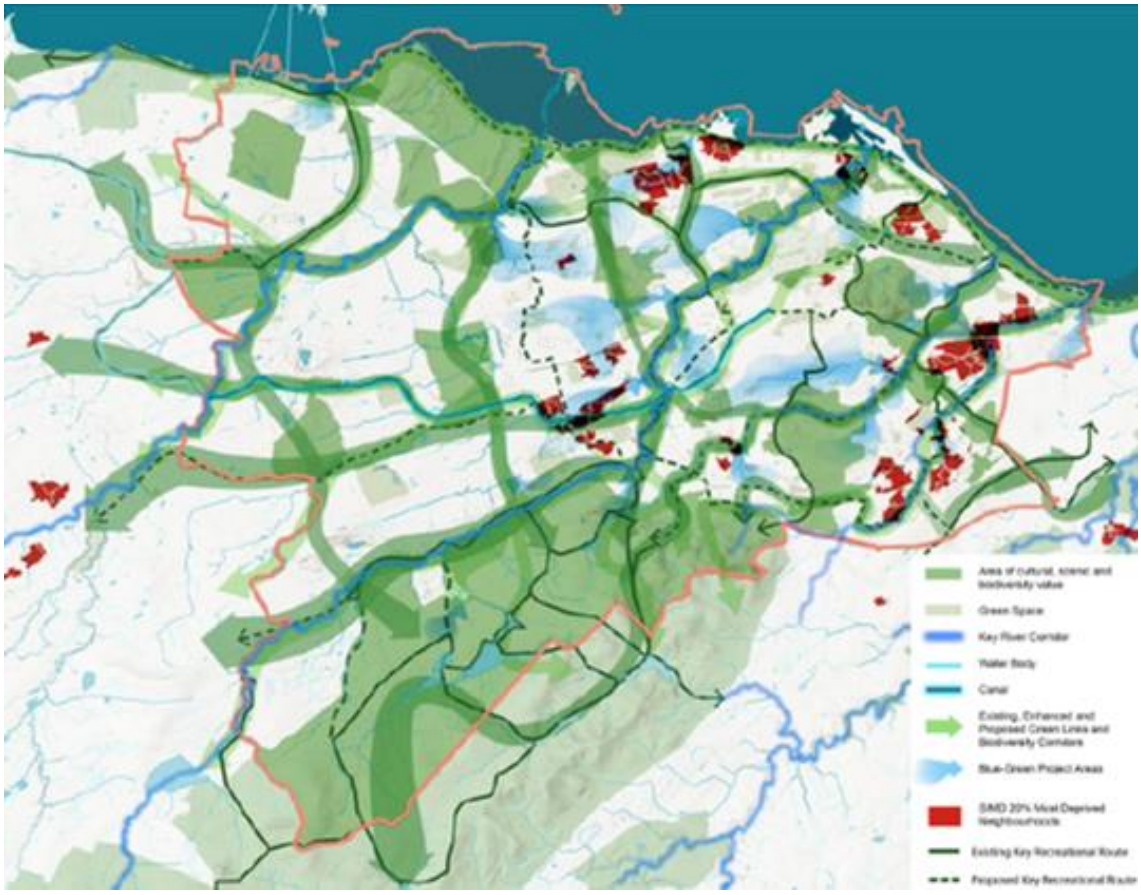


Figure 04.2: Strategic Green Blue Network map

A key purpose of the Strategic Green Blue Network map is to consider multiple forms and benefits of different types of green blue infrastructure holistically. This is detailed further in Topic 6 Green blue infrastructure, open space and recreation. The Strategic Green Blue Network can be broken down, however, to focus in on the water element of the network specifically to see what this looks like spatially whilst still being able to understand how the water element can contribute to wider green blue outcomes. Figure 04.3 below shows this 'strategic blue network'.

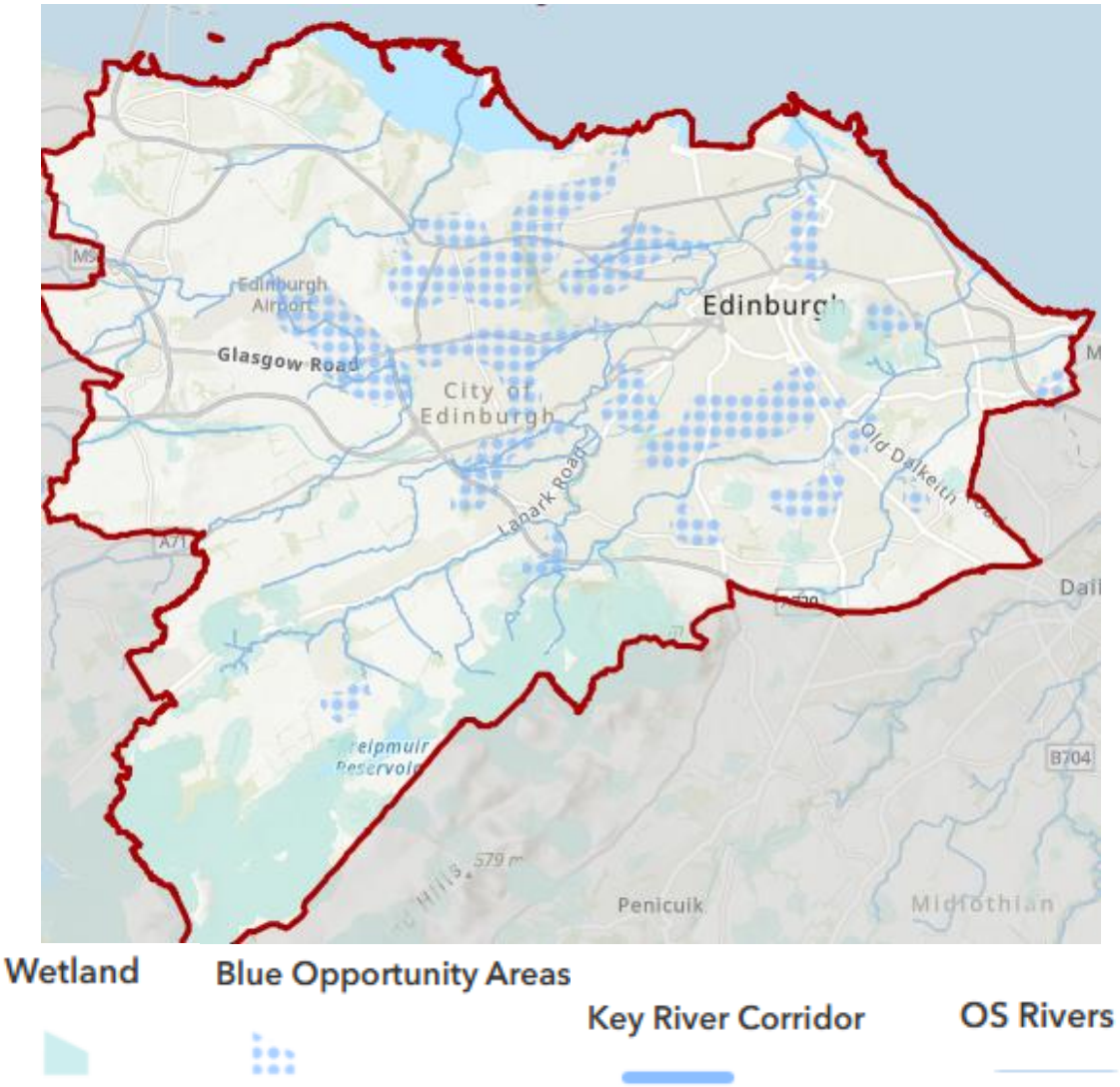


Figure 04.3: Blue network as taken from Strategic Green Blue network mapping

In this context, it is important to recognise the Vision for Water Management in the City of Edinburgh and the role of the Edinburgh and Lothians Strategic Drainage Partnership (ELSDP) as the regional body facilitating the strategic approach to water management across Edinburgh and the Lothians. Key priorities relate to better understanding and delivering improvements to water management and flood risk, especially in identified priority areas such as Craigleith. This will often involve proposals such as deculverting and disconnecting surface water connections to combined sewers.

An example of this are 'off-site' proposals that would not be typically delivered as part of wider development, but which are also key to cumulatively improving water management and flood risk in the city. The ELSDP has recently helped coordinate the delivery of a new swale and SuDS tree at Orchard Park. This project illustrates the best practice that should be adopted for all blue green infrastructure proposals by providing multiple benefits, not just for water management but also enhancing

biodiversity, temperature regulation, benefits to the public realm and wellbeing of people. The ELSDP also identifies other projects in the Craigleith catchment area (seen in map 4-3 above as a key opportunity area). For example, design work for projects at Arboretum Place and Easter Drylaw Drive is now well progressed.

The Water Vision and ELSDP also recognise that it is important for developments themselves to deliver improvements to water management and flood risk. Several key objectives relate to specific design principles that it is fundamental for developments to incorporate at an early stage. Developments should convey, attenuate and store storm water safely above ground for reuse and dispersal. They must manage the first 5mm of rainfall at a plot level where appropriate and adhere to the SuDS management train approach so run-off is managed in stages as it drains through and from a site. Developers should work with the Council and Scottish Water to remove and reduce stormwater in the existing combined sewer network.

An example of this is at the Astley Ainslie hospital site where ELSDP is actively pursuing improvements here which include deculverting of the existing watercourse and better management of surface water to reduce flooding issues from multiple sources (watercourse, surface water and sewer network). This is the sort of improvement that would be expected to be realised through the future redevelopment of the Astley Ainslie site given that this is a re-development proposal in City Plan 2030.

The above projects relate to the key priority areas (Craigleith and Jordan Burn), however there are other broader areas with potential for improvement indicated in the strategic green blue network, for example the catchment area of the Stank Burn covering parts of Corstorphine and South Gyle. These relate mainly to existing urban areas given these tend to have both more properties currently at risk combined with issues like combined sewers, culverting and hard surfacing which means these areas are often the focus of prioritisation.

There are some less developed areas that can benefit from improved water management, however. For example, there are many locations and ways in which there is potential to improve water management. For example, at West Edinburgh there are sections of the Gogar Burn which have been culverted, channelised and artificially straightened with detrimental effects on both flood risk and the water environment. These cause issues which are particularly evident at the airport itself but do extend beyond this.

Measures for water management should maximise other associated benefits in addition to water handling. For example, they should provide habitat value, visual amenity and reduce the urban heat island effect with greater green and blue surface area. This is also addressed further in Topic 06 Green blue infrastructure, open space and recreation.

The Council has produced a Surface Water Management Plan (SWMP) which will be used to inform the Proposed Plan. The SWMP helps to identify key priority areas in terms of adverse impacts and risk. This will help inform identification and prioritisation of opportunities for improvement.

Although the SWMP has not been published due to containing sensitive information, work has taken place and outputs from it this have been incorporated into the baseline SFRA including the strategic water flow paths where these are known. These are main routes that water takes to travel before eventually leading to the sea. It includes both watercourses as well as overland flows but not the sewer network. This separates the routes into primary and secondary categories with primary routes shown in thicker dark blue arrows and secondary routes in narrower mid-blue arrows. Primary routes like the Water of Leith handle larger flows, whereas secondary routes convey lesser but still notable flows. The direction of the arrow shows the direction water flows along the routes. An example of this is shown in the excerpt from the SFRA GIS mapping shown below in figure 04.4.

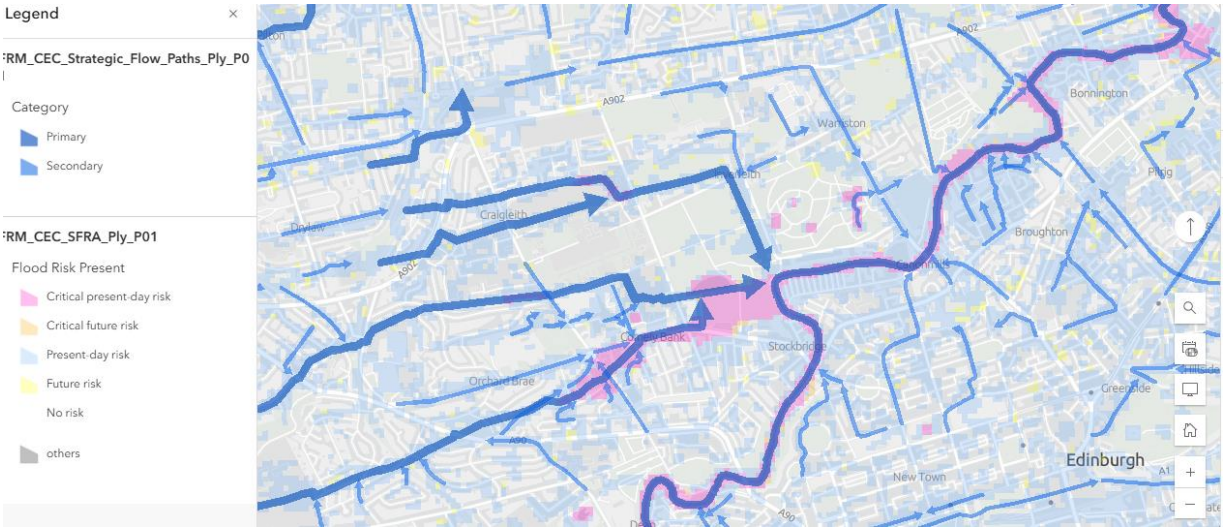


Figure 04.4: Excerpt from the SFRA GIS mapping focused on Comley Bank (note: for this image, flood risk layers have been made more opaque to enable flow paths to appear more prominent)

Identifying these flows can help to understand flood risk and its causes including opportunities to reduce risk and improve water management. For example, using flow path mapping in conjunction with flood risk area mapping can show where a culvert bottleneck may be causing particular issues and suggest daylighting the culvert as a potential improvement. Alternatively, overland flow paths may contribute to an area of surface flood risk further along the conveyance train and so being able to identify potential opportunities to attenuate and slow flows on these paths may help to reduce risk in locations away from the intervention itself.

Figure 04.4 above illustrates how understanding flow paths and relationship with flood risk areas can help identify opportunities for improvement. It shows that

multiple flow paths are converging on areas of critical flood risk at Orchard Brae, Comely Bank and north of Stockbridge. Although the Water of Leith is undoubtedly a significant contributor to some of this flooding, being able to identify flow paths that are also contributing is key. It can help focus attention on where and how to identify opportunities to better manage some of these flows up the conveyance train to reduce their subsequent effect on areas of flooding.

There are flows paths across the city and surrounding area, with some of the key primary routes being the larger watercourses like the River Almond and the Water of Leith as may be expected. It should be noted that there are many other primary flow paths that are not open watercourses however, with some even being culverts.

Flow paths (and flood risk) have also been considered in the context of Topic 06 Green blue infrastructure, open space and recreation in terms of the overlap of blue infrastructure with greenspaces and the green network.

The Council is currently updating its Open Space Audit and Open Space Strategy (OSS). As part of this, the Council will be assessing whether the surveyed open spaces of the Council area provide a SuDS function. The audit and OSS will form part of the evidence base for the preparation of the plan. Where open spaces provide a SuDS function, or have potential to do so considering evidence sources such as the SFRA and Strategic green blue network, then there is the potential for enhancement of these spaces to be identified. This would need to consider other functions of space as well. This is addressed further in topic paper 06 (Green blue infrastructure, open space and recreation).

Water Quality

Figure 04.5 shows the latest SEPA mapping on overall surface water condition from 2020 in relation to the Edinburgh area.

Figure 04.5: SEPA mapping on overall surface water condition from 2020

The mapping shows that the overall status of many of Edinburgh's watercourses are in poor condition including some of its main ones such as the Water of Leith, River Almond and the Gogar Burn. SEPA mapping allows the overall quality to be analysed by each contributing factor. This reveals that the poor access to fish migration is the key issue contributing to this poor rating for the River Almond and the Water of Leith. The issue of fish migration is addressed further in Topic 05 Biodiversity.

The physical condition, water flows and levels are more positive for these watercourses, although all three only achieve a moderate rating for water quality. This is notable considering that over 86% of Scotland's watercourses are achieving a high or good by comparison. It is recognised that pollution of these watercourses is an issue which needs to be addressed. Although run-off from Edinburgh's urban area will be a contributing factor to water quality, SEPA's River Basin Management Plan for Scotland 2021-2027 notes the importance of improving land management practices to reduce pollution is especially important. A significant proportion of Edinburgh's green belt and countryside is in arable farming use and so there is scope to improve water quality from this, as well as other land uses and developments contributing to pollution.

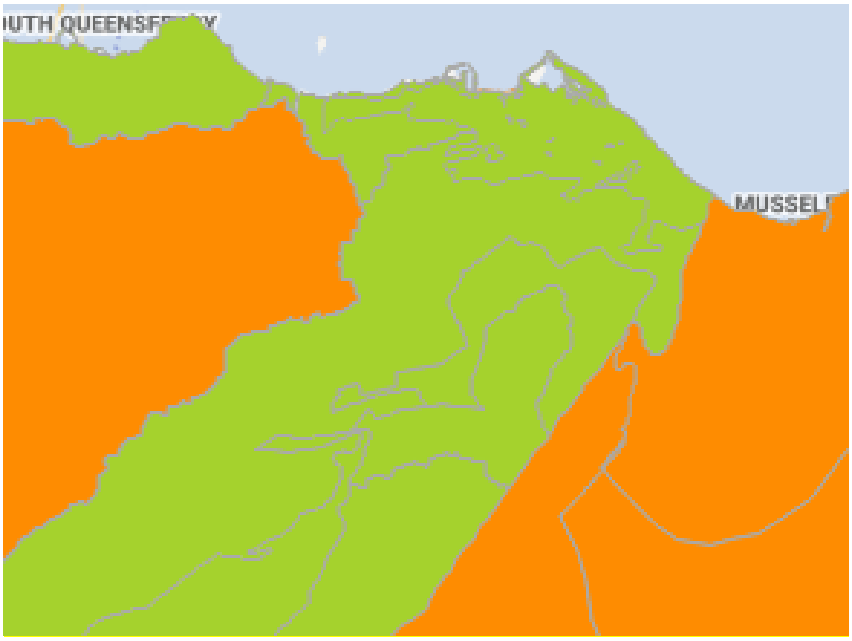


Figure 04.6: SEPA mapping on overall groundwaters condition from 2020

Most of Edinburgh's urban and coastal areas have an overall good standard of groundwater, as does the Pentland Hills. Unfortunately, the council area to the west of the city is rated as poor; due to poor water quality as well as poor water flows and levels.

Coastal erosion

The CRSES Coastal Change Assessment – South East Scotland sets out the current and projected extent of coastal erosion under a 95th percentile scenario for climate change. As previously noted, the current extent of Edinburgh's coastline subject to erosion is 71% (based on monitored transects). However, this is due to rise to 94% by 2100 in part due to the sea level rise coming with climate change. In these transects projected to erode, the extent to which this erosion is projected to progress inland is also significant. Under a scenario of accommodating erosion, there would be a median progression of 28.31m, although this could vary based on other factors

Edinburgh is pioneering best practice in planned retreat of existing assets and avoiding new development in at-risk locations, for example at Granton Waterfront Park. These innovative, climate resilient development pathways involve a combination of moving existing assets like buildings and infrastructure away from the coast, replacement with a coastal buffer, building new assets landward of the coastal buffer and use of temporary leases to ensure economic vitality of the area. The approval of short-term leases (up to 25 years) to The Pitt at Granton is an example of best practice for maintaining economic productivity alongside avoiding new development.

The Dynamic Coast 2 advanced webmap provides an important source of information on coastal change, particularly potential coastal erosion and projected sea levels (referred to as mean high water springs or MHWS). Erosion and sea level

change are projected under a high emissions scenario in line with the precautionary principle.

It should be noted that Dynamic Coast 2 provides broad insights based on certain key baseline information, but it is not possible for it to provide completely exhaustive modelling. For example, it cannot account for the variances in the nature and condition of existing sea defences at different parts of the coast. It also cannot account for actions of the Council and other organisations and how this may affect coastal change since many of these decisions have not yet been taken.

Whilst the webmap cannot cover all modelling, for the Edinburgh area the Dynamic Coast 2 advanced webmap shows a number of areas along the coast at risk of an incremental level of erosion and change to the high-water mark level.

Figure 04.7: Dynamic Coast 2 webmap with areas of erosion and the altered coastline at high water mark under 2100 under a scenario of a high level of emissions (source: Dynamic Coast 2 webmap, 2026)

Portobello is a developed coastal area and is at risk of up to 50m of erosion and encroachment of MHWP inland by 2080, although it is reiterated that this is under the high emissions scenario and that detailed consideration of existing sea defences and future choices in respect of sea defences are important outstanding factors. Other smaller pockets of erosion and HMWS encroachment are shown, although these generally relate to undeveloped coastal areas which are less populated, non-urban areas – mostly between the mouth of the River Almond and the east side of Queensferry.

Effect of coastal erosion on human and environmental features

The CRSES Coastal Change Assessment – South East Scotland contains further analysis of how a range of assets types may be affected by coastal erosion over different time periods under a 95th percentile scenario for climate change. The use of a 95th percentile scenario is in line with the precautionary principle adopted in relation to flood risk for example per NPF4.

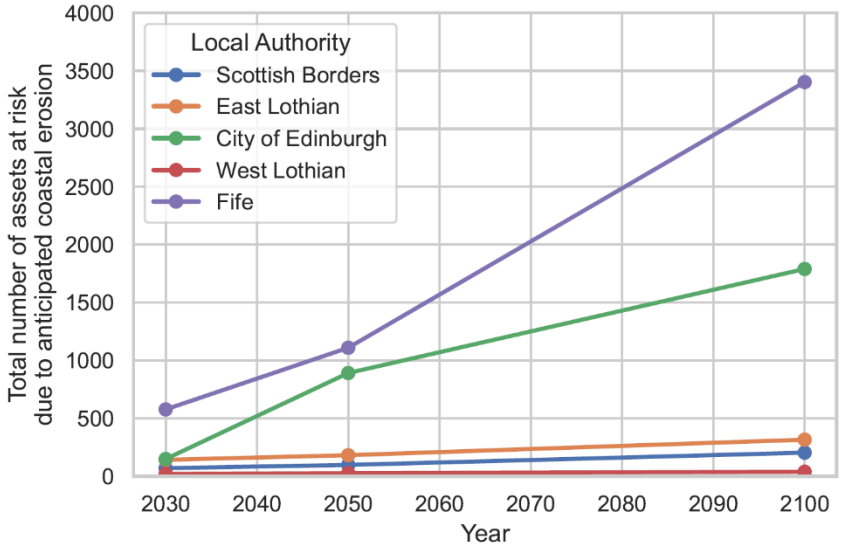


Figure 04.8: total number of assets at risk of erosion over time from coastal erosion for Council areas along the Forth estuary (source: CRSES Coastal Risk Assessment - Southeast Scotland, Final Report 11/04/2025)

Figure 04.8 considers a range of human and environmental assets such as roads, paths and greenspace. Overall, this illustrates the significant rise in relative risk to assets from coastal erosion for Edinburgh, even over a comparably short time frame of next 20 years. Edinburgh's high number of assets at risk is notable considering its coastline is much smaller than other authorities reflects that the City has a much greater proportion of its coastline that is developed. This highlights the particular risk that coastal change and erosion poses to Edinburgh.

City of Edinburgh									
Assets	**Unit**	**2030 (Undefended)**		**2050 (Undefended)**		**2100**			
		EA	**EI**	**EA**	**EI**	**EA (Undefended)**	**EA (Defended)**	**EI (Undefended)**	**EI (Defended)**
Care Homes	Number	-	-	-	-	1	-	-	1
Coastal NRPs Poly	Number	4	22	33	42	341	78	101	111
	Area	80	1,167	5,274	9,500	174,547	15,017	11,163	14,766
Coastal RPs Poly	Number	1	23	78	520	2878	416	696	828
	Area	3	426	4,600	28,156	608,443	48,938	50,521	72,900
Cycle Paths	Number	1	9	11	11	15	13	8	9
	Length	17	2,656	5,336	1,637	11,317	9,952	98	388
	Number	1	1	6	6	17	10	8	10

Greenspace	Area	759	6,047	10,818	10,218	118,015	20,785	12,900	11,584
HES GDL	Number	1	1	1	1	1	1	1	1
	Area	5,248	34,017	39,744	43,896	223,421	197,589	55,090	54,734
HES PIC	Number	1	1	1	-	1	1	-	-
	Area	66	6	73	-	73	73	-	-
HES Sched Monument	Number	1	1	1	-	4	2	1	2
	Area	70	15	85	-	2,740	104	1,013	741
National Cycle Network	Number	-	3	2	4	4	4	5	4
	Length	-	216	47	316	1,070	979	610	590
Woodland	Number	-	-	-	-	5	3	5	3
	Area	-	-	-	-	10,567	3,476	7,153	3,685
Rail	Number	-	1	1	1	13	2	4	2
	Length	-	82	238	260	1,417	282	99	112
Recycling Centre	Number	-	-	3	11	299	35	18	26
Roads	Number	1	16	40	49	252	80	124	71
	Length	12	1,147	2,583	2,109	22,074	5,448	2,431	2,488
SNH SPA	Number	6	6	6	6	6	6	6	6
	Area	20,558	28,259	54,936	11,095	87,833	86,597	2,911	3,914
SNH SSSI	Number	6	6	6	6	6	6	6	6
	Area	20,613	28,458	55,183	11,094	88,079	86,843	2,911	3,914
Vacant Derelict Land	Number	1	2	5	6	8	8	7	8
	Area	249	5,067	5,229	8,921	94,444	19,370	12,248	11,853

Figure 04.9: Asset intersection under RCP 8.5, 95th percentile for future erosion 2030 to 2100. Source: Evidence Report consultation response from University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026))

City of Edinburgh									
		2030 (Undefended)		2050 (Undefended)		2100			
Assets	**Unit**	**EA**	**EI**	**EA**	**EI**	**EA (Undefended)**	**EA (Defended)**	**EI (Undefended)**	**EI (Defended)**
Business and Industry Area	Number	1	1	1	1	1	1	1	1
	Area	107	4,360	20,776	20,493	259,736	37,066	26,731	22,228
Conservation Areas	Number	4	4	4	4	5	5	5	5
	Area	6,357	28,910	58,047	35,680	378,219	127,739	35,167	37,024
Landfill Areas	Number	4	5	5	5	5	5	5	5
	Area	7,203	17,555	43,411	24,694	226,640	59,511	19,181	24,592
Local Biodiversity Sites	Number	2	2	2	3	4	3	5	4
	Area	9,305	56,648	79,032	70,151	477,303	288,471	85,790	85,650
Local Geodiversity Site	Number	3	3	3	3	3	3	2	3
	Area	4,552	22,506	28,382	19,364	82,613	81,666	21,679	22,259
Quiet Routes	Number	0	8	9	9	12	11	5	7
	Length	0	2,146	4,091	976	6,950	6,396	61	70

Shop Survey 2015	Number	1	1	2	6	57	17	10	12
Special Landscape Areas	Number	1	1	1	1	1	1	1	1
	Area	12,549	64,988	89,611	75,247	504,496	323,472	85,102	87,645

Figure 04.10: City of Edinburgh Council Open Spatial Data Portal asset intersection under RCP 8.5, 95th percentile future erosion to 2050. Source: Evidence Report consultation response from University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026))

Figures 04.9 and 04.10 above show a range of asset types that are projected to be impacted by erosion, either by lying within the projected area of erosion (shown in the EA column) or adjacent to it (shown in the EI column). Units of length are in metres and area is in sq. metres. Bracketed values under 2100 represent the defended value for each particular asset (2100 is undefended). Bracketed values represent the defended value for each particular asset.

As can be seen in Figures 04.9 and 04.10 above, there are a range of asset types which would either lie directly in the modelled erosion area or in the vicinity of it. As expected, both the number and area of asset exposure increases over time. For example, Local Biodiversity Sites (LBS) become increasingly affected over the study period and, by 2100, would have a significant total area predicted to be directly within the erosion area (477,303 sqm in an undefended scenario and 288,471sqm in a defended scenario). Even in the shorter time frames of 2030 and 2050 LBS and a number of other assets will have a large increase in exposure. For example, Conservation Areas are projected to go from having 6,357sqm in the erosion area in 2030 to having 58,047sqm in 2050 (both undefended scenarios).

The Dynamic Coast 2 erosion disadvantage webmap provides useful context in this regard, utilising data from the SIMD combined with data from Dynamic Coast 2 on coastal erosion.

Figure 04.11: Dynamic Coast 2 erosion disadvantages map showing the Council area coastline

The darker the colour yellow shown on the coastal buffer zone above then the greater the level of coastal erosion disadvantage i.e. where social vulnerability to coastal erosion intersects with predicted erosion hazard extents. The main extent of Edinburgh's coastline which is projected to be at greatest erosion disadvantage is towards Portobello.

Coastal flood risk

Coastal flood risk is projected to be adversely impacted by climate change due to a range of compounding factors, including but not limited to sea level rise and erosion. CRSES Coastal Change Assessment – South East Scotland combined coastal flood risk data with information on coastal assets to show the vulnerability of Edinburgh's coastline to coastal change. Figure 04.12 below illustrates the extent of risk exposure for selected assets under different flood risk scenarios, including medium likelihood (1 in 200 year flood risk) with and without climate change.

Edinburgh OpenData Assets SEPA Intersection					
Assets	**Unit**	**L**	**M**	**MCC**	**H**
Special Landscape Areas	Number	2	2	2	2
	Area	7,653,837	7,610,083	7,708,129	7,553,893
Quiet Routes	Number	9	8	12	8
	Length	2,488	2,005	3,611	1,092
Conservation Areas	Number	6	6	6	6
	Area	771,347	750,832	882,578	721,832
Local Geodiversity Site	Number	4	4	4	4
	Area	874,136	867,155	882,827	856,671
Local Biodiversity Sites	Number	7	7	8	7
	Area	274,252	229,554	333,157	163,667
Tramlines	Number	1	1	1	1
	Length	68	68	225	62
Tram stops	Number	0	0	1	0
Business and Industry Area	Number	1	1	1	1
	Area	274,636	269,939	285,365	261,519
Landfill Areas	Number	5	5	5	5
	Area	151,080	150,399	151,827	148,931
Shop Survey 2015	Number	6	4	38	1

Figure 04.12: City of Edinburgh Council Open Spatial Data Portal asset intersections with SEPA coastal flood likelihoods (L = low likelihood flood event with a 0.1% chance of happening in any one year, M = medium likelihood with 0.5% chance in any one year, MCC = medium likelihood plus climate change allowance, H = high likelihood with a 10% chance in any one year). (source: University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026))

The table shows an increasing number/area of assets predicted to be affected as the likelihood of a given coastal flood event decreases but the severity that increases. For example, 2005m of identified low traffic walking and cycle paths or 'quiet routes' are predicted to flood in a medium risk coastal flood event with a 1 in 200 year return period compared to 1092m for a high likelihood event with a 1 in 10 year return period.

The column titled MCC relates to the medium likelihood to a medium risk event (1 in 200 year return period) with climate change allowance factored in. Such an event would affect more assets by number and area/length even compared to the most severe form of flood event under current climatic conditions which is shown in the third column titled 'L' for low likelihood event that could be expected once every 1000 years.

At Edinburgh's coast, these impacts would affect a wide range of assets, including shops, transport infrastructure as well as natural environment features.

CRSES Coastal Change Assessment – South East Scotland also provides longer term scenario modelling up for the year 2300, although this has a greater degree of uncertainty evidenced by the significant difference even between the two scenarios modelled.

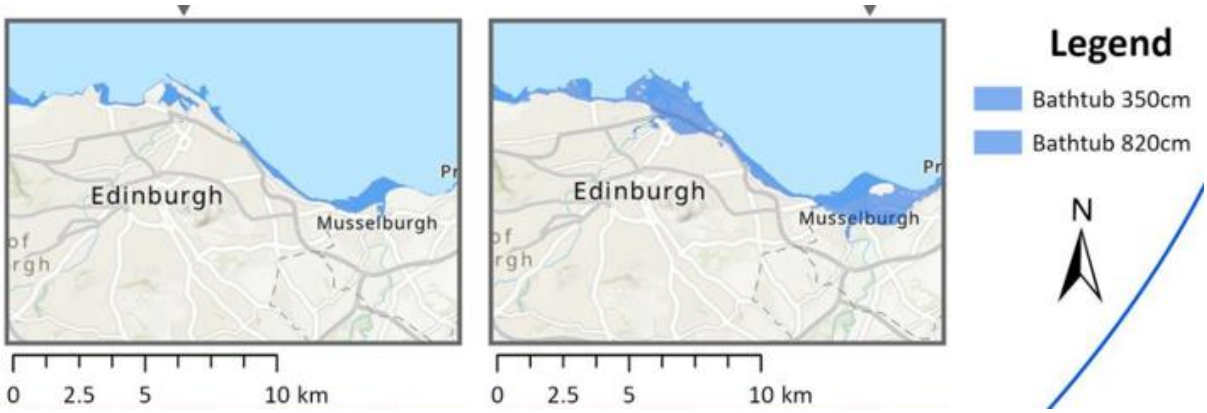


Figure 04.13: Future coastal flooding risks: bathtub scenario mapping (350 cm and 820 cm) (source: CRSES Coastal Risk Assessment - Southeast Scotland, Final Report 11/04/2025)

Under a 3.5m sea level rise scenario, parts of Portobello, Seafield, Leith docks and Granton harbour would be affected. Under a 8.2m sea level rise scenario the extent of this impact on these areas would be even greater. In addition, significant parts of Leith would be flooded as well.

The effect of these levels of sea level rise on selected key assets is set out in the tables below.

Edinburgh OpenData Bathtub Model 350 cm		
Assets	**Unit**	**City of Edinburgh**
Special Landscape Areas	Number	2
	Area	7,502,328
Quiet Routes	Number	5
	Length	651
Conservation Areas	Number	6
	Area	613,318
Local Biodiversity Sites	Number	6
	Area	92,771
Local Geodiversity Site	Number	4
	Area	845,554
Tramlines	Number	1
	Length	85
Business and Industry Area	Number	1
	Area	218,817
Landfill Areas	Number	5
	Area	129,060

Figure 04.14. Edinburgh OpenData asset intersection for coastal flooding in 2300 (Scenario C: 3.5 m SLR) (source: University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026))

The 3.5m sea level rise scenario shows a significant number of human and environmental receptors being affected, including Special Landscape Areas, Local Biodiversity sites and Conservation areas.

Edinburgh OpenData Bathtub Model 820 cm		
Assets	**Unit**	**City of Edinburgh**
Special Landscape Areas	Number	2
	Area	8,221,392
Quiet Routes	Number	21
	Length	9,698
Conservation Areas	Number	6
	Area	1,865,723
Local Biodiversity Sites	Number	13
	Area	908,548
Local Geodiversity Site	Number	4
	Area	960,113
Tramlines	Number	1
	Length	2,381
Tram stops	Number	4
Business and Industry Area	Number	1
	Area	1,260,976
Landfill Areas	Number	6
	Area	492,470
Shop Survey 2015	Number	305

Figure 04.15: Edinburgh OpenData asset intersection for coastal flooding in 2300 (Scenario H1: 8.2 m SLR). Source: University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026). Note: units of length in metres and area in sq. metres

As expected, the extent of receptors impacted by 8.2m level of sea level rise would be even greater than the 3.5m scenario. For example, 2381m of tramline would be affected under the 8.2m scenario compared to 85m under the 3.5m scenario. There would be a three-fold increase in the area of Conservation Areas impacted and a ten-fold increase in Local Biodiversity Site and Business and Industry Area impacted.

It is reiterated however that this scenario planning is over a significantly longer time frame and carries a greater degree of uncertainty. As a result, it is not proposed to use this evidence in the same manner as earlier 1:200 year flood risk with climate change allowance however it is still presented here as a relevant lens through which to consider longer term planning along the coast.

Options for response along different sections of the coast will be contained in the Council's Coastal Change Adaptation Plan (CCAP). Work on this is underway and is being undertaken in accordance with Coastal Change Adaptation Plan Guidance, for example using the main policy and policy subcategories set out in the guidance. Initial outputs from the CCAP are expected to be published in the coming year however and so will be able to be taken into account in the preparation of the Proposed Plan. As noted in Topic 01e Infrastructure - water and waste water, Scottish Water will be one of the key stakeholders involved with the development of the CCAP given the location of the Seafield waste water treatment works (WWTW) along the shoreline.

Summary of stakeholder engagement

Key Agency	**NatureScot**
Main views raised	• **Final Topic Papers (March 2026):** It would be beneficial to see evidence of existing SuDS provision and installations in Edinburgh including any existing provisions e.g. swales, ponds, rain gardens. Evidence of areas with limited SuDS coverage would also be useful. If this data is unavailable this should be listed as an evidence gap.
Council response and Implications for the proposed plan	The Council is currently undertaking a new open space audit (OSA) which will inform the next Open Space Strategy (OSS). The SuDS function of spaces will be assessed as part of this audit. The OSA and OSS will inform the plan.
Is the agency content with the evidence?	NatureScot does not dispute any of the evidence set out in the topic paper.

Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Use the OSA and OSS to inform the plan. This may involve informing both development proposals and green blue network proposals.

Key Agency	**SEPA**
Main views raised	• **Draft Topic Papers (Nov 2025):** This paper should refer to SEPA's River Basin Management Plan 3, particularly in relation to water classification and pressures. Queries and clarifications about the SFRA methodology were raised, including how this would inform the site appraisal process. Changes suggested, including the extents of flood studies done in relation to more specific catchment areas. Following this, the Council and SEPA agreed an amended approach to the SFRA and an updated methodology note to clarify some points which were not clear previously. • **Final Topic Papers (March 2026):** Maps showing SEPA's natural flood management (NFM) information should not be contained in the paper itself due to licensing restrictions. Instead, a link should be used. Otherwise, SEPA agree with all evidence presented within the topic paper. SFRA and Site Appraisal agreed amendments.
Council response and Implications for the proposed plan	NFM maps have now been removed and linked provided. An updated SFRA and supporting methodology has been produced in line with comments from SEPA. This updated SFRA and methodology note supports this topic paper. The SFRA now includes outlines of the three flood study areas for Edinburgh (Gogar Burn, Niddrie Burn and Water of Leith). More detailed information within these areas shall be

	used by the Council in its version of the SFRA but is not in the published version for sensitivity reasons given the need for professional interpretation to ensure accurate understanding. The flood study information can be shared with SEPA directly if desired. All information in this paper, including the SFRA, shall be used to inform the Proposed Plan. This includes the site appraisal process where issues such as flood risk will be informed by the SFRA.
Is the agency content with the evidence?	SEPA does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	SFRA and Site Appraisal methodology subject to final agreed changes.
Actions for proposed plan stage	The evidence in this topic paper, including the SFRA, will be used to inform the Proposed Plan and site appraisal process. The Council have committed to engaging SEPA on interpretation of flood risk in the site appraisal process.

Key Agency	**Scottish Water**
Main views raised	• **Draft Topic Papers (Nov 2025):** This paper should more comprehensively address surface water flood risk. The paper should also reference the National Flood Risk Appraisal (NFRA) and recognise NPF4 Policy 20 Blue and green infrastructure and National Development 5: Urban Sustainable, Blue and Green Surface Water Management Solutions as a national development. • **Final Topic Papers (March 2026):** Amend reference in table of flood risk figures (and reference in preceding paragraph) to National Flood Risk Assessment 2025.
Council response and Implications	The topic paper now addresses the NFRA and NPF4 policy 20 and National Development 5.

for the proposed plan	The topic paper also now more comprehensively addresses surface water management, including the nature of different opportunities to better manage surface water as part of developments and off-site. The updated information, in particular relating to how surface water can be better managed on-site as part of developments, as well as off-site, will help inform the preparation of the plan
Is the agency content with the evidence?	Scottish Water does not dispute any of the evidence set out in the topic paper. They have advised: 'We are in general agreement of the matters relating to our organisation within these topic papers.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council shall take account of the updated information and use this to help inform the preparation of the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** HfS does not dispute the evidence set out in this paper however a number of evidence sources are suggested with summary comments about what these sources are. Suggest use of ClimateXChange information as this takes a more pragmatic approach to flood risk assuming a lower level of global temperature rise and greater ability for new development to adapt to and mitigate the effect of climate change. HFS state that this can be secured through planning policy and for individual Construction Environment Management Plans submitted in connection with individual applications. This should be recognised in this topic paper. The approach used by SEPA is causing many brownfield sites to cease to be developable. Several areas surrounding water ways and coastline are identified in the topic paper at being of risk to flooding and erosion now and in the future.

	Evidence sources are also suggested in relation to how to interpret and identify the natural flood management opportunities. These evidence sources were originally mentioned in relation to Topic 6: Green blue infrastructure, open space and recreation but are addressed here as the more relevant topic paper. The Council should work with SEPA and landowners to identify opportunities for compensatory flood storage. New residential development presents the opportunity to implement these. Compensatory flood storage may allow areas identified as being at risk of flooding to be developed. Incorporating flood depth on public GIS mapping will assist in identifying areas that could potentially be brought forward for housing, subject to mitigation, particularly if a more pragmatic approach is adopted. The financial cost of providing or upgrading flood defences requires to be understood and where appropriate the 'fixing flooding problems' approach maintained rather than adopting the flood resilient approach.
Council response and Implications for the proposed plan	The natural flood management opportunities mapping are included in the topic paper. Further information sources are already referred to or are not considered applicable given existing sources listed (particularly with the dedicated Evidence Report guidance from SEPA). SEPA has not indicated that further evidence sources need to be referred to in their latest response to this topic paper. ClimateXChange is not considered in line with the precautionary principle that plans should take in relation to flood risk set out in NPF4. Similarly, the Council does not agree this topic paper should set out potential policy specifics that would also conflict with this precautionary principle. This paper sets out the potential for evidence to identify opportunities to reduce flood risk as part of developments. The Council agrees the specific opportunities will be better understood once potential development sites are known. The principle of providing additional water storage in areas with non-sensitive land uses is positive but overall

	proposals should still not increase flooding to themselves or elsewhere as per NPF4 policy 22 c(i). The comment about if/where flood defences should be provided, maintained or upgraded does not relate to the evidence base itself. As noted in the comment, consideration of this will vary by context and instead would be better made at the point that the Proposed Plan considers these issues, as well as the CCAP.
Is the agency content with the evidence?	HfS do not dispute the evidence, but suggest alternatives as set out above.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will consider all relevant information available in consideration of strategy and sites.

Other engagement and matters raised

Draft Topic Papers (Nov 2025):

University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast
Feedback on draft topic papers was sought from University of Glasgow/Climate Ready South East Edinburgh/Dynamic Coast who provided selected information relating to coastal change and adaptation drawing upon the Climate Ready South East Edinburgh Coastal Risk Assessment – Southeast Scotland.

Information on coastal flood risk, sea level rise and the observed and projected extent of coastal erosion under different scenarios was provided along with modelling of how this would impact on a range of receptors.

Recommendations that more directly relate to the content of the Proposed Plan, CCAP, Local Flood Risk Management Plan and Development Management stages of planning process are not addressed in this paper but would be welcomed as applicable to those strategies and processes. This includes recommendations relating to coastal relocation.

It is highlighted that research is being developed with more up to date data on vulnerability indicators that will be dynamically weighted. This will then be combined with climate risk data from CRSES to identify priority places where higher risk overlaps with lower community resilience.

The consultation response also recommended for all new coastal development or redevelopment the continued use of coastal buffers to reduce exposure of assets to coastal flooding and that erosion and linear easements are included as a requirement in new developments.

Light urbanism approaches using demountable development is suggested to help maintain economic productivity in the period between the present day and when coastal erosion and flooding risks to assets necessitate relocation or higher defences. These include the use of demountable buildings which are designed to be relocated once the climate change risks are too high.

British Geological Society

The British Geological Society has suggested a range of its information is relevant to a range of topic papers. The information suggested in relation to infrastructure - water and waste water, climate mitigation and climate adaptation has been addressed in the relevant topic papers. For this topic paper, the information suggested is welcomed however alternative information suggested by SEPA has been used instead as this is considered sufficiently detailed for LDP purposes. In addition, some of the information suggested has a cost associated with accessing it that makes it unsuitable.

Summary of implications for the proposed plan

The evidence demonstrates that Edinburgh has many areas that are at risk of flooding, including some at significant risk. The Council will use tools including the SFRA, SEPA modelling and other sources to consider how the Proposed Plan should respond. This includes proposing development in suitable locations with development principles to mitigate and improve flood risk and water management and utilising spaces such as flood plains and existing open spaces for nature-based solutions for drainage and water management providing multifunctional benefits,

Flood risk

The SFRA produced for this Evidence Report represents the ‘baseline SFRA’ setting out the varying types of risk and their severity, including whether the identified flooding represents a critical risk and unlikely to be suitable for development.

The baseline SFRA will be used to inform the site appraisal methodology by indicating what level of constraint flooding poses to a site’s development as part of a traffic light rating system. SEPA shall be consulted at the site appraisal stage for their input on whether the appropriate level of flood risk constraint has been attributed to a site.

For potential development sites, the SFRA will be used to provide recommendations as to where site specific FRAs are needed. The Proposed Plan shall incorporate the

recommendations of the SFRA in site allocations, for example, as development principles.

SEPA flood layers used for the SFRA are indicative and do not always include the latest climate change allowance. The Council shall still consider flood risk in areas adjacent to known flood risk areas in line with the precautionary principle, NPF4 and SEPA guidance.

The Proposed Plan shall use SEPA's Natural Flood Management mapping to recognise, explore and potentially identify possible opportunities to improve run-off reduction, floodplain storage and sediment management, for example where development sites or green blue network proposals can be used to appropriately naturalise watercourses. These should also have other benefits too such as those for biodiversity and climate resilience.

Strategic flow paths and water management opportunities

The Strategic Green Blue Network, forthcoming Surface Water Management Plan and SFRA can help identify potential water management opportunities for the Proposed Plan, in particular, ways to use green blue infrastructure within development sites that maximises multifunctional benefits e.g. biodiversity.

The possibility of including proposals for improving water management in other locations outside of development sites will be explored in the Proposed Plan process. This may include the use of green blue infrastructure like raingardens or swales along streets or open spaces for water storage. This is addressed further in Topic 06: Green blue infrastructure, open space and recreation.

Potential geomorphic risk will be taken into consideration as part of the Proposed Plan site appraisal.

Water quality

The Proposed Plan will consider surface water and ground water quality mapping and explore land use and nature-based solutions that improve ground water quality and reduce the amount of polluted water discharging into watercourses and polluting groundwater.

Coastal change and development

The Proposed Plan shall be informed by the emerging CCAP as well as information from Dynamic Coast 2 and CRSES, including in relation to erosion, sea level rise and flood risk. The Proposed Plan and CCAP will consider the social and environmental impact of coastal change, including differential impacts in relation to vulnerability.

The Proposed Plan will consider coastal change in multiple ways, including when considering the spatial strategy, infrastructure, new development allocations and if/how space for coastal change should be accommodated.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

05: Biodiversity

Topic	**05: Biodiversity**
Description of topic	A review of the state in biodiversity in Edinburgh, including species, habitats and networks of particular relevance; including initial view of implications for Proposed Plan
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15 (5) - The principal physical and environmental characteristics of the district.
Relevant NPF4 Policies	• Policy 1 Tackling the climate and nature crises • Policy 3: Biodiversity • Policy 9 Brownfield, vacant and derelict land and empty buildings

Local Development Plan Guidance	National Planning Framework 4 states that Local Development Plans should:
	• protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy.
	• promote nature recovery and nature restoration across the development plan area, including by:
	  ○ facilitating the creation of nature networks and strengthening connections between them to support improved ecological connectivity
	  ○ restoring degraded habitats or creating new habitats; and,
	  ○ incorporating measures to increase biodiversity, including populations of priority species.
	The Local Development Plan Guidance (Page 40) recommends that the Evidence Report considers species, including priority species, and habitats within the plan area and take into account relevant plans, audits and strategies.
	It further notes that local areas of importance for biodiversity may be identified, with cross referencing made to relevant data contained in other sources, such as the Open Space Strategy and Forest and Woodland Strategy.

Linked Topic Papers	• Topic 02 Natural places • Topic 03 Green belt, countryside and rural

	• Topic 04 Water Management, flood risk and coastal development • Topic 06 Green blue infrastructure, open space and recreation • Topic 08 and 09 Climate change and climate mitigation • Topic 19 City, town, local and commercial centre • Place Profiles
List of and links to evidence	• **CD204** Scottish Biodiversity Strategy to 2045, Scottish Government, November 2024 • **CD202** Scottish Biodiversity Delivery Plan 2024 - 2030, Scottish Government, November 2024 • **CD665** State of Nature Scotland 2023, State of Nature Partnership, 2023 • **CD203** Scottish Biodiversity List, Scottish Government, December 2025 • **CD578** Species at Risk Database, NatureScot, November 2024 • **CD664** Birds of Conservation Concern 5, Stanbury et al, 2021 • **CD406** Wetland Bird Survey, British Trust for Ornithology • **CD407** Wader Sensitivity Map, British Trust for Ornithology and Working for Waders • **CD603** Swift Mapper, RSPB • **CD401** Plant Atlas 2020, Botanical Society of Britain and Ireland, 2023 • **CD110** Scotland's National Marine Plan: A Single Framework for Managing Our Seas, Scottish Government, March 2015 • **CD195** Scotland's First Marine and Coastal Restoration Plan, Scottish Government, December 2025 • **CD576** Priority Marine Features, NatureScot, 2020 • **CD580** National Biodiversity Network Atlas, NBN Trust, 2025 • **CD526** INNS Mapper, INNS Mapper • **CD200** Scotland's Wetland Inventory, Scottish Government, 2017 • **CD408** Identifying Open Mosaic Habitat, Buglife, 2020 • **CD573** Natural Capital Tool, NatureScot • **CD574** Nature Networks Framework, NatureScot, November 2024 • **CD579** Nature Networks Toolbox, NatureScot and Scottish Government, 2026 • **CD409** John Muir Pollinator Way B-Line, Buglife, March 2016

- **CD165** Measuring Biodiversity: research into approaches, Scottish Government, September 2023
- **CD184** Planning Guidance: Biodiversity, Scottish Government, December 2025
- **CD571** Guidance on the Use of Existing Metrics in the Scottish Planning System, NatureScot
- **CD569** Developing with Nature Guidance, NatureScot
- **CD564** Urban Greening Factor for England User Guide, Natural England, January 2023
- **CD623** Obstacles to Fish Passage, SEPA, 2019
- **CD427** Aerodrome Safeguarding Advice Note 3 – Wildlife Hazards around Aerodromes, Combined Aerodrome Safeguarding Team, April 2024
- **CD468** Central Scotland Green Network Delivery Plan 2020 - 2030, Green Action Trust, November 2020
- **CD567** Central Scotland Green Network Habitat Connectivity Map, NatureScot
- **CD253** Biodiversity Duty Report 2021 - 2023, City of Edinburgh Council, 2024
- **CD350** Report to Policy and Sustainability Committee 20 April 2021 - Edinburgh Declaration on Biodiversity, City of Edinburgh Council, April 2021
- **CD351** Report to Policy and Sustainability Committee 22 August 2023 – Declaring a Nature Emergency, City of Edinburgh Council, August 2023
- **CD239** 2030 Climate Strategy Update, City of Edinburgh Council, October 2025
- **CD265** Climate Ready Edinburgh Plan 2024-2030, City of Edinburgh Council, August 2024
- **CD084** Edinburgh Biodiversity Action Plan 2022 - 2027, Edinburgh Biodiversity Partnership and City of Edinburgh Council, 2022
- **CD288** Edinburgh Biodiversity Action Plan: Annual Report 2025, Edinburgh Biodiversity Partnership and City of Edinburgh Council, 2026
- **CD670** The Wildlife Information Centre, The Wildlife Information Centre, 2024
- **CD443** Notable and Rare Species in Edinburgh, Edinburgh Biodiversity Partnership, 2022
- **CD479** City of Edinburgh Council Habitat Survey, Heritage Environment Ltd, 2003
- **CD034** Habitat Mapping Project Overview, City of Edinburgh Council, March 2026
- **CD035** City of Edinburgh Habitat Survey Report, WSP Ltd, December 2025
- **CD540** Open Mosaic Habitat Designation in North Edinburgh, Matthew Edwards, Edinburgh Living Landscapes & RBGE, July 2016

- **CD293** Edinburgh Nature Network, City of Edinburgh Council
- **CD652** Edinburgh Living Landscape, Scottish Wildlife Trust
- **CD294** Edinburgh Nature Network – Live Tracking, City of Edinburgh Council
- **CD295** Edinburgh New Gardens - Urban Nature Restoration Investment Scheme, City of Edinburgh Council, October 2025
- **CD441** Biodiversity Strategy, Edinburgh Airport, 2024
- **CD478** Edinburgh Campus Biodiversity Action Plan, Heriot Watt University, 2020
- **CD581** Biodiversity Action Plan 2025-2035, NHS Lothian 2025
- **CD100** National Planning Framework 4, Scottish Government, February 2023

List of matters covered

Biodiversity is the variety of life on earth and underpins a number of ecosystem services by providing food, raw materials, clean air and water, nutrient cycling and other essential services. Edinburgh has a wide diversity of habitats and nature rich places, from the Pentland Hills to the Firth of Forth, the dramatic geology of Arthur's Seat to river corridors such as the Water of Leith.

This topic paper considers the evidence in relation to biodiversity and the nature crisis to inform the Proposed Plan. The paper is structured to provide the following information:

- Legislation
- Strategic Context
- Species
- Habitats
- Nature Network
- Securing Positive Effects for Biodiversity

Details on nature conservation designations are provided in Topic 02 Natural places.

Summary of evidence

Legislation

Under the Nature Conservation (Scotland) Act 2004, the City of Edinburgh Council has a duty to further the conservation of biodiversity when carrying out its duties. The Wildlife and Natural Environment (Scotland) Act 2011 introduced a requirement for

all public bodies to publish a report on their compliance with the Biodiversity Duty every three years.

The most recent report is the City of Edinburgh Council Biodiversity Duty Report 2021 – 2023. The Council's Planning service plays a key role in delivery of this duty, as lead partner in the Edinburgh Biodiversity Action Plan. The Duty Report highlights the collaborative approach taken to protecting and enhancing biodiversity, and the work undertaken to date to mainstream biodiversity across Council services.

The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) (the Habitats Regulations) require all competent authorities to consider whether a plan could affect a European Site before it can be authorised. Information on European Sites and the implications for the Proposed Plan, including discussion on the Habitats Regulations Appraisal, can be found in Topic 02: Natural places.

Strategic Context - National

Scottish Biodiversity Strategy

The Scottish Biodiversity Strategy sets out Scotland's ambition to address the nature crisis, with the aim to be nature positive by 2030 and biodiversity to be restored and regenerated by 2045. This Strategy recognises the role of nature in delivering net zero and supporting climate change adaptation, a sustainable economy and thriving communities. It further highlights the commitment to deliver Nature Networks and create nature-rich urban environments to benefit both people and biodiversity.
The first Delivery Plan (2024 – 2030) sets out 6 objectives which consider the Intergovernmental Panel for Biodiversity and Ecosystem Services drivers of biodiversity loss within the Scottish context. Priority actions are grouped together under each objective and include:

- protect at least 30% of land and sea and ensure it is effectively managed to support nature by 2030 (30 by 30)
- identify and expand Nature Networks, with each local authority expected to have a spatially defined Nature Network
- champion new planning and development measures to protect and enhance biodiversity
- enhance biodiversity in urban green and blue spaces.

National Planning Framework 4

For the first time, the nature crisis together with the global climate emergency underpins the entire planning framework. NPF4 recognises that tackling the joint climate and nature crises are a priority, and nature recovery and restoration must be at the heart of future places. Emphasis is placed on habitat connectivity and nature networks as a key tool to deliver nature recovery and increase resilience to a changing climate. The Planning (Scotland) Act 2019 includes six statutory outcomes to be delivered through NPF4, including securing positive effects for biodiversity

(NPF4 Policy 3). The protection, restoration and enhancement of biodiversity therefore contribute to the aims of NPF4.

Scotland's National Marine Plan

The National Marine Plan is a cross-cutting policy framework which sets out policies and objectives to support development, activities and other interests affecting Scotland's marine environment, including territorial and offshore waters, whilst also recognising that many offshore activities have an onshore component. Relevant policies in the National Marine Plan include GEN9 Natural Heritage which recognises the value of the marine environment, including its biodiversity and geodiversity assets and supports protection and enhancement of the marine area. There are also relevant policies on invasive non-native species, marine litter, water quality and noise.

Development on shore must align with national and regional marine plans, where available. This is discussed in more detail in Topic 11 Water management, flood risk and coastal development.

Scotland's Marine and Coastal Restoration Plan

Scotland's Marine and Coastal Restoration Plan sets out actions to accelerate restoration of habitats and species in marine and coastal habitats. This came from a commitment in the Scottish Biodiversity Strategy and aims to prioritise restoration based on value and need, embed adaptive planning and better support communities and organisations to participate in restoration activities.

Regional

Central Scotland Green Network

The Central Scotland Green Network (CSGN) is an ambitious green infrastructure project covering 19 local authority areas across the central belt from Ayrshire to the Lothians. The CSGN was identified as a national development in NPF4 and will play a key role in tackling climate change and biodiversity loss, whilst contributing to nature networks and improving placemaking. This is further discussed in Topic 06 Green blue infrastructure, open space and recreation.

Local

Edinburgh Declaration and Nature Emergency

The Council signed the Edinburgh Declaration in 2021, an international agreement which recognises the essential role of local and regional governments in delivering biodiversity outcomes to help meet global targets as identified in the Global Biodiversity Framework.

The Council declared a Nature Emergency in 2023, recognising nature's value and the need for accelerated action to reverse biodiversity loss and support nature

recovery. This was fundamentally linked to the earlier Climate Emergency declaration. The Proposed Plan will explore how it can support the aims of the Edinburgh Declaration and take action to tackle the nature crisis, delivering action to protect, restore and enhance local biodiversity.

City of Edinburgh Council Climate Strategy and Climate Ready Edinburgh Plan

The Council updated its Climate Strategy in 2025, including a new chapter on the Nature Crisis. This recognised the need for the climate and nature crises to be tackled together and set out the Council's ambitions to become a climate resilient and nature positive city.

The updated Climate Strategy complements the Climate Ready Edinburgh Plan, adopted in 2024. This plan examined how our climate has already changed, and how it is projected to change in the future. Long-term projected climate trends for Edinburgh suggest:

- increased average temperatures
- typical summers will be warmer and drier and winters milder and wetter
- weather will remain variable and may become more variable.
- intense, heavy rainfall events will increase in both winter and summer.
- rising sea levels and increased coastal erosion
- less winter frost and snowfall.

The changing climate is placing additional pressure on biodiversity. The increasing occurrence and severity of climate change related events such as flooding, sea level rise, droughts and wildfires are expected to result in species and habitat change and loss, affecting their ability to survive and adapt. In the absence of action, climate change may also result in an increase in habitat fragmentation and the spread of invasive species, adding additional pressure on our species and habitats. To safeguard and enhance the natural environment, it is therefore essential that we embed adaptation and nature recovery into planning processes, land management plans, strategies and other projects.

Edinburgh Biodiversity Action Plan

The Edinburgh Biodiversity Action Plan (EBAP) is the main delivery mechanism for biodiversity conservation in the council area. The EBAP is prepared by the Edinburgh Biodiversity Partnership (EBP), which comprises over 30 organisations working for nature. The EBAP identifies priority species and habitats for the city, to support prioritisation of action. The latest EBAP (2022 - 2027) was published in November 2022, and sets out the shared vision for Edinburgh:

> *To make Edinburgh a greener city with more opportunities for wildlife, enabling people to engage with nature.*

This vision has now been incorporated into the updated Climate Strategy.

The most recent EBAP identified over 200 actions for nature, with a focus on those priority habitats and species that are considered to be of particular importance to the city. Many of these actions are directly relevant to the local development plan, such as:

- the inclusion of green infrastructure and nature-based solutions into new developments
- the requirement for the installation of Swift bricks and
- identification of opportunities for new greenspace and woodland creation
- promotion of the Edinburgh Pollinator Species mix for meadow creation in new developments.

The Council's Planning service has a lead role in coordinating the EBAP and actively works with partners to deliver and monitor these actions, working collaboratively with initiatives such as the Edinburgh Nature Network. Progress on actions is reported annually to the Policy and Sustainability Committee, most recently in March 2026.

The current EBAP will expire in 2027 prior to the anticipated adoption of the Proposed Plan. A review of the EBAP will be undertaken in 2026 and 2027, with a view to produce an updated Biodiversity Action Plan when the current EBAP ends, at the end of 2027. The Council will work closely with the Edinburgh Biodiversity Partnership to ensure that the Proposed Plan, Nature Networks and other relevant strategies are complementary to the vision and ambitions of the forthcoming EBAP.

Other Biodiversity Action Plans

Some land managers and organisations have produced biodiversity action plans to address the nature and climate crises on their own estates. These include:

- NHS Lothian's Biodiversity Action Plan 2025 – 2035
- Edinburgh Airport Biodiversity Strategy 2024
- Heriot Watt Edinburgh Campus Biodiversity Action Plan 2021.

These plans support the protection, restoration and enhancement of biodiversity and support our shared goals on nature and climate objectives. They also identify targeted actions which strengthen the Edinburgh Nature Network and support nature positive development.

Species

National

State of Nature Scotland (2023)

The State of Nature Scotland 2023 report summarises evidence of the twin climate and nature crises, confirming that Scotland is a highly nature-depleted country, where the abundance of species has declined on average by 15% since monitoring began in 1994 and one in nine Scottish species are now threatened with extinction.

This trajectory of decline is considered to be continuing despite increasing knowledge of the issues. Land use change and habitat fragmentation are identified as key pressures on biodiversity, exacerbated by climate change, pollution and invasive non-native species. This report, and the data behind it, provides vital information to help prioritise action to reverse this loss but recognising that nature recovery must be achieved simultaneously with sustainable development.

There is potential for the Council with the Edinburgh Biodiversity Partnership to target action towards particular species and habitats that are present within the council boundary. Northern Brown Argus, for example, is present at Holyrood Park and work has been undertaken to support connectivity to other suitable habitat through the inclusion of green roofs in new developments.

Scottish Biodiversity List

The Scottish Biodiversity List provides information on the species and habitats considered to be of principal importance for conservation in Scotland. This was most recently updated in 2025 and supports prioritisation of action to further the conservation of biodiversity.

Species at Risk Register

NatureScot's Species at Risk Register provides information on Scotland's most vulnerable species, collating data from across organisations into a central database. It contains all species that have formally been identified on the IUCN GB Red List, Birds of Conservation Concern or as a Priority Marine Feature.

Birds of Conservation Concern 5

At a national level, the British Trust for Ornithology (BTO) has published the Birds of Conservation Concern 5 (2021). This reviewed the extinction risk of all bird species for Great Britain, considering population trends, localised distribution, international importance and rarity.

Wading Bird Populations

Almost the entirety of Edinburgh's coastline is designated as a Special Protection Area (SPA) for its wading bird and waterfowl population. The Wetland Bird Survey monitors populations and trends of non-breeding waterbirds, including those identified as qualifying interests of the SPAs. Trends and headline figures are reported annually and together the dataset can provide invaluable information which underpins the Protected Areas designated for wintering waterbirds and can be used to consider the potential impact of development on these bird species.

The British Trust for Ornithology (BTO) wader sensitivity map uses Bird Atlas 2007 – 2011 data to model predicted relative abundances of ten species of wading birds. This map was created to inform tree planting strategies, however, provides useful data to inform the HRA of the proposed plan and guide development proposals where there may be HRA implications.

Swift Mapper

Swift Mapper was created following a project led by the Royal Society for the Protection of Birds (RSPB) and was developed with partners including Swift Conservation. This resource provides accessible swift records through an interactive map, including recorded sightings of occupied nests, previously occupied nests, nest boxes and screaming parties. Records in Edinburgh were supplemented through the Edinburgh Swift City project in 2021 - 2022 and supports targeted delivery of action. This can be supported by City Plan 2040 through the protection of existing nest sites and provision of enhancement measures where swifts are known to be present.

Priority Marine Features

Priority Marine Features (PMF) are a list of habitats and species of conservation concern in the marine environment. The list includes marine mammal species such as Bottlenose Dolphin, Grey Seal, Harbour Seal that occur in the Firth of Forth and fish species such as eel, that whilst only a PMF during the marine part of the cycle, are found in associated terrestrial waters such as the River Almond. There are also small areas of Seagrass near Cramond.

Plant Atlas 2020

The Botanical Society of Britain and Ireland (BSBI) published the Plant Atlas 2020 in 2023. This sets out the state of wild and naturalised plants based on 20 years of data and provides information on the distribution of 3,445 plant species across Britain and Ireland. This project identified four key trends:

- Native plants are declining due to human impacts including climate change.
- Non-native plants now outnumber native plants in the wild.
- Many non-native plants have become invasive, outcompeting native species
- Many montane plants have declined due to climate change.

The information contained in Plant Atlas 2020 may provide useful information to inform ecological baselines for both site allocation and developments. It may also provide useful information to guide habitat restoration and creation through the Nature Network and strategic landscape scale restoration and also support tree planting initiatives to be detailed within the Forest and Woodland Strategy as discussed in Topic 02 Natural places.

Local

The Wildlife Information Centre

The Council has a Service Level Agreement with The Wildlife Information Centre (TWIC), which is the Local Environmental Records Centre for Edinburgh. This affords access to the most comprehensive database of high-quality, high-resolution biodiversity data for the plan area. The National Biodiversity Network (NBN) Atlas also provides species information, but generally at a lower resolution to those provided by TWIC.

Species information held by both TWIC and NBN improves our understanding of species distribution across the council area, and provides an important evidence base to support decision making. This is very important to inform ecological baselines of development sites, support biodiversity enhancement and guide landscape scale restoration. For the Proposed Plan, it will provide valuable context for site allocations, identifying those sites that may need additional protection due to the presence of particular species or may form an important part of a habitat corridor to support connectivity and species movement across the council area.

Local Priority Species

Identifying trends and change in biodiversity at the local level, including species abundance and distribution, is a challenge. Ongoing discussion and analysis with local taxonomic experts has resulted in the current Priority Species list for the city which includes notable and rare species. This will be reviewed to coincide with the next edition of the Edinburgh Biodiversity Action Plan and thereafter will be used to inform site level protection and enhancement as development comes forward where priority species are found to be present or the habitat on site could potentially support priority species in the future.

Invasive Species

Invasive non-native species (INNS) can threaten our biodiversity, by disrupting native and naturalised ecosystems, transmitting disease and acting as a driver of biodiversity loss. Some records of invasive non-native species, particularly for Himalayan Balsam, Japanese Knotweed and Giant Hogweed, are available from the NBN Atlas and through our Service Level Agreement with TWIC. Further records are available through INNS Mapper, which is an accessible tool to support accurate recording of INNS. Action is being taken by the Council, partners and land managers such as the Water of Leith Conservation Trust to collect distribution data and undertake control in some of these areas. The Proposed Plan could further influence measures to control the spread of INNS.

Habitats

Edinburgh supports a wide range of habitats. These are important for their nature conservation value, provisioning services, and their amenity value.

National

Scottish Wetlands Inventory

Wetlands provide habitat for a number of Scotland and Edinburgh's priority and protected species, as well as supporting sustainable water management and climate adaptation. SEPA's Scottish Wetlands Inventory provides information on the distribution and characteristics of known wetland habitats.

Peatland

Peat soils are discussed in more depth in Topic 02 Natural places and Topic 08 and 09 Climate change and climate mitigation. In addition to the soil and carbon sequestration potential, this resource also has high biodiversity value supporting a variety of habitats and species. Much of the peatland habitat within Edinburgh is in the Pentland Hills Regional Park.

Local

City of Edinburgh Habitat Data

A phase 1 habitat survey of the entire City of Edinburgh Council area was undertaken in 2001 and 2002. This provided a snapshot of the habitats present within the council area and provided habitat information to inform policy development. The 2002 habitat survey showed that Edinburgh contains many Habitats of Principle Importance (HPI), as defined by the Scottish Biodiversity List.

The survey identified 62 habitat types in the City of Edinburgh Council area, ranging from the inter-tidal and coastal habitats of the Firth of Forth to the predominantly urban habitats of the City of Edinburgh, and from the lowland habitats of Rural West Edinburgh to the unenclosed upland habitats of the Pentland Hills. Intensified agricultural land (arable and improved grassland) and built-up land represented the main habitats (31.3% and 27.2% respectively), and amenity grassland accounted for 9.1%. All semi-natural habitats together accounted for approximately 32.4% of the total Council Area.

In a Lothian context, the City of Edinburgh Council area was found to support rare and/or extensive examples of the following habitat types: scrub (particularly Gorse Ulex europaeus), acid grassland (lowland examples), neutral grassland, calcareous grassland, dry and wet dwarf-shrub heath, raised bog, swamp, inter-tidal mud/sand, inland cliff (acid neutral) and inland cliff (basic).

This habitat data is now 23 years old. Given the current interlinked climate and biodiversity crises, it is considered necessary to update the habitat survey data to inform development of policy for the Proposed Plan and beyond. This data could be used for baselining the status quo of habitat area and condition in the council area, informing management plans, and defining key policy objectives, including the definition of the Nature Network (refer to Nature Network section below).

The Council is in the process of creating a new habitat map for the council area. This project is ongoing. The habitat map is based on a draft baseline habitat map created by NatureScot using the EcoServR method, as part of the NatureScot Natural Capital Tool. The Council is updating this map with recent local habitat data. The data used to update the map will come from:

- habitat surveys of key areas of HPI being carried out by WSP in 2025, to inform the Proposed Plan

- habitat surveys carried out by CEC Biodiversity Officers in 2025, to inform the Proposed Plan
- habitat surveys carried out by The Wildlife Information Centre (TWIC) on behalf of CEC in the past 10 years
- habitat data from Edinburgh Biodiversity Partnership Partners from the past 10 years
- other online data sources, such as the Native Woodland Survey of Scotland.

A habitat map methodology document has been produced, to outline the process used to create the map and select polygons for updated survey.

The Habitat Mapping project is expected to be completed in Summer 2026. Key outputs of the project will include a summary of the different habitat types present, and integration of the findings into other key evidence and policy areas, such as Nature Networks. For example, the rarity or decline of certain priority habitats may increase the emphasis on their conservation within Nature Networks and other policy items. This information will also help to inform potential site allocations, and possible identification of new Local Nature Conservation Sites. The timing of this work will allow it to feed into the Proposed Plan preparation,

Open Mosaic Habitat on Previously Developed Land

NPF4 Policy 9 promotes the reuse of brownfield, vacant and derelict land, with consideration given to the biodiversity value of this land when determining if this reuse is sustainable. Information on determining the biodiversity value of this land has been produced by Buglife.

Open Mosaic Habitat on Previously Developed Land (OMHPDL) is on the Scottish Biodiversity List as a habitat of principal importance and is also a priority habitat in the Edinburgh Biodiversity Action Plan, recognising the value of this diverse habitat for supporting a rich variety of invertebrates and other species.

Buglife in partnership with the Council and Edinburgh Living Landscape undertook a study of open mosaic habitat in North Edinburgh in 2016, with 18 sites identified as potential OMHPDL and a further 23 sites which showed potential to develop into this habitat type. Many of these sites have since been developed or were allocated for development in City Plan 2030. This dataset would benefit from being reviewed to understand the current status of those sites surveyed in 2016, and any new sites which may have developed into Open Mosaic Habitat in the intervening years – this is an action with the current Edinburgh Biodiversity Action Plan to be completed before 2027.

Nature Networks

Nature Networks are a programme for Government and a key delivery mechanism of the Scottish Biodiversity Strategy. The SBS states that '*Nature Networks across our landscapes will underpin the resilience and health of species and habitats*.' Nature

Networks are embedded throughout NPF4. NPF4 Policy 3 Biodiversity states that LDPs should promote nature recovery by facilitating the creation of Nature Networks and strengthening connections between them. Nature Networks should be developed in accordance with the Nature Network Framework.

Regional Scale

In updating the Nature Network in Edinburgh and in preparation of the proposed plan, consideration will be given to the following regional networks:

Central Scotland Green Network (CSGN) Habitat Connectivity

The CSGN Habitat Connectivity map was produced in 2021 and predicts opportunity areas on a regional scale to support habitat connectivity. This takes into account part-way and maximum dispersal zones that an average species will travel from a habitat. The CSGN Habitat Connectivity map forms the basis of several Nature Networks within the CSGN area, and therefore awareness of this map and integration into the Council's Nature Network would support connectivity at a regional level. The CSGN has further been identified as a national development in NPF4. The Proposed Plan will therefore need to explore how to deliver on the CSGN through provision of local green and blue networks and open space.

Buglife B-Lines

The Buglife B-Lines specifically focus on insect pathways, creating and enhancing grasslands and wildflower meadows to support pollinators. The John Muir Way B-Line follows the John Muir Way, a long-distance route which passes through Edinburgh.

Local Scale

Edinburgh Nature Network

Edinburgh benefits from being one of the first authorities in Scotland to have a Nature Network. The Edinburgh Nature Network (ENN) was created during 2020 - 2022 as part of the Edinburgh Living Landscapes (ELL) project. This was a partnership project led by Scottish Wildlife Trust (SWT), City of Edinburgh Council and the University of Edinburgh, with input from many other partners. The ENN was developed as a long-term strategic approach to manage, restore and enhance the urban landscape of Edinburgh. It highlights opportunities to take action across the city, using natural solutions to address the threats of biodiversity loss and climate change. The main output from the ENN projects was a list of actions to undertake, to 'Connect', 'Create', 'Enhance', 'Restore' or 'Protect' biodiversity in Edinburgh. These actions are being completed by the Council and various partner organisations. Completion of targets can be monitored through the Actions Tracker.

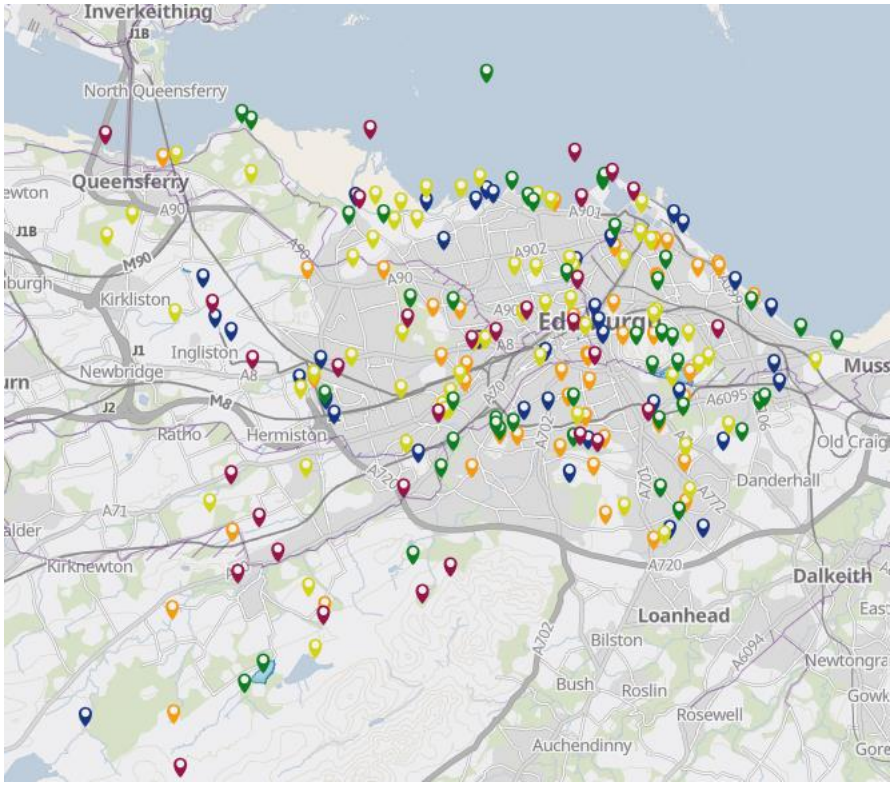


Figure 05.1: Edinburgh Nature Network Opportunity Map (source: Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack | © Scottish Wildlife Trust. Contains OS Data. © Crown copyright and database right 2024. Contains public sector information licensed under the Open Government Licence v3.0.)

The ENN is being implemented and is considered to be a successful programme. However, the ENN never produced a final network map showing the extent and typology of the Nature Network using polygons. Instead, the public mapping output of the project relied on point data, with each point showing a prescribed action at a general location. This means that there is currently no definitive map showing the exact area of the Nature Network. This is problematic when trying to identify the interaction of development management decision making and the Nature Network.

The Council is therefore looking to update the existing Nature Network and identify opportunities to strengthen ecological connectivity to support the Proposed Plan and fulfil NPF4 Nature Network obligations. This will consist of updating the previous ENN work and making amendments as necessary to create a spatially defined Nature Network compliant with the Nature Network Framework.

The revised Nature Network will be created over the next two years and is expected to be completed in draft by the end of 2026. A draft Nature Network methodology document is currently in preparation and is expected to be completed by mid-2026. It will build on existing partnership work and involve relevant internal and external stakeholders to improve connectivity and identify further opportunities to complement

existing and proposed actions. Engagement will also be undertaken with adjacent local authorities, to consider how the Council's Nature Network interacts to support the regional and national Nature Networks.

In outline, the proposed Nature Network will:

- Consist of two mapping stages:
    - Stage 1 will consist of a map of known features of biodiversity value, such as designated sites and Habitats of Principle Importance. Stage 1 features will be assigned typologies of 'Core Area', 'Corridor' and 'Stepping Stone' - consistent with the Nature Network Framework.
    - Stage 2 mapping will consist of Opportunity Areas. These will consist of refined 'Action' from the previous ENN work, as well as new opportunities identified through mapping exercises and workshops intended to be held in 2026.
- Address how the new Nature Network adheres to the Nature Network Framework
- Propose how the NN will interact with the Planning System.

Existing tools, such as the NatureScot Natural Capital Tool, will be used to support the identification of opportunity areas. This tool can display habitat networks for six habitat types – woodland, grassland, wetland and ponds are of most relevance in the urban setting. Consideration will also be given to the guidance contained within the Nature Networks Toolbox.

Additional mapping resources, such as those featured in SEPA's Planning Advice for Local Authorities – LDP Evidence Gathering: Achieving Sufficiency of Evidence Relating to Flood Risk and the Water Environment document, will be considered when creating the Nature Network opportunity areas. All evidence sources featured in the SEPA Planning Advice document will be considered, and where relevant will be used to inform the Nature Network. At this early stage, it is considered likely that the following mapping will be utilised in the Nature Network mapping:

- recommended riparian corridor
- riparian vegetation enhancement opportunities
- Scottish Wetland Inventory
- obstacles to fish migration
- Water Environment Fund projects
- natural flood management.

The Nature Network creation process will be undertaken in parallel with the development of the Proposed Plan, however, will remain separate in order to retain flexibility and provide the ability for the Nature Network to evolve separately from the plan process, if required. Flexibility is a core principle of Nature Network creation, as per the Nature Network Framework.

Positive Effects for Biodiversity

NPF4 Policy 3 introduced the requirement to secure positive effects for biodiversity. At a local level, City Plan 2030 policy Env 37 Designing in Positive Effects for Biodiversity requires proposals to include enhancement measures in addition to any mitigation required. The Council is actively engaging with NatureScot and the Scottish Government on biodiversity metric development and continue to liaise with other local authorities at a local, regional and national scale.

Approaches to Measuring Biodiversity in Scotland (Sept 2023)

A review of existing metrics across four policy areas (agriculture, conservation and biodiversity monitoring, natural capital markets and planning) was undertaken by SRUC on behalf of the Scottish Government. This project reviewed existing methodologies for the measurement of biodiversity and provided recommendations to allow for consistent assessment of biodiversity loss and gain across sites and sectors. A key finding was that Natural England's Biodiversity Metric (now the Defra Statutory Metric) could be adapted for use within Scotland's planning system, with adjustments made for Scottish habitats, condition assessments, and multipliers. This has subsequently informed the development of the Scottish Planning Biodiversity Metric, led by NatureScot, which is expected to be released in 2027.

Planning Guidance for Biodiversity (Dec 2025)

NPF4 Policy 3b requires national, major and EIA developments to demonstrate significant enhancement in addition to any mitigation or compensation required. There is currently no single agreed method to demonstrating positive effects for biodiversity.

The Planning Guidance for Biodiversity provides some guidance on implementing Policy 3b, recommending the use of a recognised tool or metric, such as the Defra Biodiversity Net Gain, Urban Greening Factor or Building with Nature Standards Framework. This approach was incorporated into the Edinburgh Design Guidance, adopted in September 2025.

Guidance on the Use of Existing Biodiversity Metrics in the Scottish Planning System

In the absence of a universally adopted biodiversity metric, NatureScot has provided additional guidance on the use of existing metrics particularly outlining the differences between the Defra metric used in England and the biodiversity toolkit developed by Scottish and Southern Energy Renewables. This builds on the work undertaken by SRUC and sets out general principles to demonstrate compliance with NPF4 Policy 3b for major developments. It further provides guidance on the information to be submitted with a planning application where a metric has been used to ensure consistency in decision making. The Proposed Plan will need to consider which tools are appropriate to demonstrate significant enhancements.

Developing with Nature Guidance

The Developing with Nature Guidance has been prepared by NatureScot to assist in the delivery of Policy 3c for local developments. This guidance includes information on measures that can be incorporated into development to support biodiversity enhancement. Measures range from wildflower meadows to bird and bat boxes, reflecting the policy requirement to include proportionate measures to the nature and scale of development. A Biodiversity Enhancement Plan template is also provided in the appendix, which is a useful tool for applicants to demonstrate the additionality of proposed enhancement measures.

Urban Greening Factor

The Urban Greening Factor is a tool developed in England to demonstrate green infrastructure improvements and is particularly useful in urban areas where the Defra metric may not apply. The Urban Greening Factor has not been specifically designed for biodiversity but supports wider environmental benefits and nature-based solutions which may also deliver for biodiversity, such as rain gardens and green roofs. The Urban Greening Factor was included in the Scottish Government's Planning Guidance for Biodiversity as an example of a metric that could be used to demonstrate positive effects for biodiversity. In preparing the Proposed Plan, the most appropriate tool to demonstrate policy compliance will need to be considered.

SEPA Obstacles to Fish Migration

Man-made barriers to fish migration, such as weirs, dams, culverts or bridges cut off access to river habitats for many fish species including salmon, sea trout, lampreys and eels. Removal of these is a priority for river basin management plans and may provide an opportunity to deliver positive effects for biodiversity where site allocations are adjacent to rivers with obstacles present.

Wildlife Hazards Around Aerodromes

When identifying appropriate enhancement measures, consideration must be given to design habitats that do not increase wildlife strike risk for aircraft. The Combined Aerodrome Safeguarding Team has produced a document which sets out the risk some wildlife (particularly birds) can have on aircraft safety. It further includes a list of design features (including certain habitats) which should be avoided on sites near airports and aerodromes. The Proposed Plan will need to have cognisance of this guidance should proposals be considered within the airport safeguarding zone.

Edinburgh New Gardens – Urban Nature Restoration Investment Scheme

The Council has undertaken work to investigate use of metrics and the potential opportunity to facilitate nature investment both through the planning process and as part of corporate environmental, social and governance responsibility. This work has been funded through the Facility for Investment Ready Nature in Scotland programme.

Key findings of this project suggest that use of an agreed metric, such as biodiversity net gain (or the forthcoming Scottish equivalent) would help streamline the delivery of positive effects for biodiversity and support the Council's ambitions towards nature restoration, contributing towards the wider nature recovery funding landscape. Larger sites would be more suitable for facilitating biodiversity net gain, which could be challenging in the urban environment. An aggregation of urban and peri-urban sites could be one option to resolve this. Further work will be undertaken into 2026 to develop understanding of metrics and potential financial models, including looking at comparative models used by other local authorities such as Greater Manchester. This work will inform the approach taken by the Proposed Plan on demonstrating biodiversity enhancement.

Summary of stakeholder engagement

Key Agency	**NatureScot**
Main views raised	**Scoping (May 2025):** NatureScot provided recommendations on evidence sources, including making reference to the Scottish Biodiversity Strategy, State of Nature Report 2023, Scottish Biodiversity List, National Biodiversity Network Atlas and Developing with Nature Guidance. Comments were also made about including some discussion on the risks and impacts to biodiversity and requested consideration be given to the role of peatland in supporting protected and varied habitats and species. **Final Topic Papers (March 2026):** Greater connection between the climate change and associated effects on biodiversity including increased temperatures, changing rainfall patterns, coastal changes and invasive species. Biodiversity and habitat protection should also be considered in implications for the proposed plan under temperature, flooding and drought.
Council response and implications for the proposed plan	The Council has included relevant evidence sources in the topic paper and considered implications for the proposed plan in the section below. Comments made around impacts of climate change on biodiversity have been incorporated into this topic paper, and considered in the implications for the Proposed Plan below.

	This has been cross-referenced in the climate change and climate mitigation topic.
Is the agency content with the evidence?	NatureScot have advised: 'We welcome the further information and the iterations that have been made to the evidence reports. As a result we are happy to offer our support on sufficiency of evidence work. The meetings we have had on specific issues were useful. And overall, from our perspective, the evidence papers represent a very strong body of work in preparation for the next stages of the process.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with NatureScot will take place in developing the Proposed Plan.

Key Agency	**SEPA**
Main views raised	**Scoping (May 2025):** No comments were made relating to biodiversity. **Draft Topic Papers (Nov 2025):** SEPA requested further discussion on the development of the Nature Network mapping, including confirmation of data sources that were considered and then discounted when producing the mapping methodology. **Final Topic Papers (March 2026):** A statement of agreement has been received, and it was noted that all recommended water environment evidence sources had been incorporated and will be considered as part of future Nature Network mapping.
Council response and implications for the proposed plan	The Council has included recommended evidence sources in the topic paper and will consider these when mapping the Nature Network. This will inform the Proposed Plan as discussed below.
Is the agency content with the evidence?	Previous comments have been taken into account. SEPA does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.

Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with SEPA will take place in developing the Proposed Plan. Include consideration of water environment sources when mapping the Nature Network

Key Agency	**Scottish Water**
Main views raised	**Scoping (May 2025):** No comments were made relating to biodiversity. **Draft Topic Papers (Nov 2025):** Scottish Water highlighted the multiple benefits of the blue green network to other topic areas, including biodiversity, and recommended strengthening connections between topic papers **Final Topic Papers (March 2026):** A statement of agreement has been received.
Council response and implications for the proposed plan	Increased cross-referencing between papers has been made to strengthen connections between topics.
Is the agency content with the evidence?	Scottish Water does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with Scottish Water will take place in developing the Proposed Plan.

Key Agency	**NHS Lothian**
Main views raised	**Scoping (May 2025):** No comments were made relating to biodiversity. **Draft Topic Papers (Nov 2025):**

	NHS Lothian identified the value in cross-referencing the NHS Lothian Biodiversity Action Plan to assist cohesion across agencies. **Final Topic Papers (March 2026):** No further comments relating to biodiversity received.
Council response and implications for the proposed plan	Organisational Biodiversity Action Plans have been included as sources of evidence, where these are publicly available.
Is the agency content with the evidence?	NHS Lothian does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with NHS Lothian will take place in developing the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	**Scoping (May 2025):** Provided a list of evidence and sources deemed to be relevant to this topic paper. **Draft Topic Papers (Nov 2025):** No comments received on this topic paper. **Final Topic Papers (March 2026):** Four sources of information were recommended relating to house building and the housing emergency. Five additional sources of information were recommended on specific biodiversity topics including guidance from NatureScot on the use of metrics and data on plant, bird and invasive species distribution. Issues were raised around the benefits of housebuilding and need to address the housing emergency. HFS members are fully committed to protecting biodiversity and already consider sustainability as an integral part of their

	business. Significant investment is often made in incorporating biodiversity improvement measures into new developments, ensuring that any opportunity to enhance biodiversity is seized. It is important that the presence of biodiversity on sites that are promoted for development does not preclude the site from being considered as suitable for being developed. Depending on the type of biodiversity, it can be incorporated into the design of any site layout and managed through a site factor or more specific interventions, such as a woodland management plan. Ecological management plans could also help manage dispersal areas for sensitive biodiverse areas within proposed housing developments.
Council response and implications for the proposed plan	The Council has included suggested relevant evidence sources in the topic paper and considered implications for the proposed plan in the section below. The commitment of housebuilders to biodiversity is welcome. The Council notes that biodiversity is one consideration when determining site suitability, and consideration of all relevant policies will be required though notes the significant weight that NPF4 Policy 1 gives to the climate and nature crises. Ecological Management Plans, and other mitigation measures, can be applied to manage impacts on biodiversity during construction. Local development plans are however required to follow the mitigation hierarchy when allocating sites, thus avoiding impact on sites of biodiversity value wherever possible. Sites with greater biodiversity value, including protected areas and Local Biodiversity Sites will therefore have greater requirements to merit consideration as an allocation. Issues around policy interaction and need to address the housing emergency have been addressed in the Housing Land topic.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.

Actions for proposed plan stage	The Council will continue to engage HfS in preparing the Proposed Plan.

Other engagement and matters raised

There have been internal discussions with the Climate and Nature, Biodiversity and Thriving Green Spaces services when drafting this topic paper. These will continue for the Proposed Plan process.

Summary of implications for the Proposed Plan

Species and Habitats

The evidence provides information on the important areas for nature across the council area. The evidence on species and habitat distribution across the city will assist with the potential identification of nature rich areas to designate as locally designated sites and/or form part of the Nature Network particularly considering their role in supporting ecological connectivity.

Consideration will be required of how the spatial strategy, proposals and policies within the Proposed Plan can help protect and enhance Edinburgh's locally identified natural heritage assets.

Data on wading birds will be used to inform the Habitats Regulations Appraisal of the Proposed Plan when considering likely significant effects on European Sites.

Retaining, protecting and enhancing existing biodiversity is a core aspect of NPF4 and it is anticipated that nature recovery will be an important theme to explore in the delivery of the Proposed Plan. Priority habitats identified at a local and national level will be prioritised for retention.

In the Proposed Plan, existing and future biodiversity and habitat protection should be considered within the context of a changing climate, including changes in temperature, rainfall patterns, flooding and drought. This can affect the distribution of existing species and habitats and can have an impact on the success of intervention measures including establishment and ongoing success of habitat enhancement.

Nature Networks

As per NPF4 and the Scottish Biodiversity Strategy, the Proposed Plan will need to consider facilitating the creation of a new Nature Network for Edinburgh. The Nature Network needs to be spatially identified, support improved ecological connectivity, restore degraded habitats, create new habitats and incorporate measures to increase biodiversity, including for populations of priority species. The identification of

a Nature Network will allow for spatial planning of nature recovery and will identify the best areas for nature conservation, and opportunity areas which could be utilised for enhancement and optimal expansion of the network.

The Proposed Plan will need to recognise the objectives of the Nature Network and consider how to support the conservation and enhancement of the Nature Network in accordance with NPF4, whilst also allowing for sustainable development in the correct locations. Nature Networks are an element of spatial planning which will need to complement other related elements of spatial planning. For example, the proposed Landscape Character Areas/Green Belt Review and Nature Networks would need to find balance and state similar objectives to avoid conflicts – for example, not proposing a Nature Network Opportunity Area that is incongruent with Landscape Character Area objectives.

Positive Effects for Biodiversity

The evidence on priority habitats and species will support opportunities for delivering positive effects for biodiversity, through policy development, site specific enhancements in site allocations and place briefs, and strategic approaches in some areas.

Whilst work is ongoing on a Scottish metric for major development, consideration will be required on an appropriate approach to demonstrate positive effects for biodiversity within the Edinburgh context.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

06: Green blue infrastructure, open space and recreation

Topic	**06: Green blue infrastructure, open space and recreation**
Description of topic	Review and analysis of implications of information on blue green infrastructure, open space, sport and play provision
Information required by the Act	**Section 15(5)** • the principal physical, social, and environmental characteristics of the district; and • the principal purposes for which the land is used. **Section 16D (1)** • a planning authority must assess the sufficiency of play opportunities in its area for children in preparing an Evidence Report. **The Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2023** set out the form and content of the Play Sufficiency Assessment (PSA); the persons who must be consulted in preparing the PSA; and the publication of the PSA. **Regulation 9** Have regard to: • any open space strategy.
Relevant NPF4 Policies	• Policy 2 Climate mitigation and adaptation • Policy 3 Biodiversity • Policy 4 Natural places • Policy 6 Forestry, woodlands and trees • Policy 14 Design, quality and place • Policy 15 Local living and 20 minute neighbourhoods • Policy 20 Blue and green Infrastructure • Policy 21 Play, recreation and sport
Linked topic papers	• Topic 01e Infrastructure - water and waste water • Topic 02 Natural places • Topic 03 Green belt, countryside and rural • Topic 04 Water management, flood risk and coastal development • Topic 05 Biodiversity • Topic 07 Zero waste, energy, heating and cooling • Topic 08 and 09 Climate change and climate mitigation • Topic 11 Design, quality and placemaking • Topic 15 Local Living • Topic 16 Health and wellbeing

	• Place Profiles
Local Development Plan Guidance	Policy 20 Utilise up-to-date blue and green infrastructure audits and/or strategies, relating to existing assets, networks and their multiple functions as well as priorities for connecting blue and/or green infrastructure, including across boundaries. This can include access rights and core paths, and areas with important role in flood water storage or conveyance as informed by a Strategic Flood Risk Assessment (SFRA). The audit can bring together other information such as Open Space Strategies, Forestry and Woodland Strategies, Play Sufficiency Assessments. Policy 21 The needs and demand in the community in relation to sports, play and outdoor recreation; and identifying existing and new sites for people of all ages. This should be informed by the planning authority's Play Sufficiency Assessment/Play Strategy, Sports Pitch and Open Space Strategy.
List of and links to evidence	• **CD312** Green Blue Network Map Viewer, City of Edinburgh Council • **CD301** Edinburgh's Green Blue Network storymap, City of Edinburgh Council • **CD033** City Plan 2030 – Written Statement, City of Edinburgh Council, November 2024 • **CD066** Non Statutory Guidance - Edinburgh Design Guidance, City of Edinburgh Council, September 2025 • **CD333** Open Space 2021: Edinburgh's Open Space Strategy, City of Edinburgh Council, December 2016 • **CD334** Open Space Audit, City of Edinburgh Council, December 2016 • **CD335** Open Space Audit 2016 mapping, City of Edinburgh Council, December 2016 • **CD336** Open Space Strategy Locality Action Plans, City of Edinburgh Council, March 2017 • **CD341** Play area Action Plan 2011-2016, City of Edinburgh Council • **CD339** Physical Activity and Sport Strategy for Edinburgh 2024 to 2034, City of Edinburgh Council, December 2024 • **CD361** Sports Pitch Strategy for Edinburgh 2025-2035, City of Edinburgh Council, 2025

- **CD287** Edinburgh as a Feminist City Working Group Update Committee Report 28 January 2026, City of Edinburgh Council, January 2026
- **CD211** Scottish Household Survey in 2022: Key findings, Scottish Government, December 2023
- **CD313** Growing Locally: Edinburgh's first food growing strategy 2021-2026, City of Edinburgh Council
- **CD382** Vision for Water Management in the city of Edinburgh, City of Edinburgh Council, November 2020
- **CD469** Scotland's Greenspace Map, Greenspace Scotland
- **CD3096** Edinburgh Outdoors webpage, City of Edinburgh Council
- **CD279** Cultivating Communities - A Growing Success The 3rd Allotments Strategy for the city of Edinburgh 2017 – 2027, City of Edinburgh Council
- **CD304** Edinburgh's Adopted Core Paths, City of Edinburgh Council
- **CD232** Scottish Index of Multiple Deprivation(SIMD), Scottish Government & Ordnance Survey, 2020
- **CD177** Planning Advice Note 65: Planning and open space, Scottish Government, June 2008
- **CD100** National planning Framework 4, Scottish Government, February 2023
- **CD161** Local Development Plan guidance 2023, Scottish Government, May 2023
- **CD412** Central Scotland Green Network - The Vision, Central Scotland Green Network, June 2011
- **CD086** Edinburgh 2050 – City Vision, City of Edinburgh Council, 2023
- **CD688** School Premises (General Requirements and Standards) Regulations 1967 (as amended), UK Government
- **CD036** Edinburgh Strategic Flood Risk Appraisal Webmap, City of Edinburgh Council, April 2026
- **CD629** SEPA Planning Advice Note for Planning Authorities – LDP Evidence Gathering: Achieving sufficiency of evidence relating to flood risk and the water environment, SEPA, December 2024
- **CD173** Physical Activity for Health Framework, Scottish Government, October 2024,
- **CD115** A More Active Scotland: Scotland's Physical Activity Delivery Plan, Scottish Government, June 2018
- **CD046** Play Sufficiency Assessment, City of Edinburgh Council
- **CD251** Allotments and community growing spaces in Edinburgh map, City of Edinburgh Council

List of matters covered

This topic paper considers the following in relation to:

- Legislation
- Strategic Context
- Species
- Habitats
- Nature Network
- Securing Positive Effects for Biodiversity

Summary of evidence

National

Place and Wellbeing Outcomes relating to movement and spaces are at the heart of the issue of recreation, open space and the blue green network.

Scotland's Physical Activity for Health Framework takes a cross-government, cross-sector approach to improve health outcomes and reduce health inequalities. The Framework sets out a clear vision of More People; More Active; More Often. Within the Framework, there are eight strategic cross cutting Delivery Outcomes, as shown in the diagram below. Addressing physical inactivity is integral to improving levels of population health and the document provides a preventative approach, to help ensure that the right collective actions are taken to create the conditions which enable people to live healthier lives.

Figure 06.1: Delivery outcomes (source: the Physical Activity for Health Framework)

A More Active Scotland: Scotland's Physical Activity Delivery Plan (2018) Scottish Government notes that the access to facilities, as well as our built and natural environments more widely combine to have a significant bearing on increasing active lifestyles.

Water resilient places states that 'by focusing on creating blue-green places that are sustainably drained and have low exposure to flooding impacts we can deliver multiple benefits for our communities, contribute to the National Performance Framework and help deliver Scotland's ambition for a robust, resilient wellbeing economy post-COVID19.' SEPA Planning Advice Note for Planning Authorities – LDP Evidence Gathering: Achieving sufficiency of evidence relating to flood risk and the water environment reiterates the requirement of NPF4 that relevant water environment evidence should identify opportunities to enhance nature networks and blue and green infrastructure.

The Evidence Report seeks to address all recommended information sources across relevant topic papers. Some of this, such as Scottish Wetland Inventory is addressed in this topic paper. Information relating to recommended riparian corridors, riparian vegetation enhancement, obstacles to fish migration and Water Environment Fund projects is addressed in Topic Paper 5 Biodiversity and will be included in the Nature Network to inform the Proposed Plan.

Evidence specified in the SEPA advice note relating to the water environment is addressed in Topic Paper 4 Water management, flood risk and coastal development. This includes natural flood management and outputs of the strategic flood risk assessment (SFRA) which itself includes information such as geomorphic risk.

Regional

The Central Scotland Green Network is a national development within NPF4. Central Scotland Green Network (CSGN) – The Vision sets out how the CSGN 'involves public agencies and stakeholders (those with an interest in our work) working together to align their policies, programmes and actions to achieve a common aim. That aim is to change the face of Central Scotland by restoring and improving the rural and urban landscape of the area.' For Edinburgh, this means it is key to ensure its Green Network considers this wider, cross-boundary context to maximise the benefits it can deliver.

Local Context

One of the 12 themes in Edinburgh 2050 – City Vision is for the city to be green and to have plenty of green spaces. Edinburgh's Open Space Strategy – Open Space 2021, similarly sets out that 'improving access to good quality green space for everyone across the city benefits health and wellbeing, supports urban wildlife and encourages investment in Edinburgh's economy.'

Through the Physical Activity and Sport Strategy for Edinburgh 2024-2034, the Council sets out plans to ‘increase the number of people who participate in physical activity and sport.’

Growing Locally: Edinburgh’s first food growing strategy 2021-2026 sets out in its vision that ‘residents, community groups and local business can access healthy, sustainable food locally, and are able to grow more food across a diverse range of sites within the city.’

A key objective in the Council’s Vision for Water Management is to ‘ensure a citywide approach to water management utilising an interconnected green/ blue network which will be developed and embedded into the Local Development Plan.’ The Vision emphasis the need to firstly manage water at source and the plot level, with another key principle being to manage water above ground.

Play

The City of Edinburgh Council provides 159 playgrounds, 37 ball courts, 9 wheeled sports areas (including pump tracks and skate parks), 4 table tennis areas, 1 climbing wall, 2 trim trails and 31 outdoor gyms. In addition, there are 41 private playgrounds. In total, 200 play areas were assessed.

Local authorities are required to produce a Play Sufficiency Assessment (PSA) under the Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2023 and need to consider both formal and informal play opportunities in terms of quality, quantity and accessibility, alongside meaningful engagement with users.

The Council has recently undertaken a PSA which forms a background paper to the Evidence Report. This PSA has audited and mapped all Council owned play areas and selected non-Council play facilities which are publicly accessible and can contribute to an area’s sufficiency of play provision. These play facilities have been visited and assessed to give them a ‘play value’ score based upon the range of activities that can be undertaken at the play area across the different equipment (e.g. sliding, balancing), and the range of different ages that each piece of equipment is likely to be used by. The greater the range of activities and age suitability the greater the score. Additional points are given for other factors like seating and other facilities. More information on methodology and scoring is found in the Council’s Play Area Action Plan 2011-2016.

These quality ratings for play areas then result in a categorisation of each play space location e.g. good, very good. Consultation and experience have shown children and families will walk further to access better quality spaces. This has resulted in the PSA defining a sufficiency of access to play space as being any homes within:

- 800m walking distance of a space with a ‘good’ value, or
- 1200m walking distance of a space with ‘very good’ value or
- 2000m walking distance of a space with ‘excellent value’

Based on this system, mapping was produced that established which areas of the city were adequately served. This considered actual walking/wheeling routes from residential address points to the relevant play spaces by using the Council's street network and address point data. This methodology has been kept from the previous PSA (2016) to allow benchmarking over time.

Over half (53.5%) of the playgrounds audited are "Fair" and there whilst there is a very limited number of playgrounds that have a "Very good" or "Excellent" value, many residents have access to playgrounds rated 'Good' or above. Overall, the PSA found that the proportion of homes in the Council area that met the above standard was 81%. This compares with 76% in the 2016 PSA. However, there are still areas within the local authority that are not served by this standard.

The 2026 PSA shows that the Council area now contains three playgrounds achieving an excellent rating, whereas previously it only had one. A key improvement in play provision since 2016 that has contributed to this has been the upgrading of two additional play areas to meet the excellent standard (Leith Links and Saughton Park). These new excellent standard play facilities are located to the north-east and west of the city to better address previous deficiencies in these areas and form a well-spaced network of excellent standard play spaces from east to west when combined with the existing excellent play space centrally located at the Meadows.

This ability to target and prioritise improvements to play provision to achieve greater levels of benefit to underserved communities demonstrates the benefit in undertaking a PSA which has a comprehensive audit and assessment process. It is intended to use the 2026 PSA in a similar manner to identify and prioritise future improvements.

The 2026 PSA has added an additional suite of criteria focused around assessing accessibility and suitability of play facilities for children and young people with disabilities to establish how inclusive playgrounds and play equipment are. The principles incorporated into this approach were based upon engagement with disabled children and their carers.

The results from the 2026 PSA note that 'in terms of inclusion, only three playgrounds are supported by Changing Places facilities, and the availability of high-quality inclusive play equipment remains limited, indicating clear scope for improvement.'

For the 2026 PSA, significant engagement has taken place with children, young people, parents and carers across the city. What engagement took place and its findings are outlined in the PSA. The findings show that for young people, there needs to be more things to do in the spaces, spaces designed with their age group in mind with improved quality, maintenance and facilities. Discussions also revealed differences in preferences, with younger teen boys often advocating for more

accessible football facilities, while girls emphasised the importance of safe and comfortable places to socialise.

The City of Edinburgh Council established a Feminist City Short Life Cross-Party Working Group to ensure gender equity is central to land use planning and the management and design of public spaces. The most recent report on this in January 2026 notes the steps taken to ensure that women's safety is a key consideration. Design considerations must also include the need to ensure gender equality in the layout of public spaces. For example, the design of recreation and play space for women and girls as well as traditional sports pitches and play equipment, design of social spaces for use by women and girls and design for movement to be inclusive by mode and space.

The new PSA will be used in conjunction with the Place Profiles to assess play provision within a local area and how well children and young people can live their lives locally. The plan will explore improvements to play provision so children and young people including girls and those will disabilities have access to an appropriate quality and quantity of play opportunities that meet their needs.

Sport

The City of Edinburgh Council recently adopted its Physical Activity and Sport Strategy (PASS) for Edinburgh 2024 to 2034 in December 2024. This identifies key priorities and measures to address these. Many of these are organisational in nature and not spatial matters for planning, however there are some which are noted below as more relevant.

The PASS identifies the need to 'explore opportunities to support and maximise community access to physical activity in learning spaces such as school sports facilities and other Higher Education/ Further Education spaces.'

The Council has produced a Sports Pitch Strategy 2025-2035. This has mapped and assessed pitch provision across the city and is shown in the figure below.

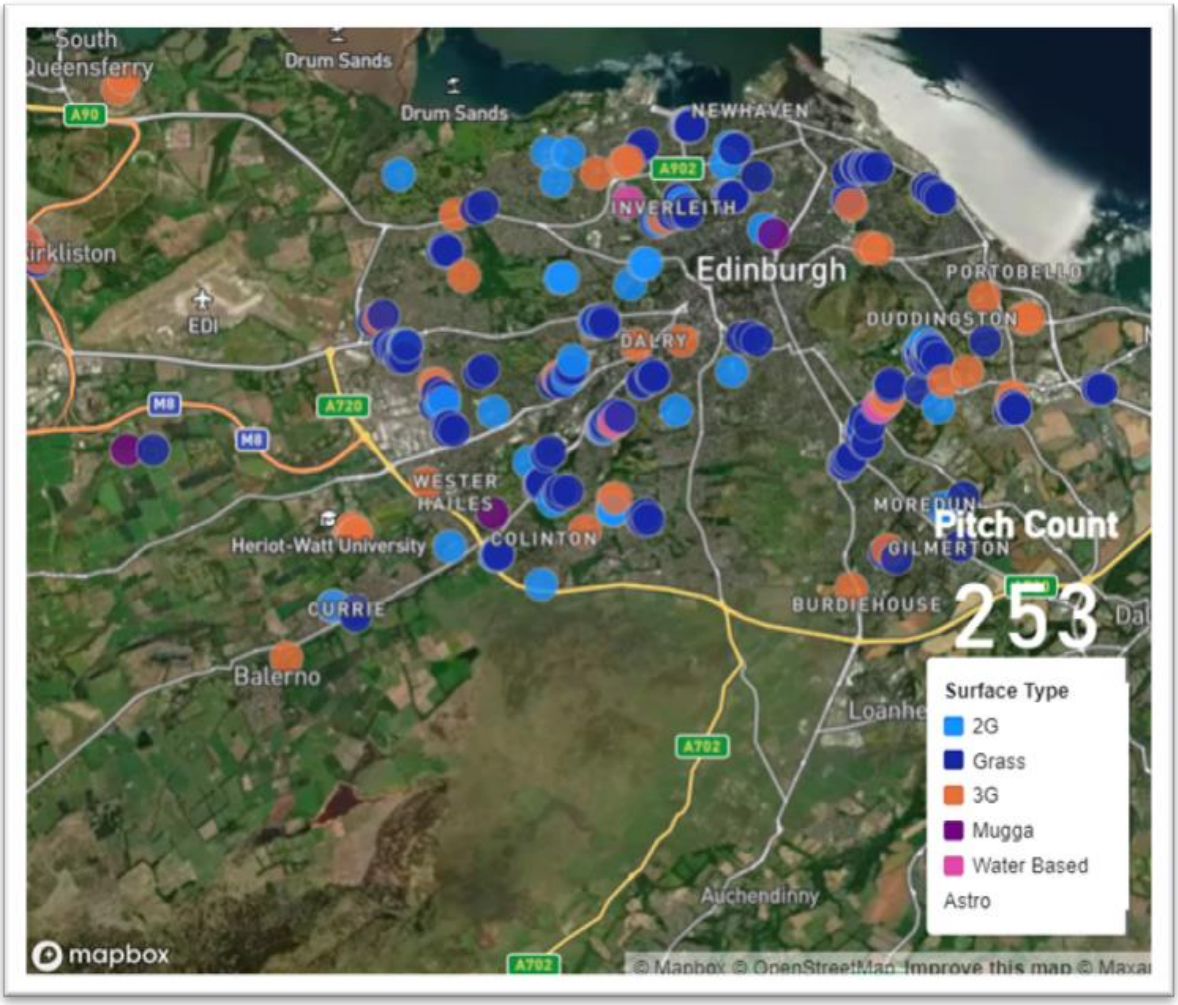


Figure 06.2: Pitch provision in Edinburgh (source: Edinburgh Pitches Strategy 2025; note: most pitches shown are full sized pitches accommodating football, rugby, hockey or cricket)

The Pitches Strategy 2025-2035 identifies key priorities, actions and measures to address issues relating to pitch provision and access. As with the PASS, many of these are organisational in nature and not spatial matters, however there are some which are noted as more relevant including where and how new pitches are provided.

These may come forward alongside appropriate development as part of useable and accessible open space.

Related to this, Topic Paper 01b Infrastructure -education sets out an evidence base for possible new school infrastructure. The School Premises (General Requirements and Standards) Regulations 1967 (as amended) sets out standards, including minimum requirements for playing fields. In these circumstances, the provision of pitches connected with schools can form part of education contributions and delivery given they would be a requirement of the educational estate.

Another action identified in the Pitches Strategy 2025-2035 relates to expanding pitch hub provision to increase capacity and availability, including provision of additional synthetic pitches and supportive infrastructure. It notes West Edinburgh as a key area where the possibility of a new pitch hub should be explored given anticipated population growth.

The Pitches Strategy 2025-2035 also seeks to identify pitches that are strategically located and well used and those that could be repurposed.

Although there is limited spatial data on specific sports beyond that noted above, the PASS notes that *"For physical activity such as walking, 60% of people living in the most deprived areas participated in recreational walking for at least 30 minutes in the last four weeks in 2019, increasing slightly to 63% in 2022. This compares to 86% of people who participated in the least deprived areas in 2019, decreasing slightly to 82% participation in 2022"*

Neither the PASS and the Pitches Strategy address golf or bowling greens. These are addressed in the Open Space Strategy which is discussed further on in this topic paper. This does not contain detailed data on levels of use in an Edinburgh context, however, they represent notable forms of open space in the city. Bowling greens comprise smaller spaces pocketed around the city, with golf courses being larger and covering a more substantive areas of ground within and beyond the urban area. According to the Open Space Strategy, golf courses comprised 26% of the urban area's open space.

Food growing

Growing Locally is Edinburgh's food growing strategy 2021-2026. It provides an overview of local food growing in Edinburgh; with aims to increase the amount of locally grown food produced and consumed in the city. This is supported by the document Cultivating Communities - A Growing Success The 3rd Allotments Strategy for the City of Edinburgh 2017 – 2027.

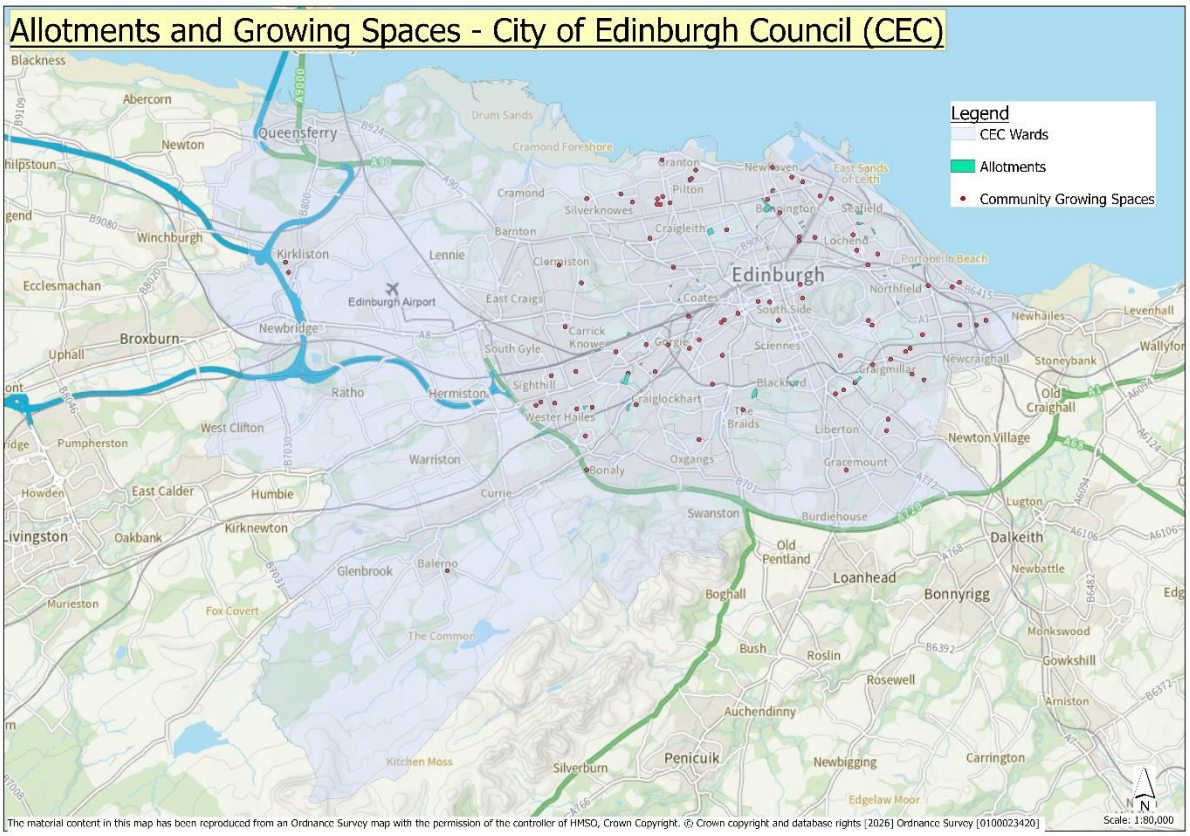


Figure 06.3: Allotments and community growing spaces in Edinburgh

Figure 06.3 shows the spatial distribution of Council and private allotments (which are generally allocated to an individual) and community growing spaces where people work together to grow food. Both help to tackle social isolation, improve health and wellbeing, improve food access and bring environmental benefits such as enhancing biodiversity and habitats. The Place Profiles provides mapping of food growing opportunities on a ward basis.

From the figure above, it is clear that there is an uneven distribution of allotments right across the city with limited provision in the city centre and to the west/ north-west of the city.

The pattern for community growing spaces is similar to allotments in that they are generally found away from the centre of Edinburgh and more dense parts of the city. As with allotments, community growing spaces are also under-represented in the north-west of the city, in addition to the southern areas like Oxgangs and Gilmerton. There are also no community gardens west of the city in settlements like Kirkliston.

The Scottish Index of Multiple Deprivation mapping in relation to Edinburgh is shown in figure 06.4.

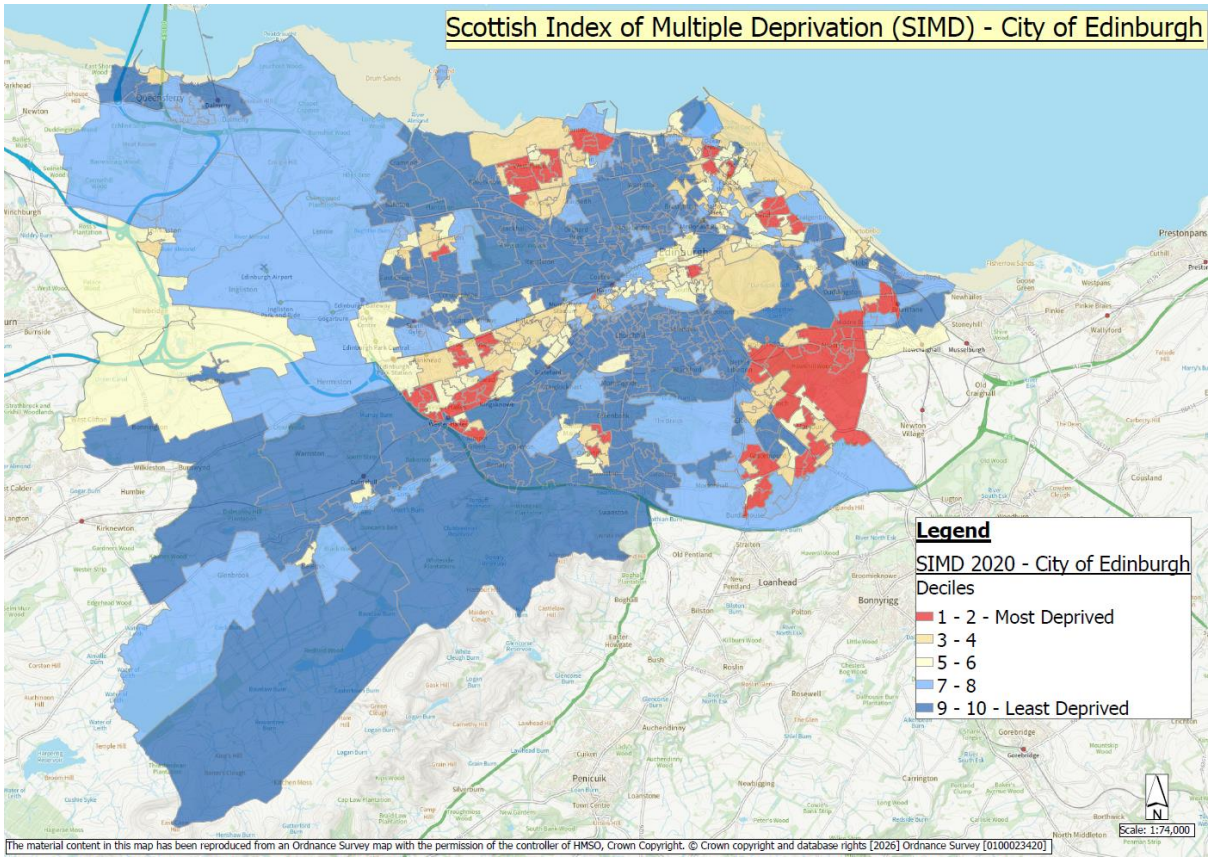


Figure 06.4: Scottish Index of Multiple Deprivation for Edinburgh area

When seen in conjunction with figure 06.3 on food growing sites, the SIMD mapping puts in particular focus the lack of allotments in the areas of Gilmerton and Burdiehouse to the south-east of the city as areas of particular deprivation. The same lack of allotment provision exists in more deprived communities, for example at Pilton, Granton and Drylaw.

The place-based engagement that has informed the Place Profiles highlights that people across Edinburgh generally support more growing spaces and consider that there is not sufficient access or availability. This ties with the findings of Edinburgh's allotment strategy (Cultivating Communities) which includes a customer survey carried out in March 2016. At the time, this also indicated a high proportion of new customers would prefer half-plots as their first choice. There is a move to provide more of these types of allotments going forward.

The Edinburgh Outdoors webpage has the latest information on allotment waiting times and provision. This notes that 'the waiting list for an allotment was 2,310 in March 2020 (140% of allocation) this increased to 5,658 in November 2021 (352% of allocation). The demand for allotments in Edinburgh far exceeds the available supply, leading to long waiting times.

In terms of the Proposed Plan, it will be important to explore whether there are opportunities to increase food growing spaces throughout the city but particularly in deprived areas and areas where there is a clear lack of provision.

Open Space

NPF4 defines open space as ‘space within and on the edge of settlements comprising green space or civic areas such as squares, market places and other paved or hard landscaped areas with a civic function.’

The Planning (Scotland) Act 2019 requires planning authorities to prepare and publish an Open Space Strategy (OSS). The Council is currently preparing its OSS starting with updating the Open Space Audit of around 1,500 sites. Around 35% of the audit work has been undertaken and the rest of the survey work is currently on-going. This work will form the basis of producing an updated OSS from Summer 2026 with expected completion in early 2027. This will enable the data to be used in conjunction with the spatial strategy and site requirements whilst preparing the Proposed Plan. New Scottish Government legislation and guidance on open space strategies is expected but there are currently no confirmed timescales. This may also be available by this time and will be taken account of.

The Council’s current Open Space Strategy (OSS) is Open Space 2021. The strategy was informed by an Open Space Audit (OSA) and associated mapping which identified open spaces across the city and grouped them by their typology as well as assessed their quality and recorded other key factors such as their size and public accessibility. There are four additional Locality Open Space Action Plans which also form part of the OSS. This information has been used as baseline evidence at this stage as much of the data remains valid.

The Council’s Open Space Strategy and action plans identify whether open space is publicly accessible and its typology in accordance with the format set out in Planning Advice Note 65: Planning and open space. This gives a comprehensive level of information and detail. Scotland’s Greenspace Map also contains some information taken from this audit.

The Action Plans and GIS mapping of the Open Space Audit show Edinburgh’s network of publicly accessible open spaces. They include information on spaces meeting the ‘good’ standard, as well as maps of ‘Local’ and ‘Large’ standard spaces and which areas have sufficient access to these. This is based on whether a home is within a 400m walking distance of a Local space and 800m walking distance of a Large space respectively. This is in recognition of the need for communities to have access to both smaller Local spaces closer to them as well as Large spaces they may travel further to use.

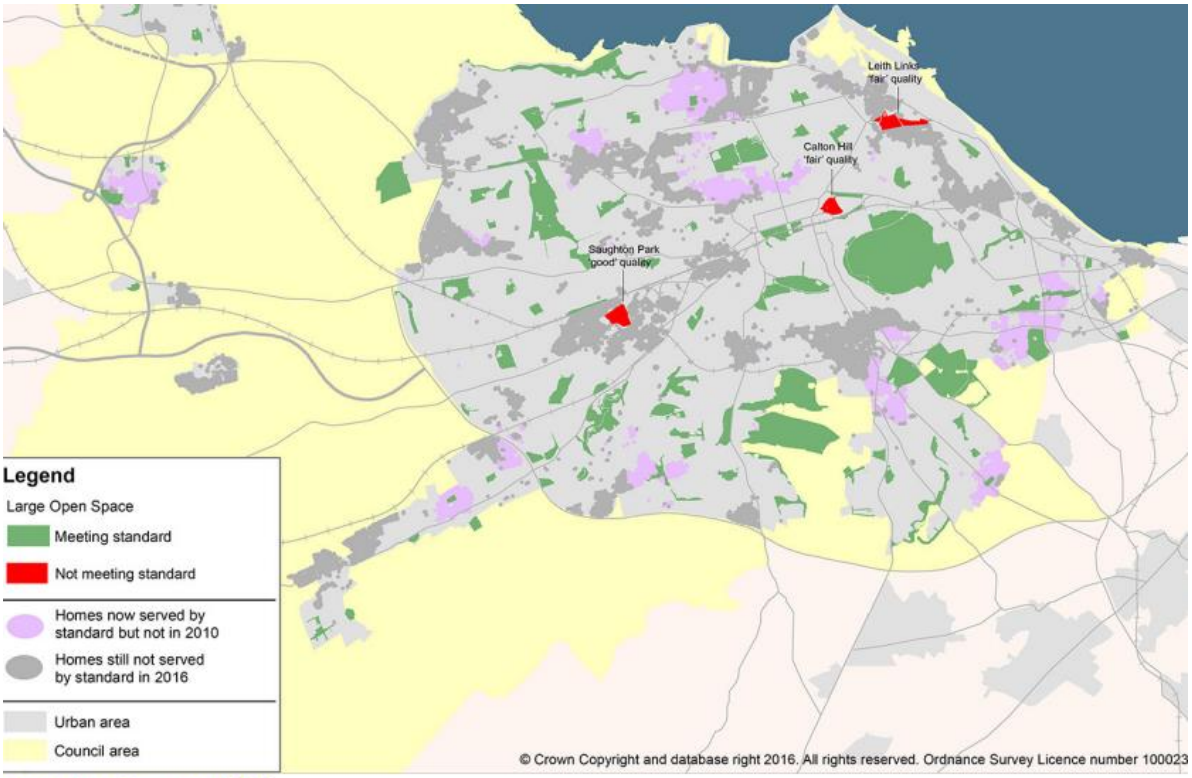


Figure 06.5: Edinburgh's publicly accessible large open spaces of a good standard and the areas within an 800m walking distance

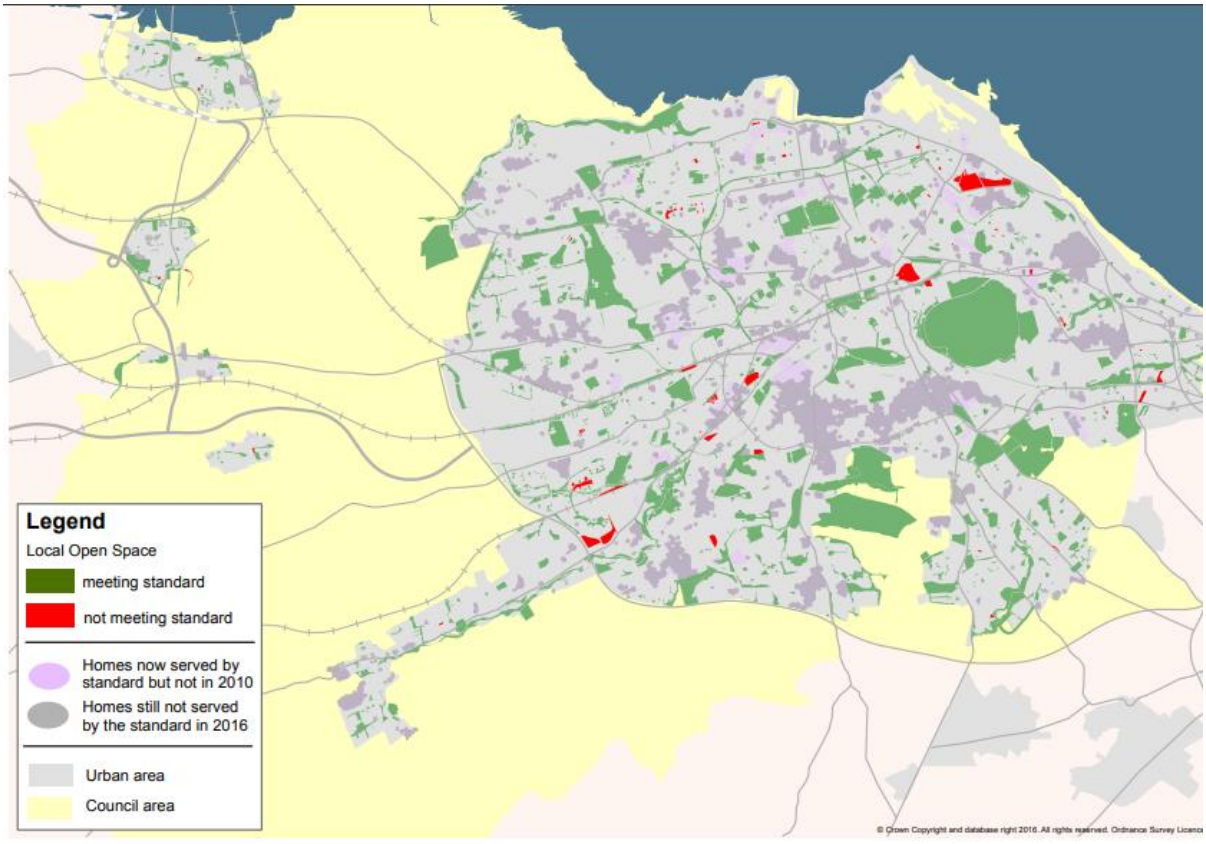


Figure 06.6 Edinburgh's publicly accessible local open spaces of a good standard and the areas within a 400m walking distance

These maps show that 89% of homes were served by the Local greenspace standard and 79% of homes were served by the Large open space standard.

There are some areas which are not adequately served by either a Local or Large standard space, for example parts of Morningside, Craigentinny and Mayfield north of Cameron Toll.

By comparison, some areas are well served by one form of space but not the other. For example, parts of East Craigs and Cramond are well served by Local space but fall short in terms of access to Large standard space. This is less of an issue the other way round, although there are some areas such as Craiglockhart where homes are within 800m of a good standard accessible Large space but not within 400m of a good standard accessible Local space. The OSS uses this mapping and gap analysis to prioritise where improvements to open space provision should be made to improve access in key areas.

Figure 06.7 below taken from the Open Space Strategy outline in black the bottom 20% most deprived areas in the context of Large standard. This illustrates which most deprived areas are lacking good standard Large open space nearby.

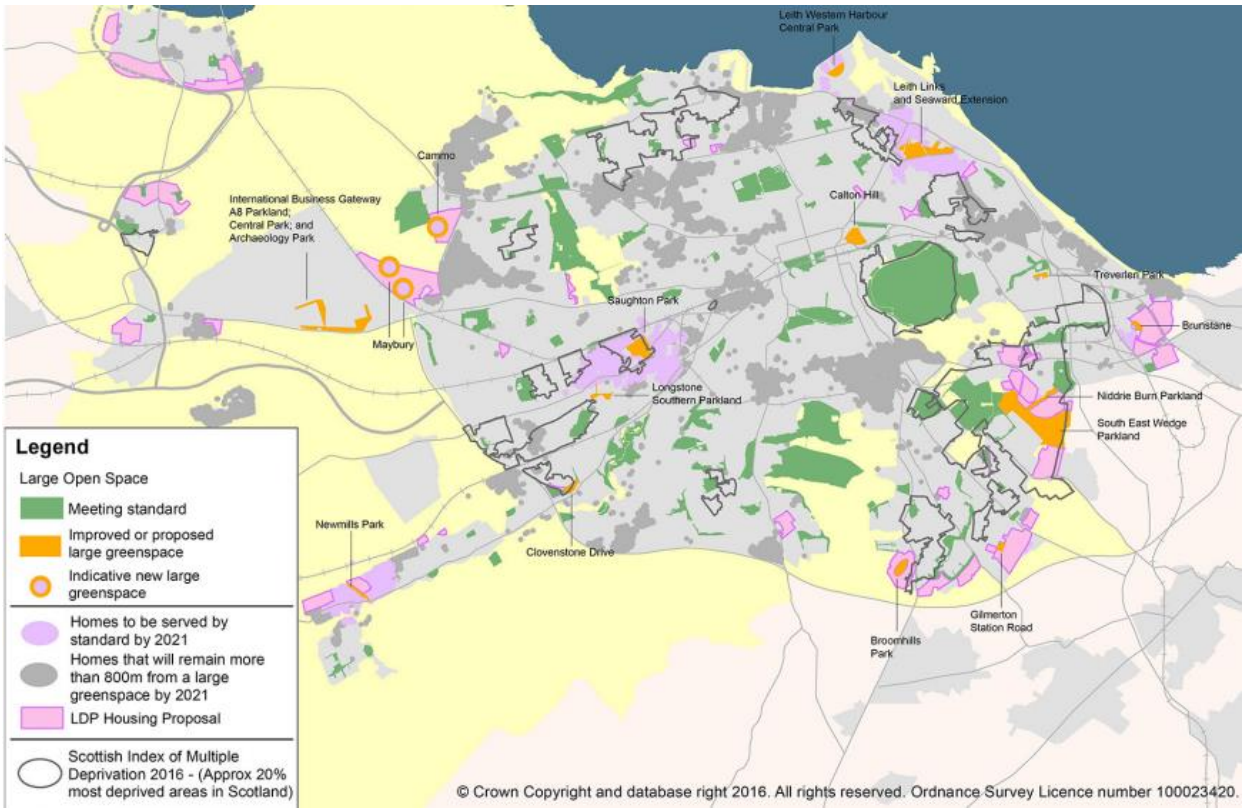


Figure 06.7: Areas with a sufficiency of access to large open space with the 20% most deprived areas outlined in black (source: OSS)

In general, Edinburgh's most deprived areas meet the access standard, however there are some exceptions such as parts of Stenhouse and Restalrig.

In terms of play sufficiency shown on figure 06.2, most of Edinburgh's deprived areas meet the play sufficiency standard however there are instances of overlap here also. For example, Restalrig is deficient as is Clovenstone.

The new OSS alongside the Place Profile work will help identify where new or improved open space may be required to ensure people have better access to open space and the benefits that this brings for example in terms of health and wellbeing.

It is also recognised that open space is important for a wide range of other functions and benefits in addition to recreation and play. For example, it is of particular value for nature, water management and climate resilience.

Provision of new open space and enhancements to existing open space should always consider how to maximise the wide range of complementary benefits, particularly drawing upon other evidence such as the Strategic Flood Risk Appraisal (SFRA) and Nature Network to assist with this.

Through the place-based engagement with the public at large and children and young people, access to open space was important and valued within places. Generally, access to open space was good but there were comments about quality, facilities and maintenance. The Place Profiles provide a more local insight on open spaces within the different wards.

The updated OSS strategy and Proposed Plan will explore opportunities to help deliver new or improved open space where it is required. There will be joint-working across the relevant Council services to ensure there is consideration of all the relevant matters as a whole.

Green Blue Network

Central Scotland Green Network

Edinburgh forms part of the Central Scotland Green Network (CSGN) identified in NPF4 as a national development. The infrastructure project is to play a key role in tackling the challenges of climate change and biodiversity loss including by building and strengthening nature networks.

The CSGN also relates to placemaking and connection, and the importance of green infrastructure to people's health and wellbeing along with the regenerative benefits to communities. NPF4 notes the importance of the network in urban areas where there is a pressure for development. Enhancement and provision of multi-functional green blue infrastructure is key priority that can be addressed in local development plans through place-based planning, strategy and policy. Edinburgh's Strategic Green Blue Network shares many of these priorities.

Edinburgh's Strategic Green Blue Network

The Council originally produced a Strategic Green Blue Network as part of City Plan 2030. This has been updated and has most recently been published as part of the

latest Edinburgh Design Guidance. A storymap has also been produced to provide further information.

Edinburgh's existing green blue infrastructure includes its greenspaces and watercourses and these are significant assets to the city that contribute to its overall green blue network. Thay are an important characteristic of Edinburgh as a place but are also of significant value in addressing the dual nature and climate emergencies.

Three main components of Edinburgh's Green Blue Network are identified as recreation, water and biodiversity. An example of this is a green space used for recreation which also contributes towards water management and provides habitat of value to wildlife. The work on Edinburgh's Strategic Green Blue Network aims to understand how different components overlap and combine, identifying areas of particular importance, function and opportunity at a strategic scale.

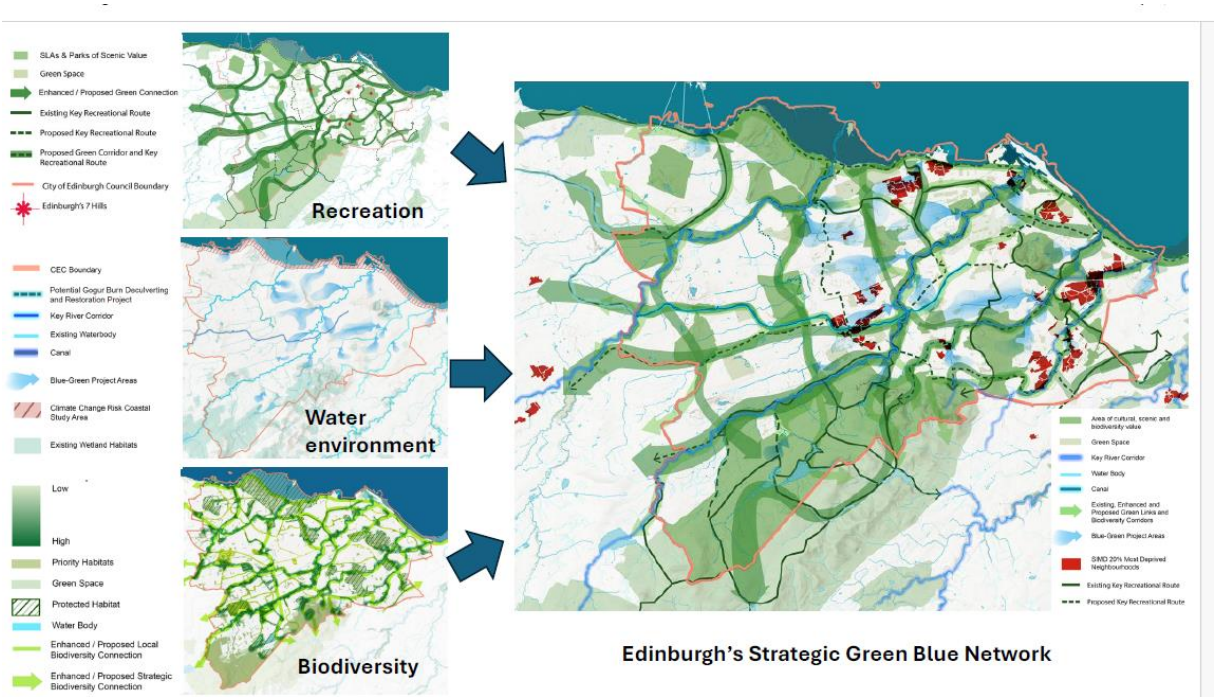


Figure 06.8: How the three main components of Edinburgh's Green Blue Network are mapped separately and layered together to create an overall network

Mapping these elements together identifies areas and routes of particular importance for multiple functions, as well as identify where areas or routes provide opportunities for further expansion and enhancement.

The recreation aspect of the Green Blue Network incorporates Edinburgh's key recreational routes, including those important for active travel and the Core Path Plan. There is particular emphasis on green routes and those connecting important areas of key scenic and recreational value.

The biodiversity element of the network focuses on priority habitats and the routes that are especially important for biodiversity connection. The issue of biodiversity, habitats and nature network is addressed further in Topic Paper 5 Biodiversity.

The blue infrastructure element includes features such as key watercourses, wetland habitats and opportunity areas to improve water management and flood risk. This incorporates information from the SFRA and other information such as the Scotland Wetland Inventory layer.

Further information on the water environment, including Natural Flood management maps and River Basin Management Plan as also noted in SEPA's Planning Advice note, is addressed further in Topic Paper 04 Water management, flood risk and coastal development. Topic Paper 02 Natural Places and Topic Paper 05 Biodiversity deal with landscape and nature networks in greater depth respectively, including evidence relating to habitat and species such as riparian corridor and fish migration. This paper focuses on some key examples of where areas of combined value are identified or where there are opportunities to create multiple benefits at a strategic scale.

As may be expected, watercourses tend to be assets of value across all three elements. This especially applies to major watercourses like the River Almond and Water of Leith.

Corstorphine Hill is also recognised as a feature of both biodiversity and landscape/recreational value, however the green blue network mapping also reveals that there are opportunities to improve for water management. Further review of the SFRA shows that multiple flow paths leading from this natural high point as may be expected and that many of these are accompanied by areas of flood risk given the large extent of culverting.

The Proposed Plan will explore improvements to the green blue network infrastructure as dedicated projects in their own right or as part of any future proposed development sites. There may be opportunities to provide and enhance sustainable drainage systems as part of open space for example that provide biodiverse habitats and scenic improvements to spaces for those using the space. This would require consideration of other functions a space may be providing.

Summary of stakeholder engagement

Key Agency	**SEPA**
Main views raised	• **Draft Topic Papers (Nov 2025):** Refer to the required SEPA evidence sources for LDP evidence gathering. It is accepted that not all information has to be in this paper itself as long as it is appropriately cross refenced. The paper should link more comprehensively to other related topic papers.

	• **Final Topic Papers (March 2026):** Statement of agreement for this topic paper has been provided.
Council response and implications for the proposed plan	In response to the comments made at the draft topic paper stage, more comprehensive linkages to related topic papers were made. The recommended information sources have also been included or included in related topic papers e.g. Topic Paper 5 Biodiversity and suitable cross references made. These evidence sources shall be taken into account in the preparation of the plan.
Is the agency content with the evidence?	SEPA have advised: 'We are satisfied with the revisions made to the Evidence Report and are pleased to offer a statement of agreement covering our key environmental interests below: Climate change; Nature networks; Blue Green Infrastructure; Water Management.'.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including SEPA in preparing the Proposed Plan.

Key Agency	**Scottish Water**
Main views raised	• **Draft Topic Papers (Nov 2025):** The topic paper must recognise the importance of managing surface water above ground and at source. The paper should more holistically consider the different subtopics since this is the way to better create spaces providing multiple benefits e.g. play, open space and blue green functions.
Council response and implications for the proposed plan	The paper has been amended to improve the readability of the paragraph with legibility issues. Surface water has been more comprehensively addressed. The importance of above ground management and handling at source have been made clear.

	The overlap between distinct but interrelated sub-issues has been considered more thoroughly to expand on the connections between these. For further dedicated consideration of surface water issues please see topic paper 4: water management, flood risk and coastal development. The preparation of the Proposed Plan will consider surface water and multifunctionality of spaces in line with the updated approach noted above.
Is the agency content with the evidence?	No further comments were raised on this topic paper in the final round of engagement following the changes being made during the draft consultation stage. Scottish Water have advised: 'We are in general agreement of the matters relating to our organisation within these topic papers.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Proposed Plan will consider surface water and multifunctionality of spaces as set out above.

Key Agency	**NHS Lothian**
Main views raised	• **Draft Topic Papers (Nov 2025):** It is important for food growing evidence to be considered in the context of SIMD information
Council response and implications for the proposed plan	SIMD information has been incorporated and analysed in the context of the food growing section. This will be considered as part of the preparation of the Proposed Plan. This is also covered in the Place Profiles where there is a more localised assessment of food growing.
Is the agency content with the evidence?	No further comment was received on this issue in the final round of consultation following the changes made after the draft consultation on the draft topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Information on food growing in the context of SIMD information will be considered as part of preparation of the Proposed Plan.

Key Agency	SportScotland
Main views raised	• **Draft Topic Papers (Nov 2025):** Queried if tennis courts, bowling greens and golf courses will be considered as part of the Open Space Strategy. A correction was pointed out that the Physical Activity for Health Framework is the applicable national strategy document was also made. It is also suggested that wording and information from the SPS is used directly.
Council response and implications for the proposed plan	Clarification has been provided that golf courses, tennis courts and bowling green provision will be considered part of the upcoming Open Space Strategy. Any applicable implications for the preparation of the Proposed Plan will be taken into account. The changes relating to the SPS and Physical Activity for Health Framework were also made.
Is the agency content with the evidence?	No further comment was received on this issue in the final round of consultation following the changes made after the draft consultation on the draft topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Applicable updates to the OSS and relevant information from the SPS and Physical Activity for Health Framework will be used to inform the preparation of the plan.

Key Stakeholder	Homes for Scotland
Main views raised	• **Final Topic Papers (March 2026):** Comments are made about the positive steps housebuilders are already taking to incorporate, enhance and maintain green blue infrastructure. This includes play space, sports provision and recreational greenspaces. Biodiversity

	requirements can have a detrimental cost of maintaining these spaces for residents however. HFS does not dispute the evidence set out in this paper however a number of evidence sources are suggested with summary comments about what these sources are. Many cover best practice in relation to green blue infrastructure, with others relating to natural flood management and physical activity. City Plan 2030 housing sites that are de-allocated should be considered for alternative uses such as community gardens or allotments.
Council response and implications for the proposed plan	The suggested evidence sources on natural flood management are welcomed as useful additions to compliment the Natural Flood Management mapping in Topic Paper 4 Water management, flood risk and coastal development. The other suggested additional evidence sources do not contain evidence relevant for preparation of the Proposed Plan nor does it offer comments on the evidence already contained in this paper. For example, the best practice in relation to green blue infrastructure is more helpful at the point of developing more site-specific proposals. The evidence sources on the facilities mapping appear as though they may have been useful however the link to the facility planning model does not work and the other sports facilities database does not show any facilities information for Edinburgh. SportScotland has provided a response to this Evidence Report engagement previously and did not suggest using this information. If any City Plan 2030 housing sites are de-allocated, they may be considered for alternative uses and this could include community gardens or allotments but this would be considered at the Proposed Plan stage. This paper sets out that the OSS is expected to be completed by early 2027 with work commencing in summer 2026 following completion of the Open Space Audit which is currently underway. As a result, there is no draft of the OSS that will be available for the Gate Check or for HFS to

	review but OSS will be able to inform the preparation of the plan itself and will be made available once complete. Issues raised about the cost of biodiversity measures and marketability of sites do not provide commentary on the evidence in this paper, nor link to evidence themselves. These comments would be more relevant as responses to the draft content of the plan once proposed site briefs and/or policies are set out.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other engagement and matters raised

Discussions have taken place with colleagues in the Council's Parks and Openspace service regarding the evidence presented and to the preparation of the next Open Space Strategy and Play Sufficiency Assessment.

Summary of implications for the Proposed Plan

Play

The Proposed Plan will be informed by the Play Sufficiency Assessment (PSA) and identify a need for new and improved facilities in certain locations, especially where the PSA shows parts of the Council area that are not meeting the play access standard. This may take the form of upgrading existing facilities or the provision of new facilities, including as part of new development.

The Proposed Plan will have consideration of other related issues such as where areas of deficiency overlap with lower SIMD areas, disability and the needs of different demographics.

Sport

The Sports Pitch Strategy 2025-2035 (SPS) demand analysis indicates that while many pitches are well-utilised, there is still significant untapped potential for more efficient use of existing facilities. Further updates and outputs from the SPS action plan shall be monitored during the preparation of the Proposed Plan, including

considering alternative uses for existing pitches and if proposals for pitches and pitch hubs should be included in the Proposed Plan.

For larger development sites in the Proposed Plan, it will be considered if there is a need to provide pitch provision as part of open space requirements, taking account of pitch usage information and availability in the area.

Any potential new education infrastructure is likely to include sports and leisure facilities, which should serve the school and the community.

Food growing

Given the high level of demand for the limited amount of growing spaces that exists all over the city, it shall be important for the Proposed Plan to continue to protect existing growing areas as a form of open space.

Creation and promotion of new food growing opportunities should also be explored in the Proposed Plan especially in areas where there is limited provision including delivery through any possible proposed development sites.

Any new proposals emerging through updates to the Food Growing Strategy and Allotments Strategy shall be considered for inclusion as part of the Proposed Plan.

Open Space

The Council is producing an updated Open Space Strategy, which will include golf courses, tennis courts and bowling green provision, and will inform the Proposed Plan. This is expected to identify a need to continue to designate and protect open space but may also provide information where alternative uses for spaces can be considered in the Proposed Plan.

The Open Space Strategy will highlight where new or improved open space provision is required, including as part of potential development sites.

Evidence such as the SFRA, Nature Network and Strategic Green Blue Network will help identify where open spaces can provide additional functions and benefits that are complementary to their open space function.

Green blue network

Green infrastructure and its relationship to climate and nature as well as to people and place will be a key component running through the strategy of the Proposed Plan and contributing to the national development.

The Proposed Plan will use the green blue network to inform development principles for areas of development and public realm where appropriate, as well as dedicated green blue network proposals. This can include areas where further provision is needed, or where existing infrastructure needs enhancement.

Active travel proposals may present a particular opportunity to improve connectivity for people, nature and water given they can connect key nodes over greater distance.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

07: Zero waste, energy, heating and cooling

Topic	**07: Zero waste, energy, heating and cooling**
Description of topic	Analysis and implications of information on waste management, electricity grid, if and where there are opportunities for low and zero carbon generating technology and to decarbonise heating including heat networks.
Information required by the Act	**Section 15(5)** • the infrastructure of the district (including systems for the supply of water and energy); and • how that infrastructure is used. **Regulation 9** Have regard to: • the national waste management plan • the national marine plan • any regional marine plan
Relevant NPF4 Policies	• Policy 11 Energy • Policy 12 Zero waste • Policy 19 Heating and cooling
Linked topic papers	• Topic 01d Infrastructure - energy and digital infrastructure • Topic 01e Infrastructure - water and waste water • Topic 02 Natural places • Topic 03 Green belt, countryside and rural • Topic 08 and 09 Climate change and climate mitigation • Topic 17 Community wealth building
Local Development Plan Guidance	Policy 11: Energy Collate evidence on opportunities for energy developments which can be supported by landscape sensitivity studies and consideration of appropriate designated sites and areas with natural and cultural value. Considering evidence in Topic 2 Natural Places and Topic 3 Green belt, countryside and rural, a related Landscape Sensitivity Assessment (LSA) for various forms of renewable energy has been commissioned. The implications of the LSA for energy opportunities are addressed in this topic paper. Identify key strategic grid improvements associated with the distribution and distribution network. This is addressed in Topic 01d Infrastructure - energy. Existing or emerging strategies for the delivery of renewables and low-carbon and zero emissions technologies are relevant considerations, including hydrogen and carbon capture utilisation and storage (CCUS).

	Policy 12: Zero waste Identify any needs for new waste management infrastructure. Evidence can also include circular economy strategies as well as local waste and recycling data and targets. Policy 19: Heat and cooling Evidence should include areas of heat network potential and any designated Heat Network Zones (HNZ). Other information which may be useful is in this context is heat mapping, retrofit strategies, sustainability strategies, local area energy plans and the local housing strategy.
List of and links to evidence	• **CD354** Review of Waste and Recycling Strategy: Report to Transport and Environment committee, City of Edinburgh Council, August 2018 • **CD303** Edinburgh's Waste & Recycling strategy 2010-2025, City of Edinburgh Council, October 2010 • **CD385** "What happens to your recycling" weblink, City of Edinburgh Council • **CD189** Scotland Heat Map, Scottish Government • **CD135** Draft Energy Strategy and Just Transition Plan, Scottish Government, January 2023 • **CD148** Heat in Buildings Strategy - achieving net zero emissions in Scotland's buildings, Scottish Government, October 2021 • **CD163** Making things last: a circular economy strategy, Scottish Government, February 2016 • **CD221** Stop, Sort, Burn, Bury - incineration in the waste hierarchy: independent review, Scottish Government, May 2022 • **CD190** Scotland's Circular Economy Waste Route Map 2030, Scottish Government, December 2024 • **CD155** Hydrogen developments identified in the Hydrogen Action Plan, Scottish Government, December 2022 • **CD172** Onshore wind: policy statement, Scottish Government, December 2022 • **CD110** Scotland's Marine Plan: A Single Framework for Managing Our Seas, Scottish Government, March 2015 • **C218** Sectoral Marine Plan for Offshore Wind Energy 2020, Scottish Government, October 2020 • **CD137** Draft Updated Sectoral Marine Plan for Offshore Wind Energy, Scottish Government, May 2025 • **CD223** The Initial Plan Framework for Innovation and Targeted Oil and Gas (INTOG), Scottish Government, December 2022 • **CD086** Edinburgh 2050 City Vision, City of Edinburgh Council, 2023

- **CD083** Edinburgh's 2030 Climate Strategy, City of Edinburgh Council, December 2021
- **CD291** Edinburgh LHEES Integrated Impact Assessment, City of Edinburgh Council, March 2024
- **CD262** City of Edinburgh Council's Local Housing Strategy Action Plan, City of Edinburgh Council, June 2025
- **CD236** Heat Networks (Scotland) Act 2021, Scottish Parliament, March 2021
- **CD235** Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019
- **CD352** Report to the Council's Transport and Environment Committee on "Comparison of recycling rates in UK cities", City of Edinburgh Council, September 2025
- **CD628** SEPA information on City of Edinburgh's Licenced sites and capacity summary, SEPA
- **CD183** Planning Guidance: Battery Energy Storage Systems, Scottish Government, March 2026
- **CD536** Landscape Sensitivity Assessment Renewable Energy Development – City of Edinburgh Council, LUC, February 2026
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023

List of matters covered

This topic paper considers the following in relation to:

- heating and cooling
- energy
- zero waste

Summary of evidence

National context

Scotland's Energy Strategy and Just Transition Plan (Draft) sets out a range of ambitions for Scotland across various sectors. A common theme is to decarbonise Scotland in a way that benefits all in society and the country's economy. Generating more electricity from renewable sources and increasing storage capacity for this are key priorities, as is renewable hydrogen. Pumped Hydro Storage is a Scotland-wide national development in NPF4. In addition, decarbonising existing sectors such as transport and industry is an important focus. The Heat in Buildings Strategy provides further information on the decarbonisation pathway for buildings to support these aims. There has also been a range of legislation passed to support this objective including Heat Networks (Scotland) Act 2021 and Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019.

The UK Strategic Spatial Energy Plan (SSEP) has not yet been produced. This 'will be the first overall plan for Great Britain's energy production and storage from 2030 to 2050'. Preparation of the Proposed Plan will consider relevant elements of a draft or finalised plan as appropriate.

A Regional Energy Strategic Plan is to be produced for Scotland by 2027, relevant implications of will be considered as appropriate.

The Scottish Government's Onshore wind: policy statement 2022 reiterates the importance of wind turbines towards increasing the production of renewable energy. It sets out that there may be circumstances in which turbines may not be acceptable, including on some landscape and visual grounds (as set out in NPF4), though it also states that there is a need for LDPs to realise their area's full potential for wind capacity. It notes that Landscape Sensitivity Studies can inform this.

Scotland's National Marine Plan (2015) and the Initial Plan Framework for Innovation and Targeted Oil and Gas (INTOG) 2022 identify the need for sustainable development of offshore wind, wave and tidal renewable energy in the most suitable locations. There are no tidal or wave energy projects identified for the Forth and Tay regional area, but wind farms are identified offshore further east of Edinburgh as noted below.

Both Making things last: a circular economy strategy and Stop, Sort, Burn, Bury - incineration in the waste hierarchy: independent review emphasise the importance of minimising waste, recycling and then burning what cannot be reused as productive energy rather than landfilling as key to a zero waste strategy.

Scotland has had waste and recycling targets for many years, however, Scotland's Circular economy waste route map 2030 has reviewed these targets and proposes to create new targets going forward. This is because many are no longer fit for purpose, for example not capturing whole life emissions and focussing too much just on disposal. Scottish Government proposes to set new targets by 2027. Relevant new targets will be considered as appropriate.

Regional context

There is no current Regional Marine Plan for Forth and Tay area, nor is there an INTOG sectoral Marine Plan. Any emerging work on these will be considered as appropriate.

Local context

The Edinburgh 2050 City Vision sets out sustainability as one of the 12 key themes for Edinburgh. Edinburgh's 2030 Climate Strategy addresses this further and recognises climate change is the biggest threat facing the planet and is why the Council has declared a climate emergency.

The Edinburgh Local Heat and Energy Efficiency Strategy (LHEES) contains further information on decarbonisation and strategies for retrofit and considering different local area's energy planning, including in spatial mapping form involving Ordnance Survey (OS) data. The LHEES has received input from key stakeholders, including utility companies such as Scottish Water on heat extraction opportunities in its network. The Council's own Local Housing Strategy Action Plan also supports the above aims in terms of heat, energy and decarbonisation. Two of its key strategic objectives is to 'ensure all homes are well maintained, energy efficient, safe, sustainable and climate proofed, working towards net zero emissions' and to 'reduce fuel poverty and ensure every household has a warm home they can afford to heat.'

Heating and Cooling

Information from Edinburgh's LHEES shows that homes make up the overwhelming majority Edinburgh's buildings (around 93%) and that just over 90% of the 248,000 homes are connected to the gas grid. Data from the gas network can help illustrate the scale and nature of the challenge of decarbonisation. Figure 07.1 shows properties connected to the gas grid are located across the Council area, primarily in urban areas. This indicates that the whole Council area should be considered an area of heat demand, particularly when considering how the city needs to transition to net zero.

Gas grid connection status	Number	Percentage
Connected	241,396	90.7%
Not connected	23,735	8.9%
Unknown	1,013	0.4%
Total	**266,144**	**100%**

Source: Domestic Baseline Tool

Table 07.1: Breakdown of homes in Edinburgh by gas grid connection

Edinburgh's LHEES recognises that there are significant differences in the thermal performance of properties across the city. One key example of this is shown in figure 07.2 below breaking down the split between insulated and insulated walls of residential homes.

Construction type	Number	Percentage
Insulated	135,836	51.0%
...of which cavity, insulated	89,450	33.6%
...of which solid brick/stone, insulated	7,895	3.0%
...of which system built, insulated	15,611	5.9%
...of which timber frame, insulated	22,880	8.6%
Uninsulated	129,706	48.7%
...of which cavity, uninsulated	41,592	15.6%
...of which solid brick/stone, uninsulated	80,708	30.3%
...of which system built, uninsulated	3,630	1.4%
...of which timber frame, uninsulated	3,776	1.4%
Unknown	602	0.2%
Total	**266,144**	**100%**

Source: Domestic Baseline Tool

Table 07.2: Breakdown of homes in Edinburgh by wall construction and insulation (source: from Edinburgh's LHEES)

The Council's LHEES undertakes a city-wide analysis of how different areas and property types can transition to low and zero carbon generating heating systems. This is based on a comprehensive and holistic analysis of information like that above. Based on this, the LHEES identifies that some areas, generally those including more modern homes, have greater suitability for their own zero direct emissions (ZDE) heat sources such as air source heat pumps. This is typically due to the building stock having better thermal performance more suited to the lower temperature and relatively constant heating provided by these heat sources. The LHEES does also recommend improving insulation measures to improve heat retention in buildings to increase suitability for lower temperature heating from sources such as heat networks and air source heat pumps.

The Integrated Impact Assessment (IIA) data for the LHEES provides insight on the benefit of this by showing the 'potential to improve health and wellbeing by making homes more energy efficiency and, thus, warmer.' Conversely, however, the IIA recognises there could be a negative effect on fuel poverty and health if energy efficiency measures are poorly installed.

In other parts of the city, heat networks are considered the more preferred solution. Currently, Edinburgh does not have any designated heat network zones (although it does have heat networks). Identification of areas more suited to heat networks has been informed by sources including Scotland's Heat Mapping. Figure 07.3 below shows this mapping with layers turned on for heat demand (purple), existing heat networks (green) and energy supply sources (red and yellow).

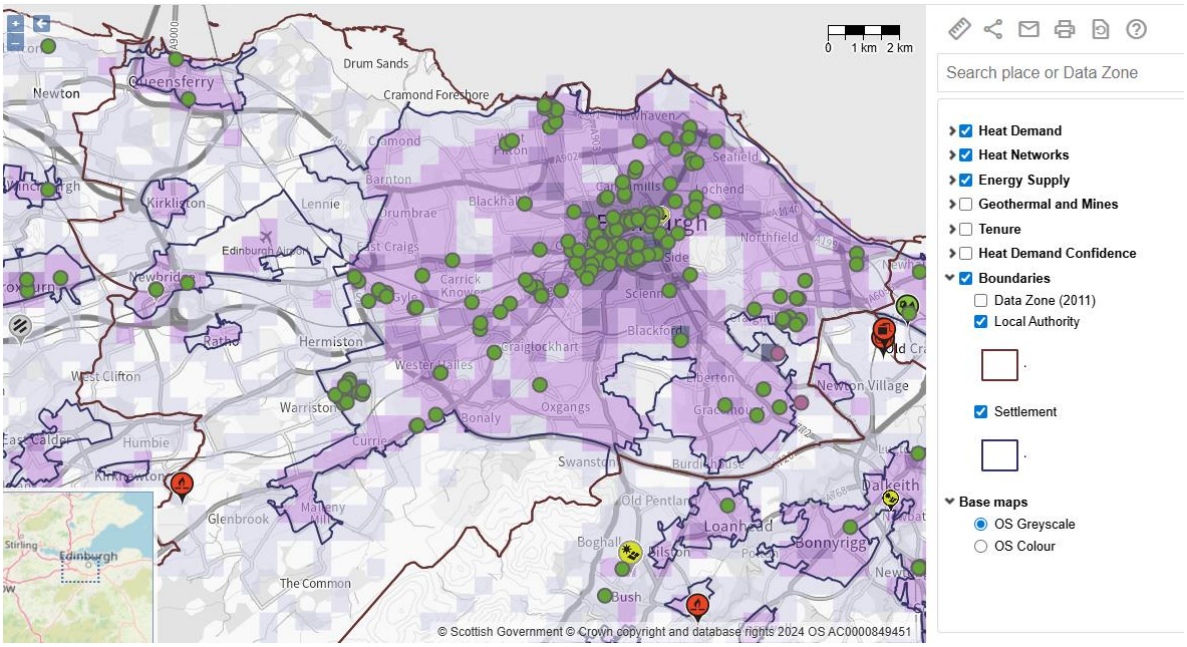


Figure 07.3: Scotland's heat mapping for Edinburgh

Having analysed relevant information such as that set out above, the LHEES proposes heat network zones as shown in figure 07.4 below. These generally have older properties with poorer thermal performance and/or greater densities with less space available on or adjacent to buildings. Many such buildings also have individual or collective heritage value for example being listed or within a conservation area as outlined in Topic 10 Historic assets and places. In these cases, there may also be heritage, aesthetic and practical reasons why they are less suited to on-site ZDE solutions which require more space and have greater visual and fabric impact. For those, heat networks may be more suitable. Higher densities can help the viability of heat networks by maximising the number of connections to the network.

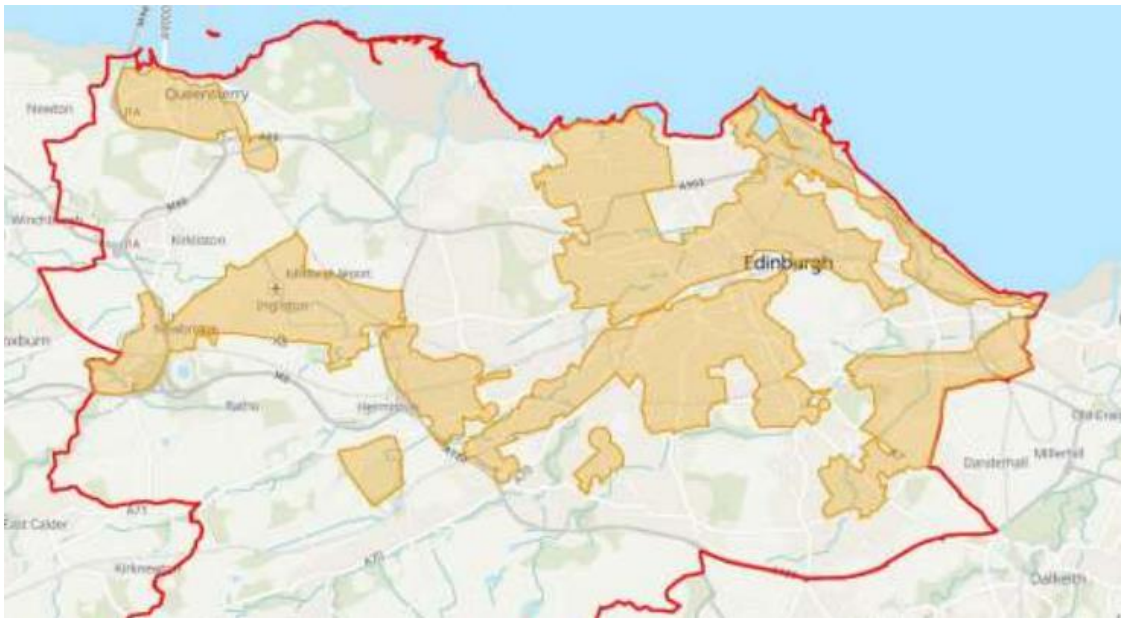


Figure 07.4: Refined initial heat network zones in Edinburgh (source: LHEES)

Heat networks can use existing heat generated from on-site operations, although cleaner purpose-built heat generation sources may also contribute. In addition to providing cooling to surplus heat generating uses, heat networks are key to transitioning many existing buildings away from intensive carbon generating heat sources such as domestic boilers. This is especially the case where other alternatives such as individual air source heat pumps are not appropriate or viable.

The delivery and extension of heat networks can be considered for the plan spatial strategy and sites in relation to networks, potentially assisting network extension to serve existing communities.

NPF4 states that ‘the spatial strategy should take into account areas of heat network potential and any designated Heat Network Zones (HNZ).’ When NPF4 was approved, it was expected that a process for designation of HNZs would be finalised. In the absence of this, the Council recommended zones in the LHEES are the best alternative. NPF4 does state that ‘LDPs should take into account the area’s Local Heat & Energy Efficiency Strategy (LHEES).

NPF4 policy 19a states that ‘development proposals within or adjacent to a Heat Network Zone identified in a LDP will only be supported where they are designed and constructed to connect to the existing heat network.’ This assumes LDPs will recognise HNZs but this is currently not feasible for the reasons given above. Existing City Plan 2030 policy Inf 16 Sustainable Energy and Heat Networks addresses this issue and has the same overall emphasis as NPF4 policy to encourage connections to heat networks but without the specific focus on designated HNZs. This is an issue which needs to be explored in the Proposed Plan.

Green data centres fall within NPF4 National Development 12 Digital Fibre Network. The Council must consider if and where these may be appropriate. Many factors influence what may be considered appropriate locations, including size, landscape and visual impacts. The Edinburgh Landscape Character Assessment, Green Belt Review, and to some degree the Landscape Sensitivity Study, are important considerations (as set out in Topics Natural Places, and Green Belt, Countryside and Rural). Data centres also generate significant amounts of surplus heat and a ‘green’ data centre (though not defined in NPF4) should find end-users for this. It may therefore be appropriate to locate data centres close to heat users in need of decarbonisation if there were instances where the Council were minded to support these. This issue is also covered in Topic 1d Infrastructure - energy and digital infrastructure.

There are no hydrogen production proposals for Edinburgh in the Hydrogen Action Plan (2022) however it does identify the potential for Scotland Gas Networks (SGN) to repurpose an existing pipeline from Grangemouth to Edinburgh to transport hydrogen.

For Edinburgh, a key aspect of considering cooling is in relation to climate change. This is addressed in topic paper 8/9 Climate mitigation and adaptation.

Energy

As noted in topic paper Topic paper 01d Infrastructure - energy and digital infrastructure, SPEN's transmission heat map shows key elements of the electricity generation and transmission network. This includes the routes and voltages of key overhead lines, grid supply points (GSP) and key sources of distribution generation including Battery Energy Storage Systems (BESS). It is important that terrestrial and marine planning and licensing is aligned as noted in the National Marine Plan 2015 and its future iterations.

This mapping shows Edinburgh has a spread of smaller energy generation sources at present, usually in the range of 1-10MW and it also shows potentially larger scale proposals that may come online in future, such as currently proposed BESS and solar array developments. Locations with close proximity to the transmission network would also potentially represent the most efficient locations to locate energy generation sources.

This is only one variable in the suitability of a site in planning terms, however. Many locations adjacent to these overhead lines and substations are located in green belt and countryside locations and therefore, there is a need to consider landscape and visual impacts alongside other matters.

NPF4 Policy 11 Energy states that 'LDPs should seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development.' BESS Planning Guidance confirms 'this could include areas appropriate for BESS.'

Edinburgh does not have any adopted spatial frameworks for renewable energy development. The Scottish Government's local development planning guidance (2023) advises that planning authorities may wish to prepare landscape sensitivity studies to inform their spatial strategy with regard to renewable energy developments. Based on the Council's updated Local Landscape Character Assessment as set out in Topic 2 Natural Places, a Landscape Sensitivity Assessment (LSA) 2026 for various forms of renewable energy has been produced.

Following NatureScot's Landscape Sensitivity Assessment Guidance (2022), the LSA considers the sensitivity of different landscape typologies within the council area to wind and solar power installations and battery energy storage systems (BESS), or combinations of solar and BESS. The study has regard to the existing landscape's landform, landcover, historic character, field pattern, visual receptors, visual character, and perceptual or scenic qualities. Landscapes with lower sensitivity to these forms of development, may provide opportunities for renewable energy infrastructure, subject to full consideration of specific proposals through the

appropriate consenting regime whilst opportunities would be more limited in areas of higher sensitivity.

The LSA applies to eight of the thirteen Landscape Character Types (LCT) with some LCTs scoped out due to obvious locational constraints such as ‘Coastal Sands’ and ‘Prominent Urban Hills’. Each LCT has been assessed against a five-level scale from low to high sensitivity with respect to the extent that different types and scales of renewable energy development would impact it. For example, a medium sensitivity level means that whilst a landscape may have some ability to accept renewable energy development, it would be likely to alter key characteristics and qualities of the landscape and require care in its siting and design.

Each of the following type and scale of renewable development were assessed and would impact the assessed LCTs:

- Small to medium wind turbines (50m-149.9m to blade tip)
- Large wind turbines (over 150m blade tip)
- Small solar PV installations (1 to 5 hectares)
- Medium to large PV installations (5-50 hectares)
- Small BESS installation (less than 1 hectares)
- Medium to large BESS installation (1 to 15 hectares)

The findings show that LCTs within Edinburgh contain landscapes of higher and lower sensitivity to renewable energy development, however, no LCT was found to be of such low sensitivity that any type or scale of development would avoid a notable change in character.

Most of Edinburgh’s LCTs are of high or medium-high sensitivity for wind energy development, with only ’Lowland Farmland’ evaluated as of medium sensitivity for small to medium wind turbines (typically 50-149.9m blade tip height).

‘Lowland Farmland’ was assessed as medium sensitivity for small scale solar PV (under 5 hectares) and BESS (under 1 hectare), along with ‘Rolling Farmland’ and ‘Settled Farmland’ LCTs. All other LCTs were rated medium-high, with the Pentland Hills upper slopes and summits being highly sensitive.

Medium to large installations of solar PV (5-20 hectares extent) BESS developments (1-15 hectares extent) resulted in high sensitivity across the majority of LCTs, with ‘Lowland Farmland’ assessed as medium-high, suggesting some limited opportunity but with potential for significant landscape change.

These findings reflect the urban nature of the local authority, the more limited extent of its landscape resource and its value to recreation. The LSA also sets out landscape management guidelines to be considered in taking forward opportunities to realise renewable energy development.

The current Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE) 2020 identified opportunities for off-shore wind generation however this has been updated by the draft updated Sectoral Marine Plan for Offshore Wind Energy 2025 which contains a more up-to-date identification of opportunity areas and pipeline of projects from pre-planning through to being currently operational. This mapping is shown below in figure 07.5.

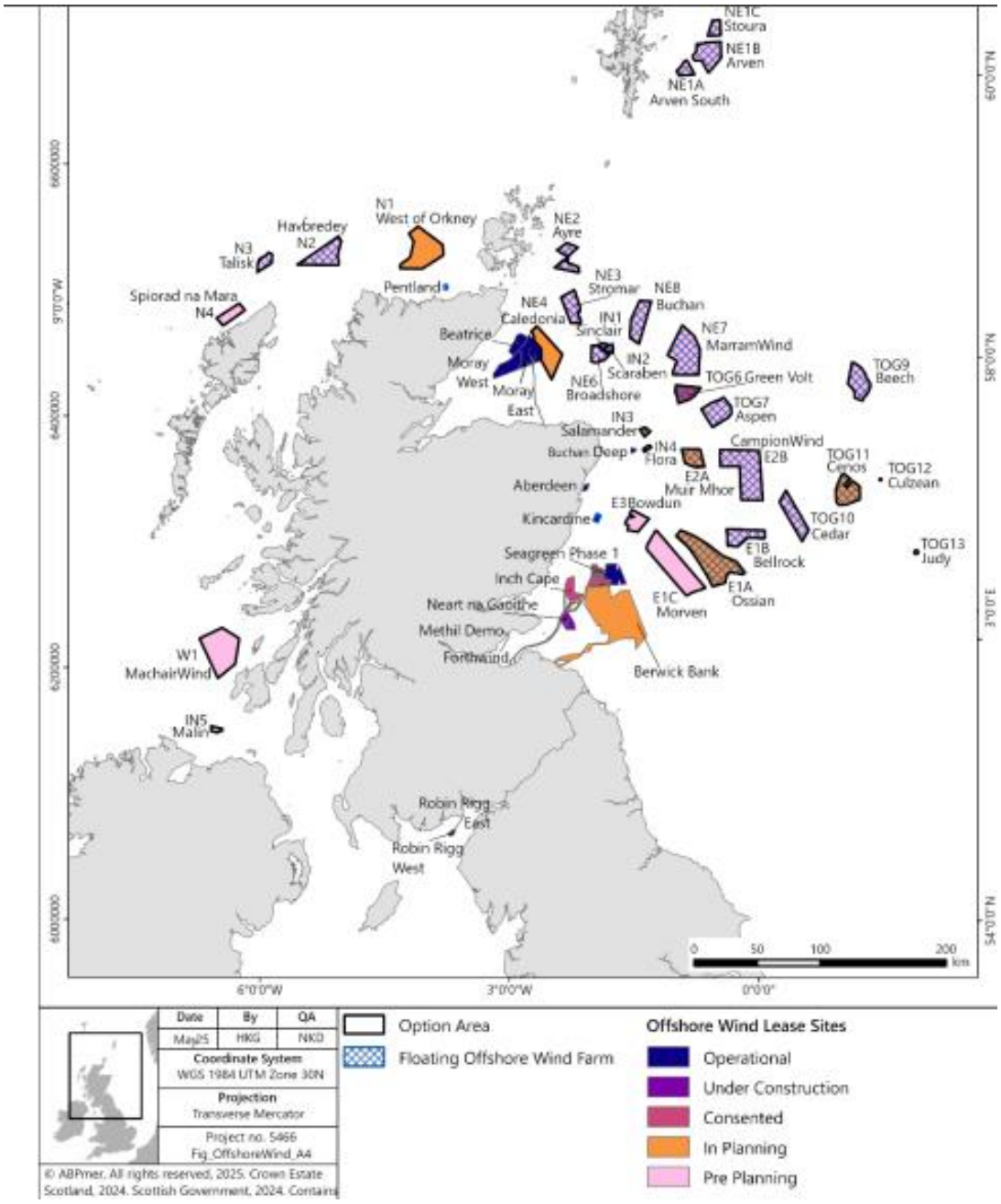


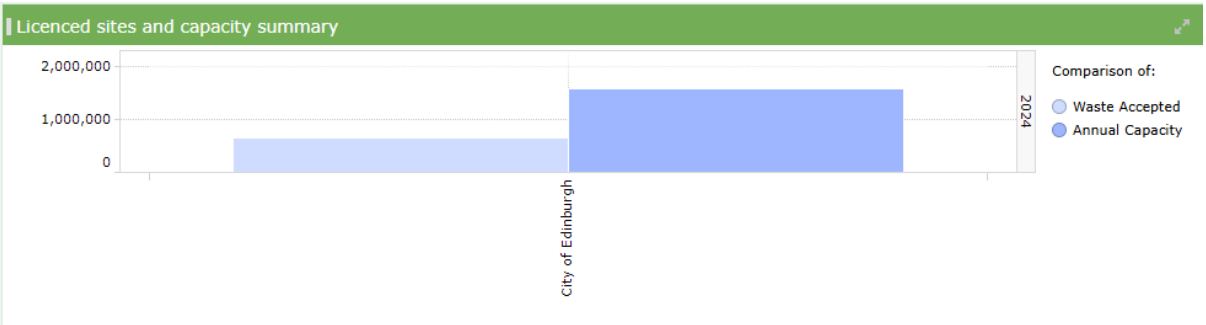
Figure 07.5: Map of Scotland's offshore wind pipeline, up to date at time of preparation of this draft updated SMP-OWE (March 2025). Areas outlined in black are the OAs included in this draft updated SMP-OWE.

There is a significant wind farm in the pipeline at Berwick Bank in addition to the Inch Cape and Neart na Gaoithe wind farms that are operational and under construction

respectively. These lie between 50km-100km east of Edinburgh's coastline but given the size of the wind farms and height of the turbines, there is some visual impact. In particular, it is noted that the Berwick Bank wind farm will be visible from some parts of Edinburgh but this impact is much less pronounced than it is for other local authorities such as Fife and the Borders.

Zero waste

NPF4 Policy 11 Energy notes the need for LDPs to identify new locations for waste management to support the circular economy and meet identified needs. Figure 07.6 below contains SEPA information from 2023 on capacities at facilities in the council area compared to the volumes of waste accepted.



Waste sites and capacity summary table

Site Activity	Year	Number of Sites	Annual capacity (tonnes)	Waste accepted (tonnes)
Civic amenity	2024	2	14,999	6,619
Civic amenity / Transfer station	2024	2	177,970	20,027
Composting	2024	2	82,050	39,691
Landfill (not operational)	2024	1	0	
Metal recycler	2024	8	184,769	57,342
Transfer station	2024	13	951,021	393,386
Transfer station / Anaerobic digestion	2024	1	145,000	120,143
Grand total		**29**	**1,555,809**	**637,208**

Figure 07.6: SEPA information on City of Edinburgh's licenced sites and capacity summary (note: some of Edinburgh's waste is transported outside of the council area)

Edinburgh has three household recycling centres at Seafield, Craigmillar and Sighthill. These are important for ensuring households can recycle a greater range of waste and goods as well as bulkier items or large volumes of refuse than cannot be dealt with by kerbside bins.

Edinburgh also publishes information on its website on what happens to collected waste. Recycled waste is sorted into different categories before being sent to various locations for productive use such as food waste to the Millerhill Anaerobic Digestion plant (located within Midlothian Council) to provide renewable electricity and fertiliser.

SEPA data on household waste covering 2023 shows 38% of Edinburgh's household waste was recycled with only 2% now being landfilled and that 40% is categorised by SEPA as being recovered by incineration to generate energy. This represents a

significant increase in performance compared to 2009 when 70% of waste was being landfilled.

Edinburgh's 'Recycling Rate Comparisons for Larger UK Cities' (updated August 2025)' was reported to the Council's Transport and Environment Committee on 11 September 2025. This notes that overall recycling performance has remained static at 38-40%. This is lower than cities in the UK, however this is significantly contributed to by the higher proportion of flats in Edinburgh compared to other UK cities. Flats tend to have lower recycling rates, including as a result of having lower amounts of garden waste which is the most recycled form of waste for Edinburgh and many cities.

Edinburgh's recycling rates for kerbside recycling from generally low-density housing are around 50% however the overall recycling rate is brought down by the effect of communal bin collections, recycling points, litter, bulky waste collections and household waste recycling centres.

A 2018 review of Edinburgh's Waste and Recycling Strategy sets out measures to further improve on increasing rates of recycling and decrease landfilled waste. Most measures would not be relevant to the plan and are not related to planning matters but there are some key elements highlighted below.

Edinburgh's non-recycled waste goes to the distinct Millerhill Recycling and Energy Recovery Centre (RERC) also located in the Midlothian Council area. It produces electricity from waste with the potential to enhance this as a heat source for district heating including for the City of Edinburgh. The planning and support of heat networks in Edinburgh, including close to the RERC could assist viability and delivery of a heat network in the area (see above section in this topic paper on heat networks).

Maximising commercial recycling is another area with potential to provide improvements in recycling levels. However, Appendix iii of Edinburgh's Waste and Recycling Strategy states 'it should be noted that there are practical barriers to providing such services - the Council's Trade Waste customers are often small premises with limited scope to store segregated waste streams.'

Summary of stakeholder engagement

Key Agency	**NatureScot**
Main views raised	• **Scoping (May 2025):** NatureScot commented that landscape character assessment should be considered to understand sensitivities to development.

	• **Draft Topic Papers (Nov 2025):** Meeting held with NatureScot to outline the scope of the Landscape Character Assessment and Landscape Sensitivity Assessment, alongside related studies. • **Final Topic Papers (March 2026):** No further comments on this topic.
Council response and Implications for the proposed plan	LCA, LSA and related studies shall inform the preparation of the Proposed Plan.
Is the agency content with the evidence?	NatureScot does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with NatureScot will take place in developing the Proposed Plan.

Key Agency	**Marine Directorate**
Main views raised	• **Draft Topic Papers (Nov 2025):** Raised the need for alignment between terrestrial and marine energy planning and licensing. There should be consideration of the National Marine Plan and explicit reference where appropriate.
Council response and implications for the proposed plan	The topic paper has been reviewed to ensure it appropriately considers and makes reference to the NMP and need for alignment between terrestrial and marine energy planning and licensing. The preparation of the Proposed Plan shall take on board relevant aspects of the NMP and need for alignment between terrestrial and marine planning and licensing

Is the agency content with the evidence?	Marine Scotland does not dispute any of the evidence set out in the topic paper. They have advised: 'the Marine Directorate are in general agreement that the evidence gathered is sufficient for our areas of consideration and have no issue / dispute to raise at this stage.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council shall continue to engage with the Marine Directorate in the preparation of the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** Three information sources are suggested for this paper: legislation, climate change committee and National Grid Electricity System Operator Limited (NESO). Comments about grid reinforcement are addressed in Topic 01d Infrastructure - energy and digital infrastructure. Comments about heat networks and the contribution of new homes to a just transition and Section 3F into the Town and Country Planning (Scotland) Act 1997 are dealt with in Topic 08 and 09 Climate change and climate mitigation Issues are raised about the benefits of greater housebuilding but these are addressed in Topic 12 Housing land.
Council response and implications for the proposed plan	NESO's 'Beyond 2030' publication is included in this updated topic paper. The other two evidence sources more directly relate to Topic 08 and 09 Climate change and climate mitigation and are addressed there. SPEN and developers will be engaged on the Proposed Plan, including to identify enforcements and upgrades associated with new home building.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.

Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	SPEN and developers shall be engaged on the proposed plan, including to identify enforcement and upgrades associated with new home building.

Other engagement and matters raised

Draft Topic Papers (Nov 2025):

SGN requested that biomethane be added alongside hydrogen in connection with proposals relating to their network.

The Council met with SGN and both parties agreed the Council shall continue to engage with SGN in relation to any proposals relating to their network, including hydrogen and biomethane.

Other:

Discussions have taken place with officers involved with the Council's LHEES to ensure up-to-date and appropriate information has been used in relation to heat networks, areas of heat demand and green data centres.

Summary of implications for the Proposed Plan

Heating and cooling

The Proposed Plan will need to consider how the Local Heat and Energy Efficiency Strategy influences the spatial strategy and consideration of possible development sites, including the nature and density of development proposed in different locations.

The Proposed Plan should consider the possibility of designating the Council area as an area of heat demand to help support application of NPF4 Policy 19d. This would enable identification of where Major and National developments generating surplus heat could provide heat and power plans showing use of recovered energy. The Proposed Plan may be able to promote opportunities to use surplus heat from new development by locating heat generating uses near to heat demanding uses.

The Proposed Plan may need to consider how development should be considered in the context of heat networks if Heat Network Zones cannot be established, given NPF4 policy is linked to Heat Network Zones.

Energy

The Proposed Plan can use the Landscape Sensitivity Assessment to consider what areas of opportunity might exist for defined types of energy development, including BESS, solar and wind energy. Consultation with NatureScot and review of electricity infrastructure and consultation with SPEN will be an important part of this process in addition to consideration of other factors, including Edinburgh Airport, and Protected Sites and Species (as set out in Topic Papers on Natural places and Biodiversity).

Zero waste

Monitoring and latest SEPA information on capacities at waste facilities and volumes of waste indicate that facilities in Edinburgh are operating within their licenced capacity. This will continue to be monitored and considered in the preparation of the Proposed Plan, including any potential need to provide or safeguard new/extended waste management facilities.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

08 and 09 Climate change and climate mitigation

Topic	**08 and 09 Climate change and climate mitigation**
Description of topic	Review the implications of information on climate change, including how to reduce overall emissions and make the area more resilient to the effects of climate change
Information required by the Act	Section 15(5) The principal physical and environmental characteristics of the district.
Relevant NPF4 Policies	• Policy 2 Climate mitigation and adaptation • Policy 3 Biodiversity • Policy 4 Natural places • Policy 5 Soils • Policy 6 Forestry, woodland and trees • Policy 10 Coastal development • Policy 20 Blue and green infrastructure • Policy 22 Flood risk and water management
Linked topic papers	• Topic 01a Infrastructure – transport • Topic 01d Infrastructure - energy and digital infrastructure • Topic 01e Infrastructure - water and waste water • Topic 02 Natural places • Topic 03 Green belt, countryside and rural • Topic 04 Water management, flood risk and coastal development • Topic 05 Biodiversity • Topic 06 Green blue infrastructure, open space and recreation • Topic 07 Zero waste, energy, heating and cooling • Topic 10 Historic assets and places • Topic 11 Design, quality and placemaking • Place Profiles
Local Development Plan Guidance	Information on local sources and scale of greenhouse gas emissions, where available. Details of local assets, infrastructure and opportunities for greenhouse gas sequestration, storage and utilisation; either nature based or technological, where available. This could include available information on expected emissions linked to proposals with planning permission that are yet to be constructed. Nature based sinks and stores are varied and include carbon rich soils and biomass such as trees and grassland. Technological sinks and stores are also varied and include negative emissions technologies and associated storage. Information about assets and opportunities for sequestration and storage may come through evidence regarding other policy topics including: energy;

	zero waste; sustainable transport; heat and cooling; digital infrastructure; flood risk management; and business and industry. The SEA is likely to be an important source of information to inform the evidence relating to climate change. In addition, the emissions reductions pathways set out in the updated Climate Change Plan may help to inform priorities and approaches. Details of climate risks likely to affect the plan area and the severity of these – both currently and in the future. Mapping these risks spatially is important to understand where there is variance in evenly felt effects and where this may increase inequality. This means understanding vulnerability and inequality is also important so that adaptation efforts can seek to tackle these inequalities. Vulnerability may be locational but also more societal, including: income deprivation; tenure; age; health; and strength of community networks. Evidence referenced in relation to other policies may be relevant including: local living and 20 minute neighbourhoods, quality homes, rural homes, health and safety, city, town, local and commercial centres. Infrastructure supporting adaptation may also be referenced. This will likely emerge through evidence on other policies including: biodiversity; natural places; soils; forestry, woodland and trees; brownfield, vacant and derelict land and empty buildings; coastal development; heat and cooling; blue and green infrastructure; flood risk and water management; and digital infrastructure. The SEA is likely to be an important source of information.
List of and links to evidence	• **CD219** Securing a Green Recovery on a Path to Net Zero Climate Change Plan 2018-2032; - Update, Scottish Government, December 2020 • **CD421** Progress in reducing emissions in Scotland – 2023 Report to Parliament, Climate Change Committee, March 2024 • **CD422** Scotland's Carbon Budgets: Advice for the Scottish Government, Climate Change Committee, May 2025 • **CD606** Scotland's Environment webpage, Scotland's Environment • **CD457** Quantitative Greenhouse Gas Assessment tool for Spatial Planning, European Observation Network for Territorial Development and Cohesion • **CD168** National Planning Framework 4 Research Project: lifecycle greenhouse gas emissions of NPF4 proposed

national developments: assessment findings, Scottish Government, November 2022,

- **CD605** Scottish Carbon Capture & Storage (SCCS) webpage, SCCS, 2026
- **CD135** Draft Energy Strategy and Just Transition Plan, Scottish Government, January 2023
- **CD083** 2030 Climate Strategy, City of Edinburgh Council, December 2021
- **CD263** City-wide Carbon Emissions and 2030 Climate Strategy update 9 January 2024, Appendix 2 - Citywide Emissions Reporting – Report to Policy and Sustainability Committee, City of Edinburgh Council, January 2024
- **CD289** Edinburgh by numbers 2024, City of Edinburgh Council, 2024
- **CD608** Scotland's Soils mapping, Scotland's Environment
- **CD467** Global Forest Watch information, Global Forst Watch
- **CD460** National Forest Inventory Scotland Open Data, Forestry Commission, 2023
- **CD126** Climate Change Plan: The Third Report on Proposals and Policies 2018-2032, Scottish Government, February 2018
- **CD033** City Plan 2030 Written Statement, City of Edinburgh Council, November 2024
- **CD214** Scottish National Adaptation Plan (2024-2029), Scottish Government, September 2024
- **CD420** Adapting to climate change - Progress in Scotland, Climate Change Committee, November 2023
- **CD423** Climate change risks and opportunities: Edinburgh Phase 1 summary, Climate Ready South East Scotland, April 2025
- **CD127** Climate Ready Scotland: Second Scotland's Climate Change Adaptation Programme, Scottish Government, September 2019
- **CD612** Drought risk assessment tool, SEPA, 2026
- **CD627** Scotland's National Water Scarcity Plan, SEPA, updated January 2025
- **CD630** SEPA Planning Advice Note for Planning Authorities – LDP Evidence Gathering: Water Scarcity, SEPA, March 2025
- **CD6345** Water Scarcity webpage, SEPA
- **CD416** Private Water Supplies and Climate Change, Centre of expertise for waters (CREW), 2020
- **CD417** Water Scarcity in Scotland: A Knowledge Review - Climate Crisis: informing Scotland's actionable mitigation and adaptation response to water scarcity, CREW & University of Dundee, November 2023
- **CD415** Future Predictions of Water Scarcity in Scotland: Impacts to Distilleries and Agricultural Abstractors, Centre of Expertise for Waters (CREW), June 2024

- **CD414** A review of the risks to water resources in Scotland in response to climate change, Centre of Expertise for Waters (CREW), 2022
- **CD668** Summary of the Climate Trends, Future Projections and Extremes in Scotland, The James Hutton Institute, July 2023
- **CD566** Anticipating and mitigating projected climate-drive increases in extreme drought in Scotland, 2021-2040, NatureScot, 2021
- **CD633** Water Classification Hub, SEPA
- **CD191** Scotland's Climate Change Plan: 2026-2040, Scottish Government, March 2026
- **CD323** Scottish Indices of Multiple Deprivation (SIMD) webmap, Scottish Government & Ordnance Survey, 2020
- **CD444** Climate Action Map, Edinburgh Climate Change Institute
- **CD424** Southeast Scotland Coastal Change Assessment, CRSES, April 2025
- **CD542** UK and Global extreme events – Wind storms, Met Office
- **CD425** Current and Future Windstorms in Scotland, ClimateXchange, 2023
- **CD089** Edinburgh Local Heat and Energy Efficiency Strategy (LHEES), City of Edinburgh Council, December 2023
- **CD087** Air Quality Action Plan, City of Edinburgh Council, January 2024
- **CD066** Non Statuory Guidance - Edinburgh Design Guidance, City of Edinburgh Council, September 2025
- **CD461** Valuing Edinburgh's Urban Trees - An update to the 2011 i-Tree Eco survey – a report of Edinburgh City Council, Forestry Commission Scotland, and Forest Research, 2017
- **CD036** Strategic Flood Risk Appraisal webmap, City of Edinburgh Council, April 2024
- **CD548** Strategic Flood Risk Appraisal methodology report, Mott MacDonald April 2026
- **CD032** Evidence Report consultation response from University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast (updated 30th March 2026)
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023

List of matters covered

Climate mitigation and adaptation are cross-cutting topics that require consideration across different parts of strategy, site allocation and policy. As a result, some elements are covered through other topic papers within the Evidence Report.

Links are made to these topic papers alongside additional data not covered elsewhere. This is drawn together to give overarching implications for the Proposed Plan.

This topic paper considers the following issues:

- National policy context
- Regional policy context
- Local policy context
- Climate issues facing Edinburgh
- Climate resilience
- Implications for the plan

Summary of evidence

National

The Scottish Government's Climate Change Plan: The Third Report on Proposals and Policies 2018-2032 notes that Scotland is already beginning to experience the effects of a changing climate, with even more serious impacts being faced across the world, especially for communities that are already vulnerable. The Climate Change Plan addresses NPF4 and multiple relevant outcomes: reducing emissions; building resilient communities; 20 minute neighbourhoods and peatland protection and emissions.

Scotland's Environment collates and provides a comprehensive range of information across a number of environmental issues including climate change. It notes that Scotland's 10 warmest years on record have all occurred since 1997 and that the average temperature between 2010-2019 was around 0.7°C warmer than the 1961-1990 average. Peak rainfall events have also increased and the average UK sea level has risen approximate 1.4mm per year since the start of the 20th century.

The Scottish Government's 'Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero' sets out that 'a green recovery is our commitment to transition to net zero emissions in a way that is just, and that delivers a thriving, sustainable economy that works for all of us.'

The Climate Change Committee's 2023 report to Scottish Parliament on Scotland's progress in reducing emissions notes that Scotland's emissions rose by 2.4% in 2021 compared to 2020. This was 'driven by an increase in surface transport emissions following the pandemic, and in buildings emissions, with colder than average temperatures contributing to the rise.'

Following on from this, the Climate Change Committee produced Scotland's Carbon Budgets: Advice for the Scottish Government. This sets out the key sectors needing to be decarbonised in Scotland and the pathways for doing this. In particular, the Carbon Budgets note the need to electrify via technologies such as heat pumps

combined with continuing to decarbonise electricity generation. The Budgets also make clear that emissions reductions from surface transport will be critical to achieving decarbonisation, with scaling up electric vehicles and modal shift away from cars being vital to this. Emissions reductions from buildings will also be important.

Scotland's National Flood Resilience Strategy (NFRS) sets out a vision that people and places are ready for increased flooding and adapting to climate change in an inclusive and fair way. Although the issue of flood risk is principally addressed in Topic 04 Water management, flood risk and coastal development, the NFRS is relevant here since this paper considers resilience to this changing context of risk.

The Scottish National Adaptation Plan (SNAP) (2024-2029), Scotland's Climate Change Adaptation Programme, Adaptation Scotland note that climate change and extreme weather events are already impacting Scotland across many different aspects of society and environment. In its key messages on climate change, Scotland's Environment notes that recent times have shown Scotland has become warmer, with changing rainfall patterns and rising sea levels. The extent and intensity of this change and impact is only projected to increase in future with more peak rainfall events, flooding and heatwaves. SNAP 2024-2029 notes the role of planning and Local Development Plans (LDPs) in addressing adaptation when it states, 'development planning (including Local Development Plans and associated delivery programmes) takes current and future climate risks into account and is a key lever in enabling places to adapt.'

Reporting from the UK Climate Change Committee on UK and Scotland emissions reduction progress; climate risks; and adaptation and Adapting to climate change - Progress in Scotland (2023) notes that 'overall progress on adapting to climate change in Scotland remains slow.'

Regional Context

Climate Ready South East Scotland (CRSES) is the regional partnership of local authorities covering the South East Scotland area, including Edinburgh. It identifies and prioritises the risks and opportunities in relation to climate change, emphasising that adapting to climate change should be seen as part of a positive evolution to the area which can help it thrive as well as protect its people and environment. It also forms part of the Regional Prosperity Framework.

Local Context

The City of Edinburgh Council declared a climate emergency in 2019. There are a number of key Council strategies and policies which seek to address this.

The Edinburgh 2050 City Vision sets out sustainability as one of the 12 key themes for Edinburgh. Edinburgh's 2030 Climate Strategy addresses this further and recognises climate change as the biggest threat facing our planet and is why the

Council has declared a climate emergency. It also sets the ambitious target for Edinburgh to become a net zero city by 2030.

2030 Climate Strategy: Delivering a net zero, climate ready Edinburgh draws attention to many of the same issues as the Climate Change Committee but focuses on Edinburgh. It notes that, for Edinburgh to meet its own net zero ambitions, it needs to focus on key areas such as decarbonising transport and the energy our buildings use. It also emphasises the need to do this as part of a just transition which makes the transition to net zero in a way that also tackles poverty and inequality and maximises job creation and co-benefits so that everyone can share in the city's success.

Edinburgh 2030 Climate Strategy and Climate Ready Edinburgh both recognise that increasing resilience is important to make Edinburgh more adapted to climate change, however they also can make Edinburgh greener and fairer at the same time.

Climate issues facing Edinburgh

Edinburgh faces a range of climate issues. Broadly these fall into two categories:

- What can Edinburgh do to reduce, store and capture greenhouse gas emissions that are contributing to climate change?
- How can Edinburgh be resilient to future climate change?

Reducing greenhouse gas emissions like carbon dioxide (CO2) is often referred to climate mitigation. This is the first issue that is considered in this topic paper by looking at the sources of Edinburgh's emissions and how these can be reduced. It is also important to look what assets in Edinburgh that are storing CO2 presently so these can be protected and where additional opportunities may exist to capture further CO2.

Being resilient to climate change firstly requires an understanding of what aspects of the climate are expected to change and the ways this could cause problems for people, places and nature. Overall, Climate Ready Edinburgh projects the main changes to Edinburgh's climate as shown in figure 8/9-1 below.

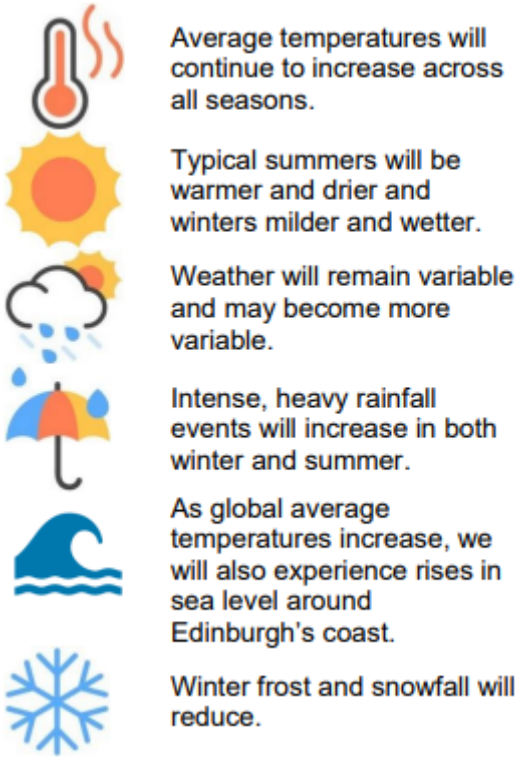


Figure 08/09.1: Long-term projected climate trends for Edinburgh (source: Climate Ready Edinburgh)

The figure above shows that temperatures will increase across all seasons, with this causing particular issues in summer which are projected be dryer whilst winters become wetter. Across winter and summer, the rainfall events that do occur are expected to be more intense. Edinburgh will experience rises in sea level affecting coastal areas.

These factors create climate risks for the council area. Large urban areas like Edinburgh are more severely impacted by rising temperatures due to the heat island effect where buildings and roads typically absorb more heat than vegetation. Higher concentrations of people requiring more water are inherently more vulnerable to drought. Large, dense urban areas are also more vulnerable to flooding where more intense rainfall has less porous areas to drain into. Edinburgh has further issues caused by many places still containing culverted watercourses and old, combined sewer systems which cannot handle high water volumes. Edinburgh's significant extent of developed coastline also increases vulnerability to sea level rise and compounding coastal factors like more intense storms.

Making Edinburgh less vulnerable to these risks is therefore very important and is sometimes called climate adaptation or resilience. Edinburgh does face challenges to becoming more resilient, however. The city has limited space and its significant built heritage means adaptation measures such as retrofitting green blue infrastructure like trees, green roofs and open space into the existing urban environment can be difficult.

What are the sources of Edinburgh's emissions we need to reduce?

Understanding the sources of greenhouse gas emissions in Edinburgh is the starting point to reducing them.

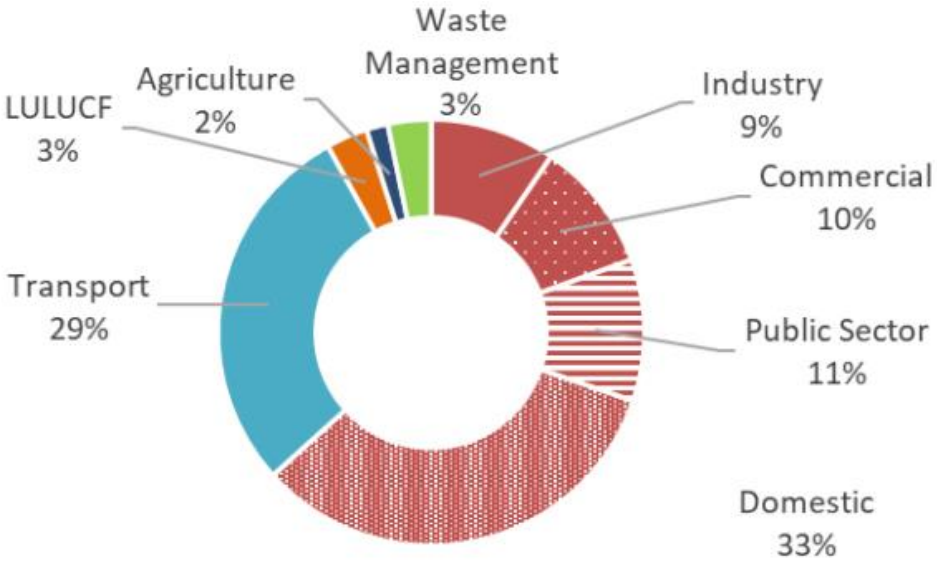


Figure 08/09.2: Breakdown of emissions in Edinburgh in 2023(source: 9 January 2024 report to Policy and Sustainability Committee on City-wide Carbon Emissions and 2030 Climate Strategy)

Figure 8/9-2 shows the emissions from transport (29% of emissions) and energy needed to heat and power homes (33%) are responsible for nearly two thirds of all overall emissions. These areas are key priorities that need to be tackled to achieve further emissions reduction.

Figure 8/9-3 below shows Edinburgh's sources of greenhouse gas emissions by sector as of 2021 and how these have changed since 2005. In line with established practice, figure 8/9-3 converts these greenhouse gas emissions into the metric of CO2 equivalent (CO2e) in terms of the warming effect of different greenhouses gases to allow for comparison. The graph also shows a target pathway for continued reduction that would be needed to achieve a net zero level of emissions from all sources by 2030.

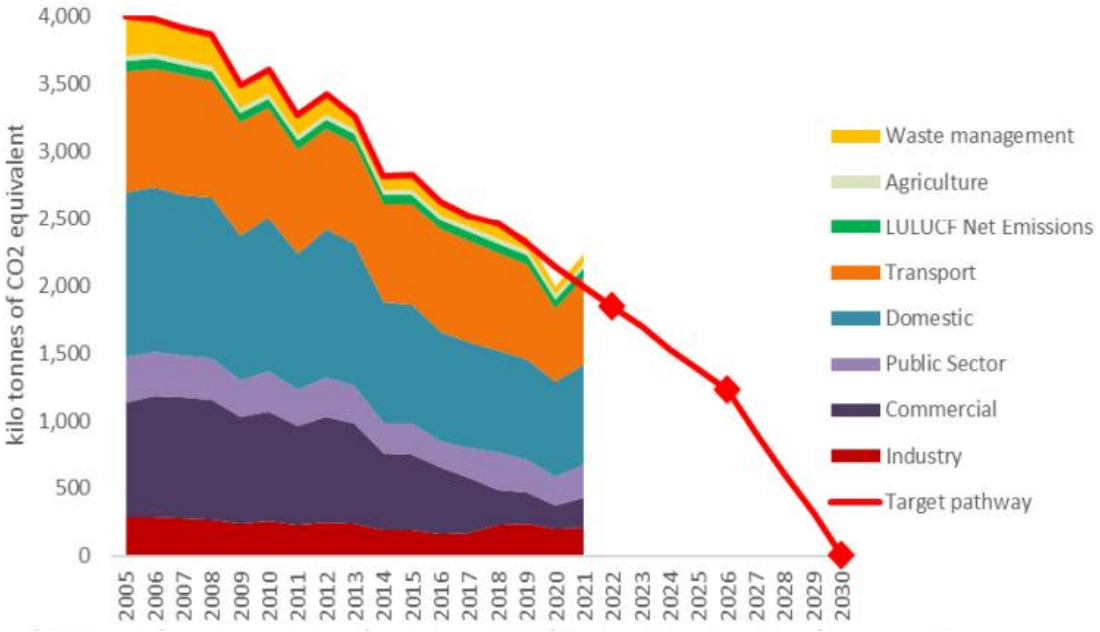


Figure 08/09.3: Edinburgh's emissions by sector over time. LULUCF = Land use, land use change and forestry (source: 9th January 2024 report to Policy and Sustainability Committee on City-wide Carbon Emissions and 2030 Climate Strategy)

Figure 8/9-3 graph shows overall levels of emissions in Edinburgh have fallen significantly from circa 4000 kilo tonnes CO2e the period 2005 to around 2300 kilo tonnes CO2e in 2021. Many sectors have seen reductions over this time, although emissions in the commercial sector have been especially pronounced.

The year 2020 showed a marked drop in emissions, with this correlating to the effect of the Covid pandemic and period of lockdown. There is a partial rebound following this in 2021 but overall emissions were still down on pre-Covid levels.

More recent data from Edinburgh by Numbers 2024, which includes data for 2022, shows a fall from 2286 kilo tonnes CO2e in 2021 to 2192 kilo tonnes CO2e in 2022. This shows a return to the broader trend of gradual reduction with emissions following the Covid pandemic.

Transport is a particular problem- as seen in figure 8/9-3 - as it has seen a comparatively slower level of emissions reduction from 2005 levels compared to other emissions sources. Data shown in Edinburgh by Numbers 2024 shows transport as one of the few sectors where emissions actually rose from 2021 to 2022 against the general downward trend.

Overall, there is still a need to further reduce emissions significantly to achieve Council and national objectives to reach net zero. Bringing down emissions from transport and from heating and energy for buildings is especially important to this.

The Proposed Plan will have a key role in tackling many of these sources, including the more significant sources such as transport, energy and heating. Opportunities to reduce these sources are explored further in the sections below.

Transport emissions

The use of petrol and diesel, especially in private car travel, mean transport contributes to a significant amount of Edinburgh's emissions shown in figure 8/9-2 and 8/9-3. Reducing private car travel and decarbonising the energy source of vehicular travel in general therefore represent key objectives to reduce transport emissions. The following areas are identified as key ways to cut these emissions:

- Public transport: Ensuring Edinburgh is connected by a safe, efficient and more inclusive net zero public transport system, including its bus, tram and rail network

- Electric Vehicles: encourage the switch to cleaner vehicles by supporting the growth of EV infrastructure, including the development of a citywide charging network and monitoring progress in other low and zero emission technologies. This includes transitioning to zero emission buses

- Active travel: improve walking, wheeling and cycling in Edinburgh to make Edinburgh a city where these options are the natural first choice for the shortest journeys

- Freight: SEStran's 2022 Go Forth Freight Study Case for Change set out the options of using trams and trains to reduce emissions associated with the use of heavy and light goods vehicle for freight haulage

- Parking standards: A key mechanism for reducing car use and ownership is the parking standards in the Edinburgh Design Guidance that set out the maximum levels of parking allowed in new developments. These were updated in September 2025 and set parking levels across three areas of Edinburgh, linked to availability of alternative modes of transport to car:

    - City centre zone – generally no parking is allowed in new development
    - Zone 2 – covers most of the urban area outside the city centre, some parking is permitted
    - Zone 3 – rural areas of Edinburgh and other areas with low levels of public transport availability.

Further information on the actions above and other transport related emissions reduction opportunities is set out Topic 01a Infrastructure - transport.

The Proposed Plan can assist with these measures above in a range of ways, including considering locations for development so that they minimise the need to travel in an unsustainable way and improving access to key amenities as part of 20-minute neighbourhoods across the city including new developments. Topic 15 Local living and the Place Profiles have more information on this.

Emissions from buildings

Figures 8/9.2 and 8/9.3 show over half of Edinburgh's greenhouse gas emissions are from domestic, public sector, commercial and industry sectors. Emissions associated with buildings is a common issue across each of these sectors. Given the number of residential buildings in the council area, it is unsurprising that domestic emissions are a particular issue and mean homes contribute to more emissions than public sector, commercial and industry sectors combined.

Heating buildings is a significant source of these emissions. Effective insulation of buildings can help significantly to minimise the heat needed and can enable heat sources with zero direct emission (ZDE) to be used like air source heat pumps.

Thermal performance of buildings is explored further in Topic 07: Zero waste, energy, heating and cooling. However, the map in Figure 8/9.4 shows the homes with uninsulated walls as taken from Edinburgh's Local Heat and Energy Efficiency Strategy. The areas of darkest blue are areas with the least insulation, with lighter areas having more insulation.

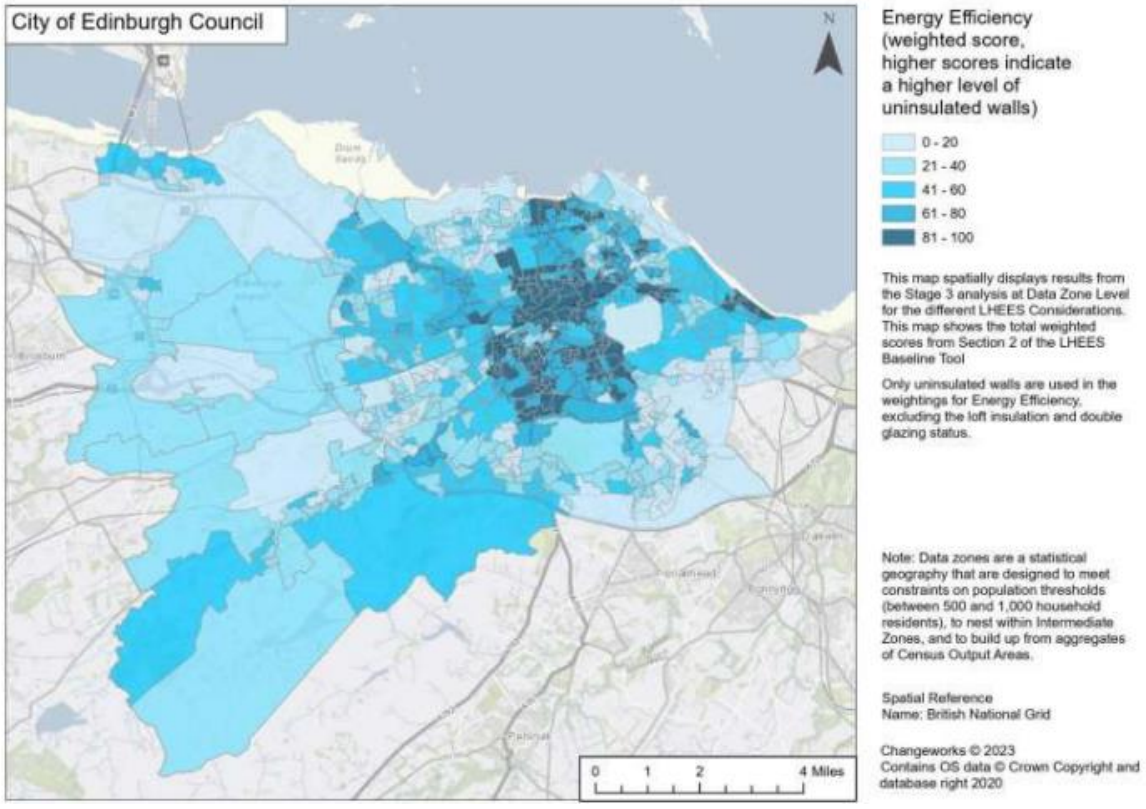


Figure 08/09.4: Homes with uninsulated walls (source: Edinburgh's LHEES)

The map illustrates that the centre of Edinburgh has a significant proportion of uninsulated homes. This correlates to areas typically containing Edinburgh's older and historic properties. This represents a challenge to improving efficiency as older buildings have greater difficulties improving their efficiency as well as possible heritage-related restrictions to improvements. For example, applying external insultation on a listed building could have significant effects on its heritage value. The number of flatted properties also make building-wide improvements more difficult to achieve.

Outside of central areas, homes are generally better insulated although there is still some variation. For example, Portobello in the east and Newhaven to the north (which also contain a number of historic buildings) have more poorly insulated properties contrary to the trend of better performing homes found to the south, north-west and south-west of the city.

The Proposed Plan may need to consider how it could support or encourage improving insulation in existing building stock, in combination with decarbonised heating.

Heating buildings

Burning fossil fuels like gas provides heating for most of Edinburgh's buildings, including over 90% of its homes. Burning fossil fuels emits significant greenhouse gas emissions. Transitioning to alternative heating sources is key to reducing emissions.

Topic 07 Zero waste, energy, heating and cooling sets out how the Edinburgh's LHEES (Local Heat and Energy Efficiency Strategy) analysed a range of factors such urban density, property types and their thermal performance in order to propose appropriate, alternative heat sources that would help reduce emissions whilst still providing sufficient heating for the city.

In cases where buildings were well insulated and were less constrained by heritage, property type and space constraints then the LHEES generally recommends ZDE heat sources like air source heat pumps (ASHPs) as these can provide adequate heating without drawing on external heat sources. They do need electricity to operate however. This requires additional electricity from the grid unless this can also be provided on-site, e.g. through solar PV on roofs. The LHEES generally recommends ASHPs in lower density areas as these have higher proportions of roofspace available and single property ownership.

In other locations, different heating solutions are recommended. This includes 'heat network zones.' These zones would be the focus for establishing heat networks providing heating and hot water for many properties from strategic heat producing sources. Often these heat sources utilise surplus heat from existing sources which means no additional fuel is burned to heat homes. The map in Figure 8/9.5 shows the refined initial heat network zones in Edinburgh (taken from LHEES).

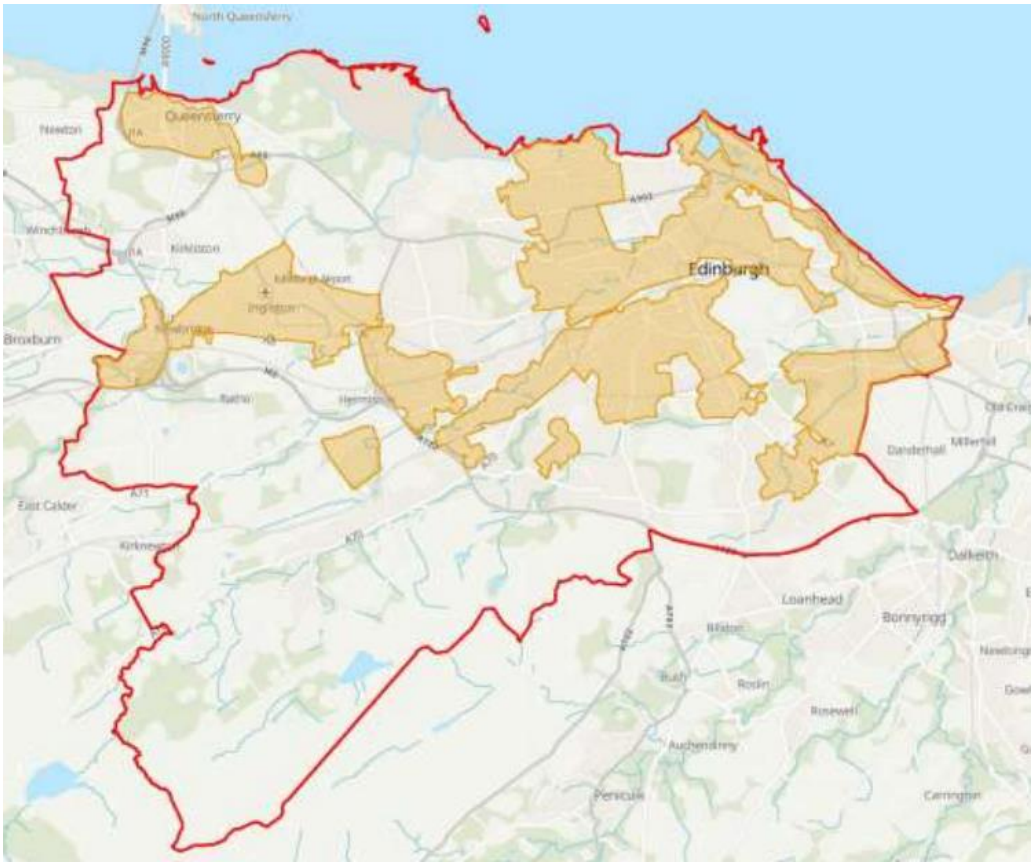


Figure 08/09.5: Refined initial heat network zones in Edinburgh (source: LHEES)

These prospective heat network zones identified have significant overlap with Edinburgh's most deprived areas based on the Scottish Index of Multiple Deprivation (SIMD). Gilmerton and Burdiehouse to the south-east of the city, Pilton, Granton and Drylaw to the north and Wester Hailes to the west are all deprived areas identified as heat network zones.

Topic 07 Zero waste, energy, heating and cooling covers the issue of heating in further depth, including how surplus heat from new developments should be utilised through heat and power plans to explore alternatives to gas heating across Edinburgh.

Renewable energy

Scotland and Edinburgh's electricity supply has made significant progress in reducing greenhouse gas emissions by reducing the amounts of fossil fuels like coal and gas that are burned to produce power. This electricity supply still involves some emissions so there is a need to provide additional electricity generation from renewable sources like solar panels which do not generate emissions. In addition, additional renewable energy sources are needed to meet the extra demand for electricity in the future, for example to deal with the transition to electric vehicles.

Battery Energy Storage Systems (BESS) are also needed to provide the electricity grid with additional storage capacity to accommodate fluctuations in energy supply

that occur with renewable energy. For example, solar panels generate most their power during sunny spells but less at cloudy times. At these times, the supply of energy may exceed demand. BESS allow surplus energy to be stored so that it can then be supplied at other times when demand exceeds supply, for example at darker times of the day.

In terms of where Edinburgh may have potential to locate renewable development, attention is focused wind turbines and solar photo voltaic (PV) as two of the most significant forms of renewable energy development in Scotland. To provide significant levels of energy however these turbines and solar panels arrays need to be a size that requires a certain level of space and this means the urban areas of the city are not considered suitable.

This means the focus is on Edinburgh's non-urban area. To explore this issue, a Landscape Sensitivity Assessment (LSA) 2026 has been undertaken based on the Council's updated Local Landscape Character Assessment as set out in Topic 2 Natural Places.

The LSA considers the sensitivity of different landscape typologies within the council area to wind and solar power installations and battery energy storage systems (BESS). Landscapes with lower sensitivity to these forms of development may provide more opportunities for renewable energy infrastructure. Opportunities would be more limited in areas of higher sensitivity.

Topic paper 07 Zero waste, energy, heating and cooling explores renewable energy in more depth and outlines the findings of the LSA and whether certain landscape typologies within the council area could accommodate wind and solar power installations and battery energy storage systems (BESS) or where there would be adverse landscape and visual impacts.

Existing carbon stores: soils, trees and woodland

Edinburgh has environmental features that contained 'stored' greenhouse gas emissions, particularly its trees, soils and peatland. It is important to protect these areas to avoid releasing the emissions they contain into the atmosphere.

Mapping from Scotland's soils show concentrations of organic carbon in topsoil. The map in Figure 08/09.6 illustrates how this varies across the council area. The darker the brown shading, the greater the concentration of organic carbon stored in the topsoil. The higher the carbon concentration, the more carbon is stored in the topsoil and the greater value there is in preserving this in-situ. Disturbance of this, for example through construction, can result in exposure of organic CO2 to oxygen and result in release of CO2 into the atmosphere.

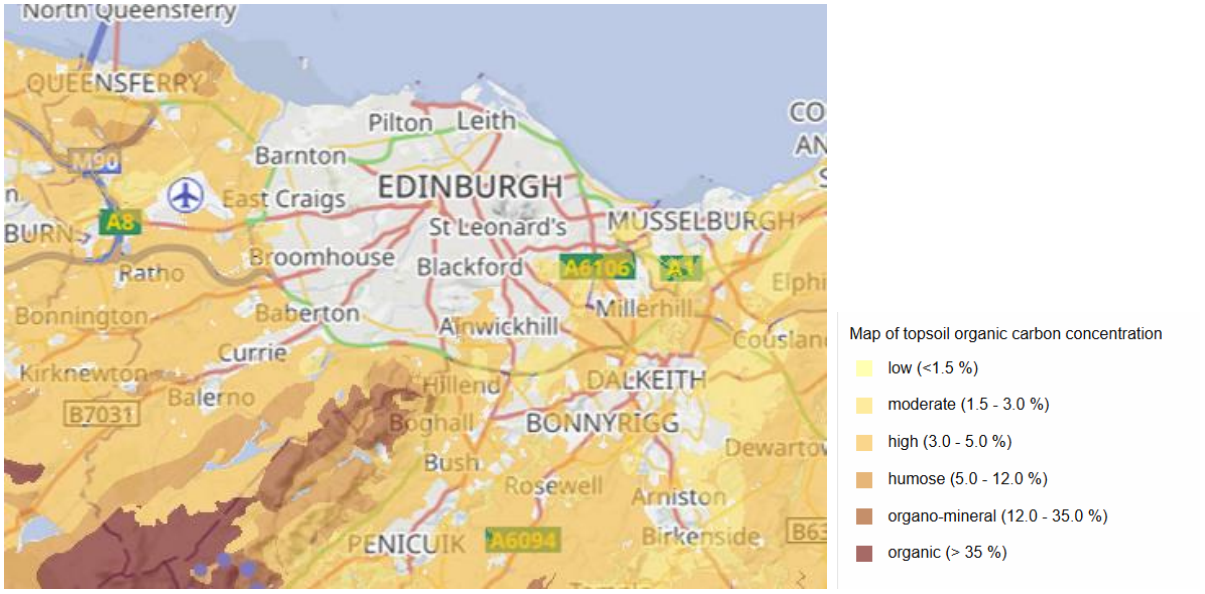


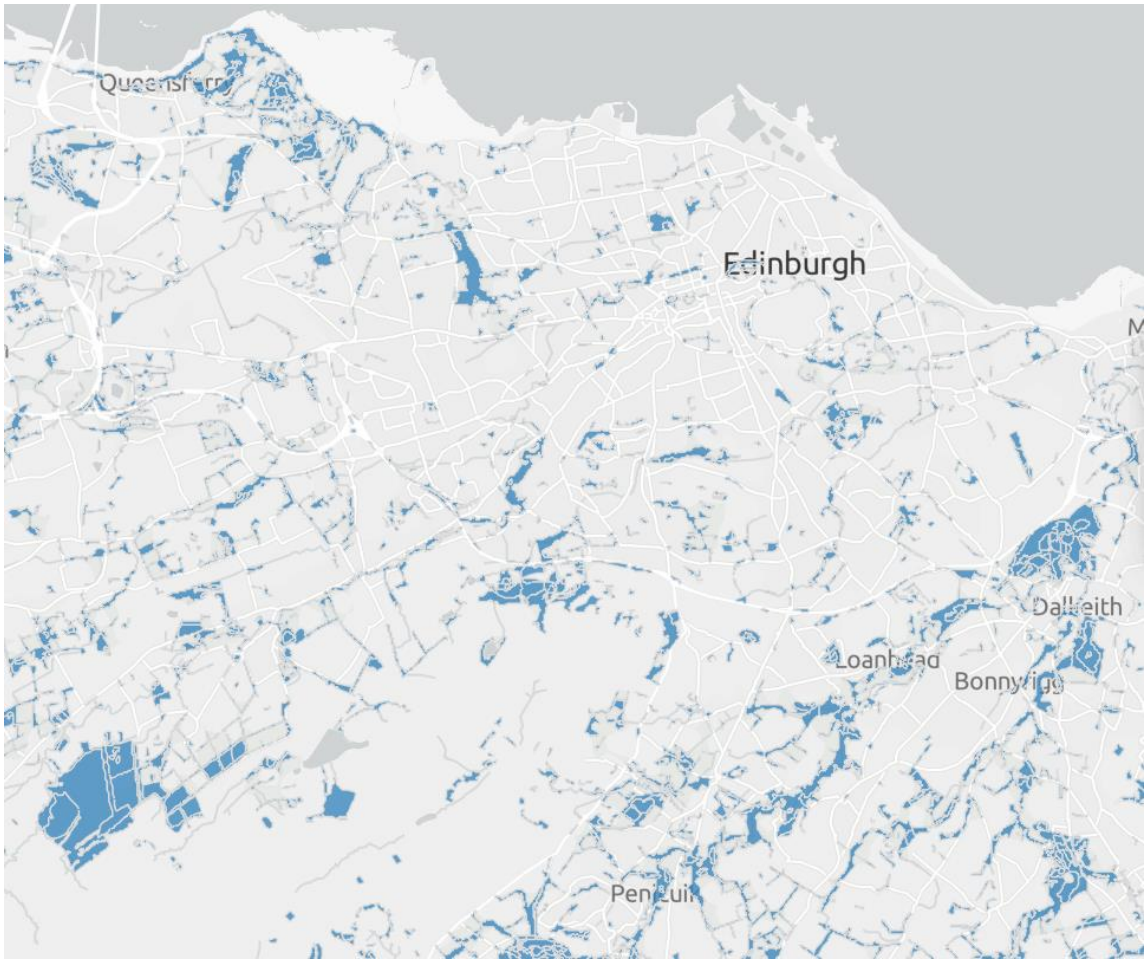
Figure 08/09.6: Scotland's Soils mapping of organic carbon concentrations in topsoil for the Edinburgh area (note: grey areas are urban area).

The map shows that most of the non-urban council area are storing a 'high' concentration of carbon concentration (between 3-5%). There are some smaller pockets of 'moderate' value storing concentrations between 1.5-3%, for example east of Kirkliston. The area of the Pentland Hills has particularly high value for carbon storage with some areas being in excess of 35%.

In these areas, it is particularly important to avoid ground excavation and disturbance to avoid the stored carbon from oxidising and being released into the atmosphere as CO2.

Trees and woodlands also offer value in terms of taking carbon dioxide from the atmosphere. As of 2000, City of Edinburgh had an aboveground live woody biomass density of 130 t/ha, and a total above ground biomass of 570 kt. Over the period 2001 to 2025, this 'forest' removed a net total of 23,000 tonnes of CO2e each year.

The mapping below from Forestry Commission Open Data showing the National Forest Inventory Scotland 2021 highlights areas of notable tree coverage in Edinburgh. These are shown in blue in map 8/9-5 below.



Map 08/09.7: National Forest Inventory Scotland, Forestry Commission Open Data, 2023

The mapping shows Edinburgh has a variable distribution of tree coverage, both within its urban area and in its surrounding green belt and countryside. For example, the Dalmeny Estate north west of the city has a good level tree cover as does the land around Dundas Castle (south-west of Queensferry). Within the urban area, Corstorphine Hill is a particular example of good tree coverage. There is also good tree coverage south of the city at Bonaly Country Park and at Buteland Hill near Balerno although much of this is conifer plantation and transient in nature.

The most recent i-Tree survey of the city, updated in 2017, found that Edinburgh has a 17% urban tree cover, with an average urban tree density of 62 trees per hectare. Many of these trees are found in parks and residential areas with the Council actively working to plant more trees to improve air quality, create habitats for wildlife and crucially meet the challenges of climate change. An updated i-tree survey was undertaken again in 2025, with survey work undertaken by Forest Research. Outputs and analysis from this work is expected in May 2026.

City Plan 2030 Policy Env 20 Protection of Trees and Woodland updated previous policy on tree protection. Amongst other changes, the policy recognises the value of

trees in providing carbon sequestration and provides specific detail on information and justification requirements for an Edinburgh context.

The importance and value of trees is explored further in Topic 02 Natural places but the Proposed Plan will need to explore the protection of the city's trees.

Opportunities for new carbon storage

In addition to protecting existing stores of greenhouse gasses, there are opportunities for additional greenhouse gasses to be captured and stored. This includes planting further trees and sequestering further atmospheric carbon dioxide.

Figure 8/9.8 shows mapping from Scotland's Soils illustrating areas of most capability for forestry. The majority of the land to the west and north-west of Edinburgh is graded F2 which means it has very good flexibility for the growth and management of tree crops. It should be noted that this only indicates suitability of the soil for forestry. There are other considerations that are relevant such as the same areas of land may also be suited to agriculture or have landscape constraints. Topic 02 Natural Places has further information on this.

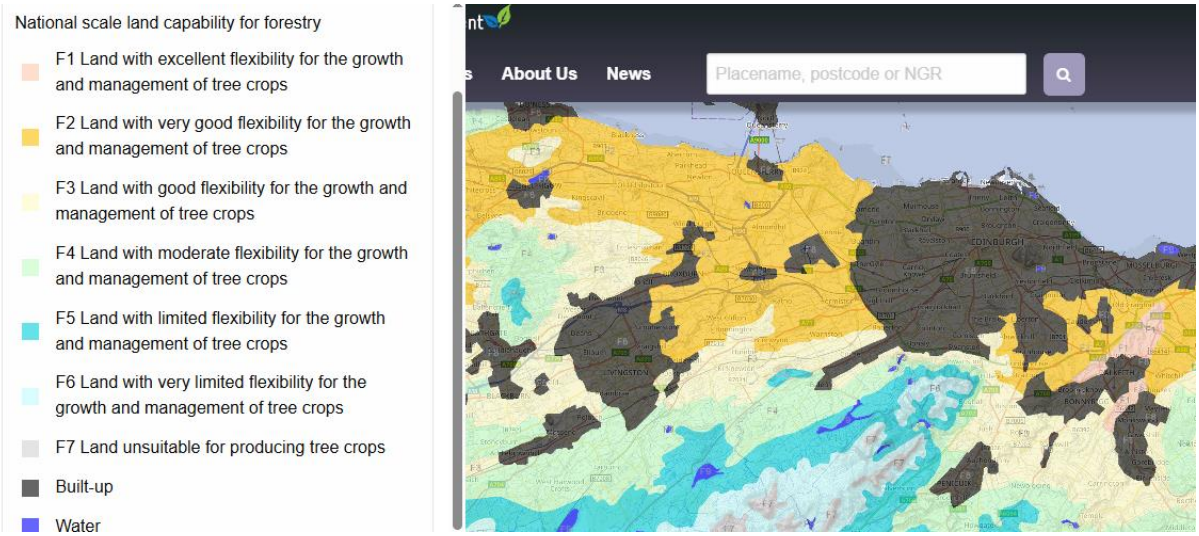


Figure 08/09.8: The areas of most capability forestry (source: Scotland's Soils, 2026)

The Scottish Carbon Capture and Storage (SCCS) website provides mapping and information on carbon capture and storage projects across Scotland. There are no relevant projects identified in the Edinburgh area presently however this will be monitored for any updates.

Climate resilience

Even with reducing emissions, climate change is already taking place and will continue to occur to an even greater extent in future. This is expected to result in a range of impacts on Edinburgh.

The following sections explore the climate risks Edinburgh is predicted to face which are particularly relevant to planning.

Biodiversity is significantly vulnerable to climate change more generally and this is addressed in Topic 5 Biodiversity.

Vulnerability to Flooding

The broader issue of flood risk, including allowance for climate change, is addressed in Topic 04 Water management, flood risk and coastal development but a brief overview is provided here.

A Strategic Flood Risk Appraisal (SFRA) has been produced to support the Evidence Report. This takes the form of a webmap which is supported by a methodology note. In addition to identifying areas of flood risk based on current climatic conditions, the SFRA also identified additional areas at risk based on SEPA's recommended climate change allowance. This 'future' flood risk can be split into 'critical' future risk and 'non-critical' future risk based on how much of a constraint the risk poses.

The SFRA shows that future critical flood risk introduces additional areas of flood risk beyond those at 'critical' risk under current climatic conditions. There are two main areas within or adjacent to urban areas noted here. Firstly, there is an area of critical future risk along Edinburgh's boundary with West Lothian at the north-eastern edge of East Calder. Secondly, there is an area at the waterfront where the Water of Leith reaches Leith docks. This area of future critical risk area broadly follows the route of the A199, mostly to the east, and covers some of the adjoining urban area and streets to the north and south of this road.

There are also some additional areas of non-critical risk when comparing future climatic conditions to current conditions. The main areas additionally affected by future non-critical risk are along the coast, including parts of Leith docks, Granton Harbour and Western Harbour.

Edinburgh has several neighbourhoods where overlap between flood risk (with climate change allowance factored in) and social disadvantage occurs. In particular, the south-west of the city primarily the areas along the Water of Leith, Leith waterfront and to the south east of the city at Little France.

Topic 04 Water management, flood risk and coastal development outlines the implications for the Proposed Plan with regard to flood risk.

Coastal change

As with general flood risk, coastal change is addressed in more detail in Topic 04 Water management, flood risk and coastal development. A shorter overview is provided here.

A range of coastal change processes are expected to cause compounding detrimental effects to the coastline of the council area. This includes, but is not limited to, sea level rise, erosion and coastal flood risk events with the additional effects of storm surge and wave overtopping.

CRSES Coastal Change Assessment – South East Scotland used mapping of a range of types of human and environmental receptors (e.g. shops, tram routes, local scenic areas) in relation to the projected impact of erosion, sea level rise and coastal flood risk with climate change allowance factored in. Coastal flood risk with climate allowance factored-in was projected to affect a significant number of assets. In fact, a 'medium' severity event (1 in 200-year event) with climate change allowance factored in was projected to impact more assets even compared to a more severe 1 in 1000-year event under current climatic conditions.

The assessment modelled two 'bathtub' scenarios for the year 2300. These show the extent of existing land which would be flooded by sea water with 3.5m and 8.2m of sea level rise respectively.

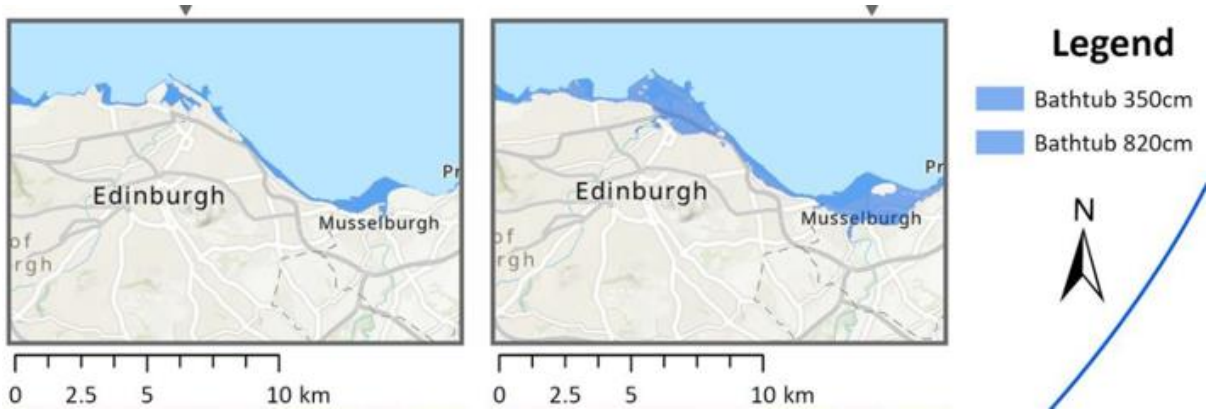


Figure 08/09.9: Future coastal flooding risks: bathtub scenario mapping (350 cm and 820 cm) (source: CRSES Coastal Risk Assessment - Southeast Scotland, Final Report 11/04/2025)

Under the lesser scenario of 3.5m sea level rise, there would still be a significant level impact, with all coastal areas affected to some degree; including Seafield, Portobello, Leith docks and Granton harbour. This would affect multiple human and natural receptors including conservation areas, quiet routes and local biodiversity sites, along with many individual properties, including residential, businesses and civic buildings.

Under the 8.m scenario the impact would be more significant. Flooding would subsume the entirety of the docks and harbour areas as well as significant parts of Leith and Portobello. This would impact an even greater number of properties as well as the modelled receptors. For example, 13 local biodiversity sites, 306 shops, 4 tram stops and 2381m of tramline would be affected.

It should be noted that this scenario planning is over a long time frame and carries a greater degree of uncertainty. As a result, it is not proposed to use this evidence in the same manner as 1:200 year flood risk with climate change for example, however it is still presented here as a consideration as a lens through which to consider longer term land use planning.

The CRSES Assessment also contains analysis of how a range of assets types may be affected by coastal erosion over different time periods under a 95th percentile scenario for climate change. The use of a 95th percentile scenario is in line with the precautionary principle adopted in relation to flood risk as used in NPF4.

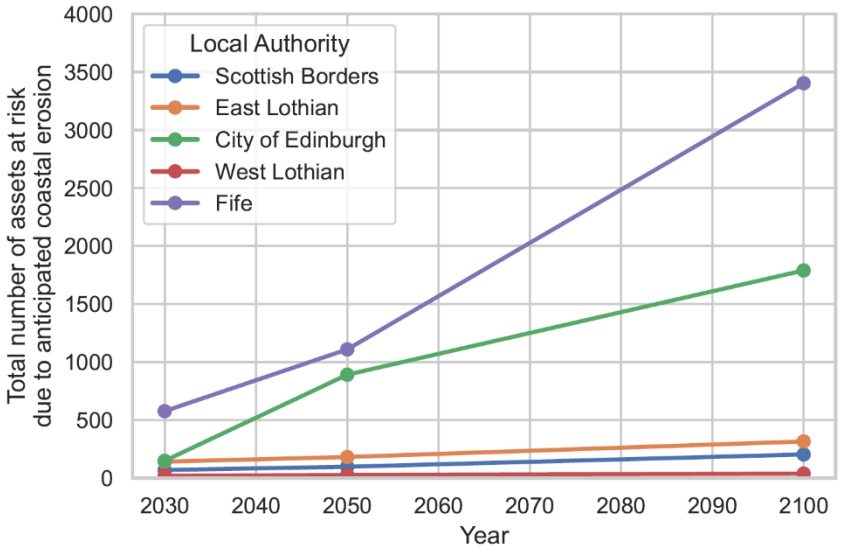


Figure 08/09.10: total number of assets at risk of erosion over time from coastal erosion for Council areas along the Forth estuary. (source: CRSES Coastal Risk Assessment - Southeast Scotland, Final Report 11/04/2025)

The figure illustrates the significant rise to assets from coastal erosion for Edinburgh. Edinburgh's high number of assets that are at risk is notable considering its coastline is much smaller than other authorities, however this reflects that the City has a much greater proportion of developed coastline. This highlights the particular risk that coastal change and erosion poses to Edinburgh.

Coastal change issues (including coastal flood risk) and the options for response along different sections of the coast will be contained in the Council's Coastal Change Adaptation Plan (CCAP). Work on this is underway and is being undertaken in accordance with Coastal Change Adaptation Plan Guidance. Draft outputs from the first stage of the CCAP are expected to be published by the end of 2026 and so will be able to taken into account in the preparation of the Proposed Plan.

Wind and storms

MET Office climate research: UK and Global extreme events – Wind storms notes that 'most climate projections indicate that winter windstorms will increase slightly in number and intensity over the UK i.e. more winter storms, including disproportionately more severe storms, are projected to cross the UK.' The MET Office caveats this by noting that this projection only has 'medium confidence' since not all climate models make this same projection.

Although this caveat is noted, the Council agrees with the view of ClimateXchange in its 2023 paper: 'Current and Future Windstorms in Scotland' which states that – even

with this level of uncertainty – the risk should still be considered given the adverse consequence of increased likelihood of severe storms.

For Edinburgh, there are a range of risks and consequences that would come from increased frequency and severity of storm events. Firstly, there are direct risks to health, life and damage to buildings, infrastructure and trees. Storms can also have a compounding effect on other risks like coastal flooding through storm surge and exacerbating wave overtopping. These represent particular risks for Edinburgh given the extent and proportion of its developed coastline as noted in section above. The city also has a significant level of taller older building stock which needs to be monitored for their state of repair and resilience to storms, given the high volumes of people close to buildings and risk such as falling masonry and slates.

Temperature

The Council area has a comparatively high proportion of urban area. This means the issue of temperature regulation and the urban heat island effect are particular risks, especially during hotter summer months as noted in figure 8/9-1 setting out the main climate risks facing Edinburgh.

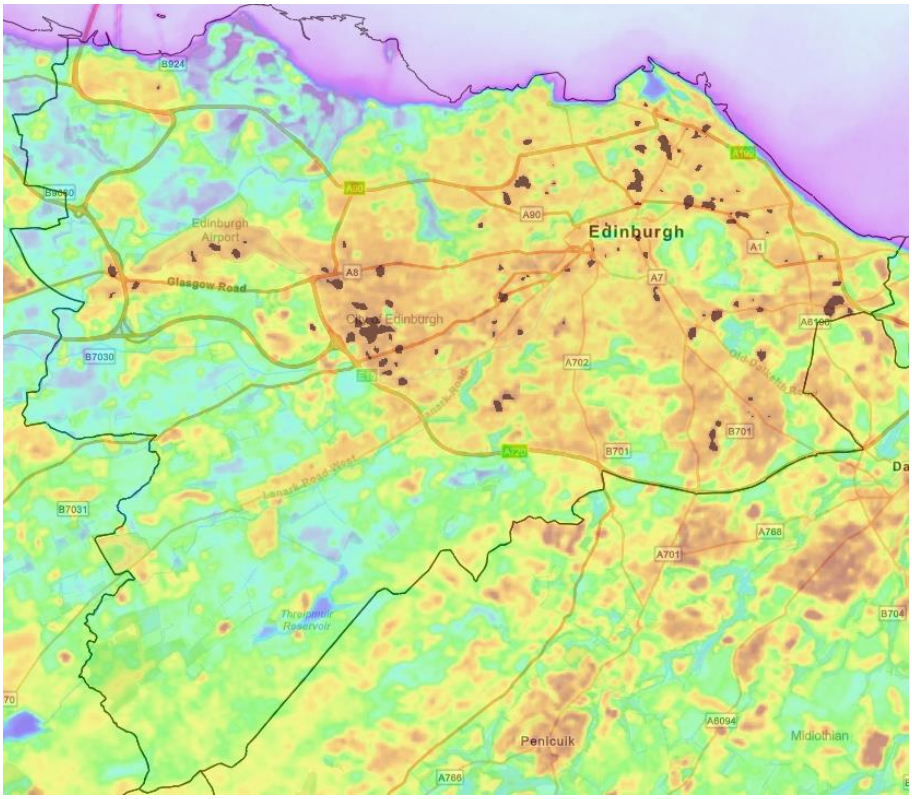


Figure 08/09.12: The risk of heating in Edinburgh area (source: Climate Action Map; note: areas at highest risk of heating in dark brown and sliding colour spectrum outside of these hottest areas)

Map 8/9.12 above shows an elevated level of risk for most urban areas in the Council area. Generally, the pattern is for denser areas to be hotter as expected but there are also other parts of the city away from the centre with the highest level of

risk. For example, the west of the city is comparatively high for heat risk, especially at Bankhead and the Gyle. It is noted that these areas have particularly low levels of greening which is recognised as exacerbating the heat island effect.

The heat risk map indicates that some of the areas of greatest heat risk overlap with the highest level of deprivation when compared to the Scottish Index of Multiple Deprivation; for example, Wester Hailes, Gracemount and Greendykes. Poorer communities may be those least able to adapt to the increases in temperature and the adverse effect of this in terms of the as they may be least able to afford either mechanical, passive or have sufficient access to nature based cooling solutions.

The effect of increases in temperature can also exacerbate the detrimental effects of air pollution, both directly and indirectly. For example, windows may have to be opened for ventilation during hot weather and cause increased exposure to air pollution from busy streets.

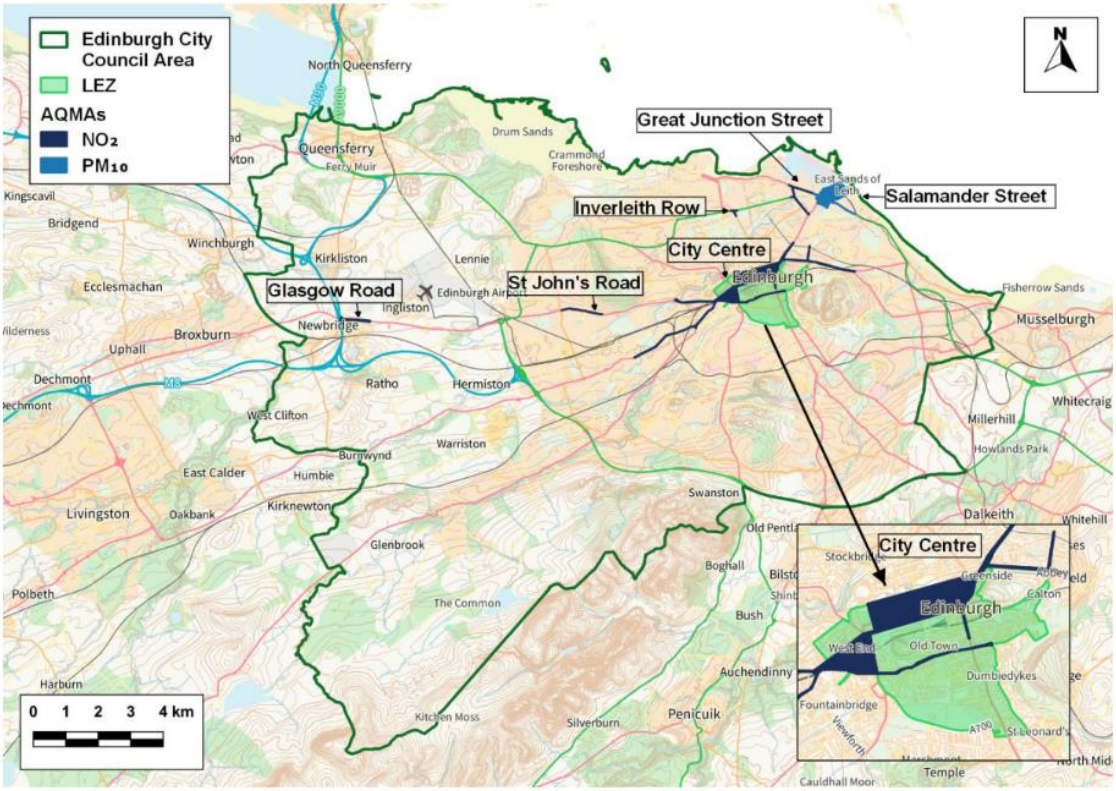


Figure 08/09.13: Edinburgh's Air Quality Management Areas and Low Emission Zone (source: The City of Edinburgh Air Quality Management Plan)

Figure 08/09.13 shows areas with the greatest levels of poor air quality in terms of Nitrogen Dioxide and PM10 levels are the centre of Edinburgh and Leith. These areas also contain hotspots for being most at risk from the urban heat island effect. As a result, there is potential for the effects of climate change to worsen outcomes in relation to air quality.

Drought

Water Scarcity in Scotland: A Knowledge Review (2023) - Climate Crisis: informing Scotland's actionable mitigation and adaptation response to water scarcity explains that higher temperatures occurring from climate change will also contribute to water scarcity.

Topic 01e Infrastructure - water and waste water addresses issues related to water scarcity in relation to mains water supply through the Scottish Water network. This section considers water scarcity outside of the Scottish Water network.

Water scarcity can have adverse impacts on areas outside of the Scottish Water network. This includes farms, with increased risk of fires, negative impacts on biodiversity and soil quality/susceptibility to flash floods (SEPA Planning Advice Note for Planning Authorities – LDP Evidence Gathering: Water Scarcity).

SEPA's website also has a drought risk assessment tool which provides an up-to-date source of information that provides a current snapshot of scarcity.

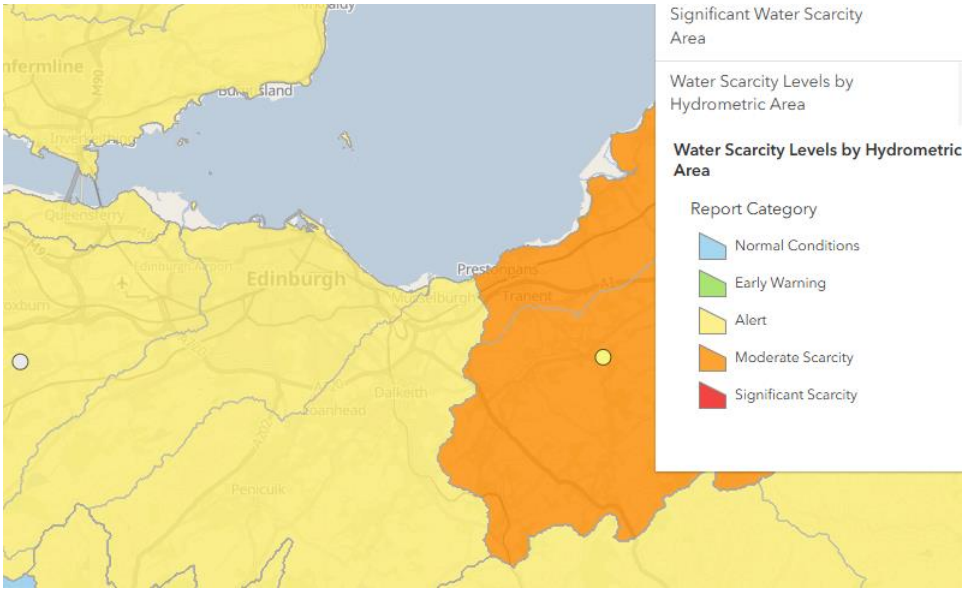


Figure 08/09.14: Example drought risk assessment information for the Edinburgh and surrounding area taken on the 25 September 2025

The image above is just one snapshot in time but shows a yellow alert level for the hydrometric areas relating to Edinburgh. The same website also provides access to previous weeks' information and reports to give context over a longer period.

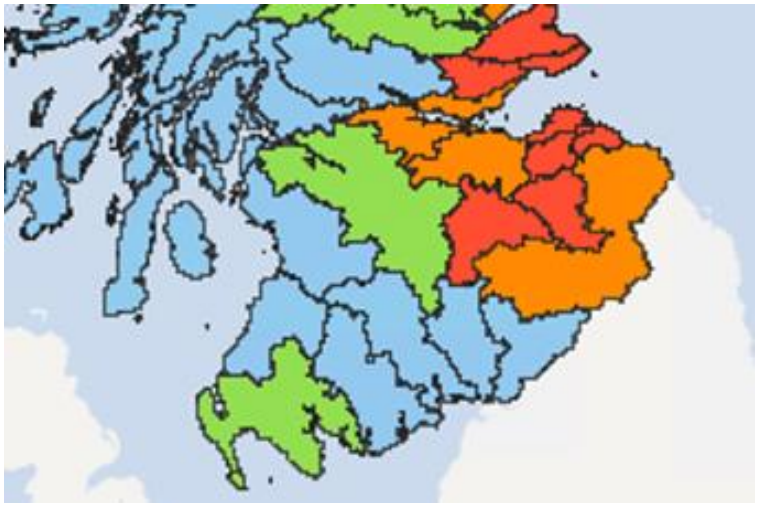


Figure 08/09.15: Map taken from SEPA water scarcity report for week commencing 11 September 2025

The image above shows how quickly water scarcity levels of alert can change as this image was only two weeks prior to Map 8/9.14. This highlights the importance of reviewing long term observed trends and predictions.

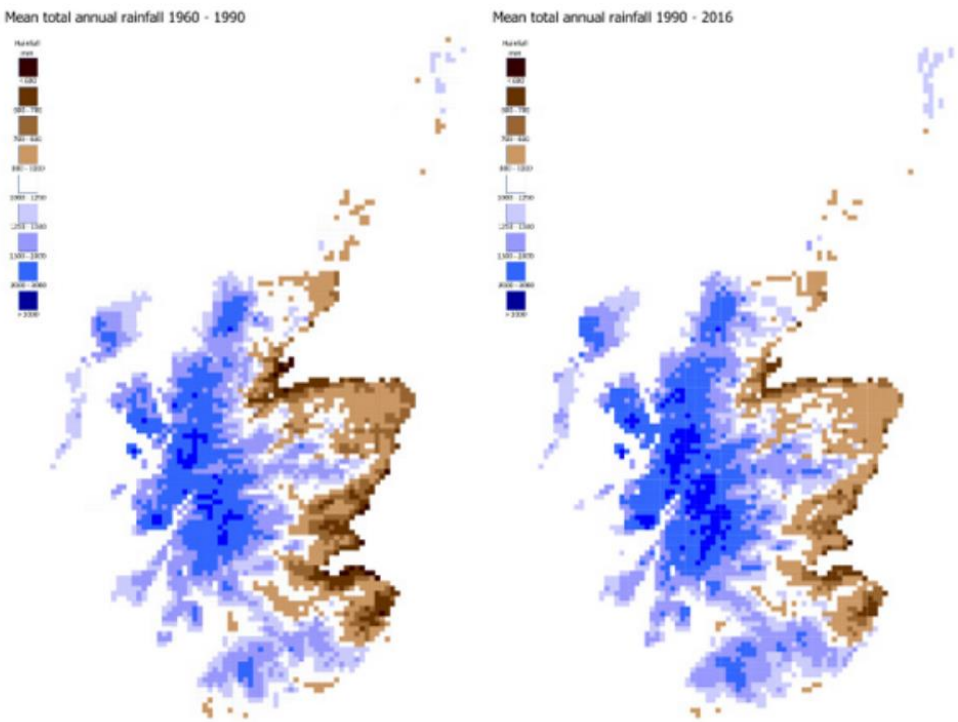


Figure 08/09.16: Observed change in mean total annual precipitation between 1960-1990 (left) and 1990-2010 (right) (source: the Centre of Expertise for Waters (CREW) publication Water Supplies and Climate Change)

As can be seen above, the longer-term pattern of change is that the Edinburgh area and the east coast of Scotland have been experiencing significantly drier annual weather. As set out below, this trend is expected to continue.

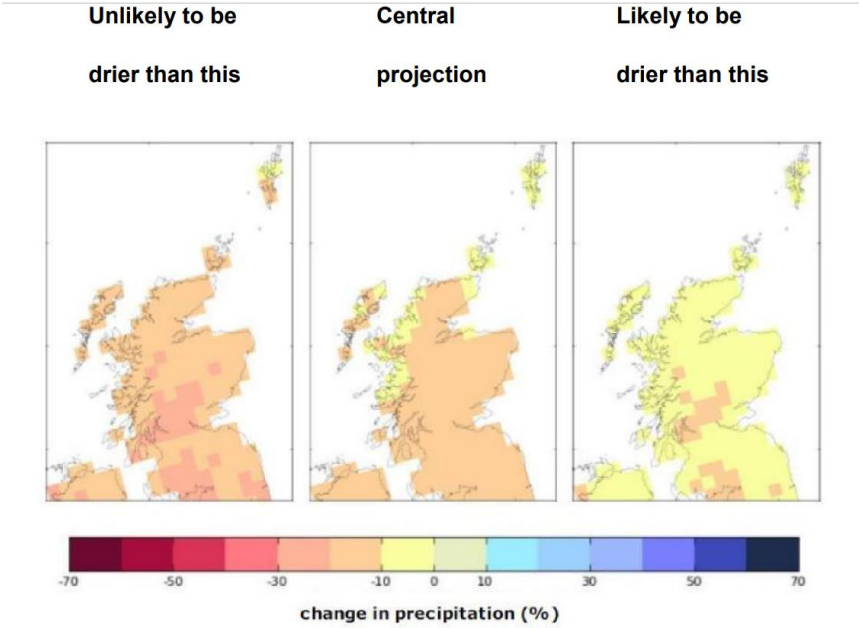


Figure 08/09.17: Projected change in summer precipitation by the 2050s showing the probability of drier summers under three scenarios (source: Scotland's National Water Scarcity Plan)

There are a range of more specific forecasts of drought impact, including on specific sectors. For example, the James Hutton Institute: Summary of the Climate Trends, Future Projections and Extremes in Scotland (2023); CREW: A review of the risks to water resources in Scotland in response to climate change; SEPA Water Classification Hub and Future Predictions of Water Scarcity in Scotland: Impacts to Distilleries and Agricultural Abstractors (Scotland's Centre of Expertise for Waters). One particular example is shown below in relation to the arable farming sector to illustrate the impact of the issue in a more specific context.

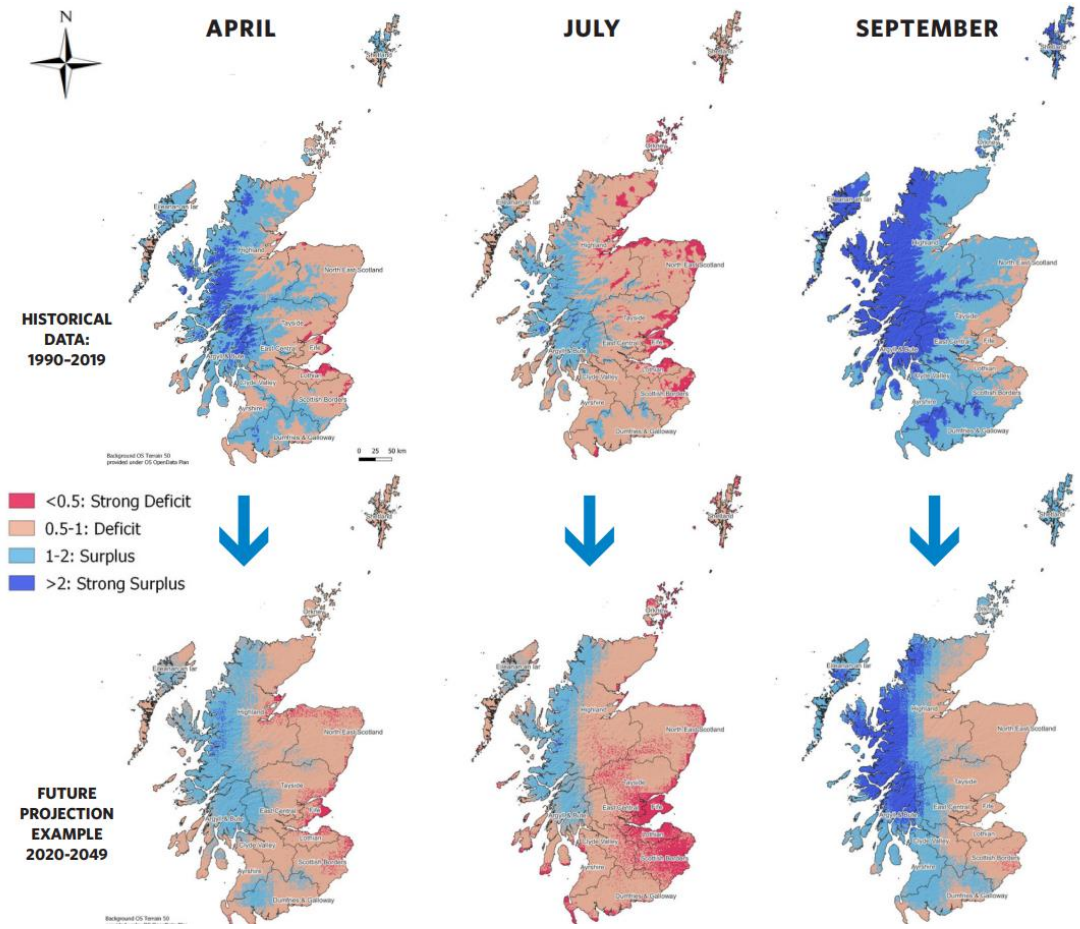


Figure 08/09.18: Future projections of the impact of water scarcity on the arable sector (source: Future Predictions of Water Scarcity in Scotland: Impacts to Distilleries and Agricultural Abstractors (Scotland's Centre of Expertise for Waters)

In line with overall projections for water scarcity, the arable farming sector is expected to be adversely impacted in the area around Edinburgh in the hottest mid-summer period.

Summary of implications for the Proposed Plan

The Proposed Plan will have a significant role in reducing greenhouse gases being emitted across a range of areas. Some of the main ways the plan could contribute to reducing emissions are in relation to transport, renewable energy, heating buildings, protecting existing stores of carbon and identifying new opportunities to capture emissions. The plan will also play an important role in making Edinburgh more resilient to climate change. Key climate risks include flood risk, coastal change, wind and storms, temperature and drought.

This must be considered in the context of a Just Transition so that it takes place in a way that benefits everyone. Consideration of social deprivation should be a key factor in this process. Protection of habitats and biodiversity are sensitive receptors which shall be considered in preparation of the plan as noted in Topic 5 Biodiversity.

Heating buildings

The Proposed Plan may help the delivery of heat networks that can assist to decarbonise both new and existing buildings. Topic 07 Zero waste, energy, heating and cooling has further information on this.

Transport emissions

The preparation the plan shall consider how it can support the measures set out further in Topic 01a Infrastructure – transport to reduce transport emissions.

The site appraisal methodology and spatial strategy of the proposed plan will seek to locate development in sustainable locations with access to public transport and local amenities by walking, wheeling and cycling.

A Transport Appraisal will inform the Proposed Plan.

Renewable energy

The Proposed Plan can consider both sensitivity and opportunities for renewable energy and battery storage using the Landscape Sensitivity Assessment Renewable Energy Development, amongst other factors. Topic 07 Zero waste, energy, heating and cooling has further information on this.

Summary of stakeholder engagement

Key Agency	**SEPA**
Main views raised	• **Draft Topic Papers (Nov 2025):** All relevant evidence sources should be referred to, although it is accepted that not all information has to be in this paper itself as long as it is appropriately cross refenced. In this regard, the linkages between topic papers should be clearer and more consistent. • **Final Topic Papers (March 2026):** Statement of agreement for this topic paper has been provided.
Council response and implications for the proposed plan	In response to comments made at the draft topic stage, clearer and more consistent linkages across various topic papers have been made.
Is the agency content with the evidence?	SEPA have advised: ‘We are satisfied with the revisions made to the Evidence Report and are pleased to offer a statement of agreement covering our key environmental

	interests below: Climate change; Nature networks; Blue Green Infrastructure; Water Management.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with SEPA in the preparation of the Proposed Plan, including the site appraisal stage of the process which will consider matters such as constraint posed by flood risk

Key Agency	**Scottish Forestry**
Main views raised	• **Draft Topic Papers (Nov 2025):** Welcomes the recognition of limited existing cover and potential to create new woodland planting using soils forestry capability mapping and a strong tree protection policy. This includes supporting potential forest capability (F2 – very good flexibility) in land west/north-west of Edinburgh but acknowledges other considerations e.g. agriculture.
Council response and implications for the proposed plan	These comments are noted and can inform the proposed plan.
Is the agency content with the evidence?	Scottish Forestry does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Consider policies and proposals relating to tree protection and woodland planting.

Key Agency	**Scottish Water**
Main views raised	**Draft Topic Papers (Nov 2025):** Include reference to Scottish Government National Flood Resilience Strategy in national context section.

	The topic paper could be more comprehensive, It only discusses vulnerability to flooding generically without much detail but other relevant topics e.g. consideration of climate change in SFRA modelling/mapping, opportunities for flood mitigations to deliver multiple benefits for climate adaptation (e.g. through blue green infrastructure), etc, are not included. Consider adaptation in relation to issue of wind/storminess **Final Topic Papers (March 2026):** The section on carbon stores addresses soils, trees and woodland. It then references the Scottish Carbon Capture and Storage (SCCS) website which relates to geological storage of carbon dioxide and has no relevance to soils, trees or woodland, stating that there are no projects planned for Edinburgh.
Council response and implications for the proposed plan	Additions have been made to address the gaps noted above, including wind/storminess and multiple benefits of blue green infrastructure. The structure and titles of sub-sections in this paper has been adjusted, including the creation of sub-section on new opportunities for new carbon capture which more naturally accommodates the reference to SCCS. The topic papers have been amended so that flood risk, including the effects of climate change, are addressed primarily in topic paper 04: water management, flood risk and coastal development. This allows consideration of the range climate change impacts on the water environment to be addressed comprehensively in the same paper. Consideration of the way in which blue green infrastructure can serve multiple benefits, including for water management and climate resilience, is addressed in topic paper 6: blue green infrastructure, open space and recreation.
Is the agency content with the evidence?	Scottish Water does not dispute any of the evidence set out in the topic paper. They have advised: ‘We are in general agreement of the matters relating to our organisation within these topic papers.’
Areas of agreement	Topic paper sufficient.

Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will consider the wider range of issues and evidence highlighted by Scottish Water when preparing the Proposed Plan. In particular, the importance of considering multiple benefits of blue green infrastructure and a wider range of climate risks will be recognised and responded to where appropriate.

Key Agency	**NatureScot**
Main views raised	• **Final Topic Papers (March 2026):** It would be useful to see a more direct link between climate change and the associated effects on biodiversity. This could be listed in a specific section in the Climate Adaptation and Mitigation paper or cross-referenced if listed in the Biodiversity topic paper. Issues such as increased temperatures, changing rainfall patterns, coastal changes, invasive species and their impacts on habitat fragmentation and species displacement should be evidenced. Biodiversity and habitat protection should also be considered in implications for the proposed plan under temperature, flooding and drought.
Council response and implications for the proposed plan	Evidence relating to climate change impact on biodiversity and habitat is being addressed in Topic 5 Biodiversity. A cross reference has been added to this paper.
Is the agency content with the evidence?	NatureScot does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will consider the effects of climate change on biodiversity and habitat protection, including in relation to issues of temperature, flooding and drought. The role of nature-based solutions as a form of nature positive

	adaptation measure to increase climate resilience will also be an important consideration in the preparation of the plan.

Key Agency	**NHS Lothian**
Main views raised	• **Draft Topic Papers (Nov 2025):** The NHS has commented noting the need to address the Just Transition as part of mitigation and adaptation.
Council response and implications for the proposed plan	Achieving a Just Transition (and the risk of respiratory illness (as part of the issue of thermal insultation/heating), have been explicitly noted as issues which will be considered in the preparation of the plan.
Is the agency content with the evidence?	NHS consider the topic paper is sufficient in respect to NPF4 Policy 26 and has no issues of dispute.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	As noted above, achieving a just transition and the risk of respiratory illness will be considered.
Key Agency	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** Comments are made about the positive steps housebuilders are already taking to assist with climate mitigation and adaptation such as incorporating green blue infrastructure. HFS does not dispute the evidence set out in this paper however a number of evidence sources are suggested. New homes will contribute to a just transition where the new homes are cheaper to run, and the technology used is likely to be retrofitted in existing homes in the future. Section 3F into the Town and Country Planning (Scotland) Act 1997 is now repealed and means there no requirement to include policies within development plans under Section 3F is therefore no longer necessary. The legislation relating to this is suggested as an evidence source.

	It would be unreasonable to require a development to be designed and constructed to connect to a potential future heat network at a later date. The extent of any safeguard within the adopted road network, private garden ground and homes would be unknown whilst the cost associated with retrofitting a solution is likely to be prohibitive. There is also no guarantee that homeowners will be willing to convert from an existing energy provider to an ESCo. Influencing travel patterns is key to reducing emissions but mitigation should be proportionate to ensure that any potential developer contributions meet the tests set out in National Planning Framework 4 Policy 18.
Council response and implications for the proposed plan	Many of the suggested additional evidence sources do not directly relate to the topic paper. New homes contributing to a Just Transition is noted. The comments about Section 3F into the Town and Country Planning (Scotland) Act 1997 now being repealed and the suggestion that the legislation relating to this as an evidence source are not sources of evidence themselves, nor do they have relevance to any evidence considered at this Evidence Report stage. Comments in relation to heat networks are noted as a consideration for the Proposed Plan. Sustainability will be a consideration in the suitability of sites. The marketability of sites is not an equivalent consideration however. The comment about the need for contributions to be proportionate is noted.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Not applicable.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Noted comments on Just Transition and heat networks in relation to the Proposed Plan.

Other engagement and matters raised

Draft Topic Papers (Nov 2025):

A partnership response from University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast set out information and recommendations were provided relating to coastal change and adaptation, particularly drawing upon the Climate Ready South East Edinburgh Coastal Risk Assessment – Southeast Scotland. This included observed and projected extent coastal erosion under different scenarios, and information on coastal flood risk and sea level rise. The information submitted has primarily been incorporated into Topic 04 Flood risk, water management and coastal change.

Final Topic Papers (March 2026):

An updated Evidence Report consultation response from University of Glasgow, Climate Ready South East Scotland (CRSES) / Dynamic Coast was provided on 31 March 2026 which expanded upon and clarified certain points of information referred to the previous consultation response.

Existing carbon stores: soils, trees and woodland

The Proposed Plan should seek to avoid development in areas with greatest organic carbon concentration, particularly the Pentland Hills and its areas of peatland.

The Proposed Plan can consider the best use of land through denser development and reuse of brownfield land which will also support climate adaptation and mitigation through encouraging walkable neighbourhoods, public transport services and heat networks as outlined in Topic 15 Local living and Topic 07 Zero waste, energy, heating and cooling.

Consideration of how best to protect Edinburgh's finite amount of tree coverage will be necessary, recognising the carbon sequestration value of trees, alongside other climate, nature and wellbeing advantages.

Opportunities for new carbon storage

Opportunities to identify areas suitable for new woodland and proposals for this should be considered in the Proposed Plan, including consideration of the Forestry and Woodland Strategy.

The Scottish Carbon Capture and Storage website currently shows no carbon capture and storage projects in Edinburgh. This shall be monitored however, with consideration will be given to any emerging proposals.

Vulnerability to Flooding

The place-based approach in the Proposed Plan can consider the local benefits of nature-based solutions to flood risk resilience and to recognise the associated benefits such as improvements to mental and physical health.

Responding to coastal change

The Proposed Plan shall be informed by the emerging Coastal Change Adaptation Plan (CCAP) as well as information from Dynamic Coast 2 and Climate Ready South East Scotland (CRSES). Both the plan and CCAP will consider the social, environmental and biodiversity impact of coastal change, including different levels of vulnerability. This will be informed by the Integrated Impact Assessments that are being undertaken for these documents.

The Proposed Plan will take account of coastal change, including through the spatial strategy, existing vulnerable infrastructure, new infrastructure. Tools such as site appraisal and flood risk appraisal will inform this.

Wind and storms

Evidence reinforces the importance of adopting the precautionary principle in relation to coastal flood risk given the potential for increased frequency of extreme storm events to exacerbate coastal flood risk.

Temperature

Heat island evidence can help the Proposed Plan identify areas where green blue infrastructure proposals would most assist to reduce the heat island effect of climate change. It will be important to review SIMD mapping when considering the location and nature of adaptation measures such as green blue infrastructure given the correlation of social deprivation and vulnerability to the urban heat island effect.

Air quality mapping will also be important to consider in the context of increasing urban heating given the compounding effect of the urban heat island effect on air quality.

Green blue infrastructure will also be important in providing cooling and shade for heat regulation. The place-based approach to the Proposed Plan will look for opportunities for green blue infrastructure to be added or improved.

Evidence in relation to risk of damp, mould and respiratory illness from buildings with poor insultation and ventilation will be considered to see if this identifies any measures appropriate to include in the Proposed Plan that could reduce risk.

Drought

The Proposed Plan will need to carefully consider instances where proposals may result in a significant increase in private abstractions given the potential to impact on water as a key resource, including for critical sectors such as food production.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

10: Historic assets and places

Topic	**10: Historic assets and places**
Description of topic	Assessment of Edinburgh's historic environment and information on existing designations.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019 (The Act):** The Evidence Report requires that the planning authority set out its view on the principal cultural and built heritage characteristics of the area (section 15(5)(a)). **Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997:** • **Section 61(1) - Designation of conservation areas:** Every planning authority shall - i.) from time to time determine which parts of their district are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and ii.) designate such areas as conservation areas. • **Section 63(1) - Proposals for preservation and enhancement of conservation areas:** It shall be the duty of a planning authority to formulate and publish, from time to time, proposals for the preservation and enhancement of any parts of their district which are conservation areas. • **Section 64(1) - General duty as respects conservation areas in exercise of planning functions:** In the exercise, with respect to any buildings or other land in a conservation area, of any powers under the Act, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. **Ancient Monuments & Archaeological Areas Act 1979:** This is the legislation under which Historic Environment Scotland undertakes the scheduling of nationally important monuments. The aim is to preserve Scotland's most significant sites and monuments for the future, including structures, archaeology, and gardens and designed landscapes.
Relevant NPF4 Policies	• Policy 1 Tackling the climate and nature crises • Policy 2 Climate mitigation and adaptation • Policy 7 Historic assets and places • Policy 9 Brownfield, vacant and derelict land and empty buildings

	• Policy 11 Energy • Policy 14 Design, quality and place • Policy 30 Tourism
Local Development Plan Guidance	LDPs, including through their spatial strategies, should support the sustainable management of the historic environment. They should identify, protect, and enhance valued historic assets and places. Local Development Planning Guidance: Sets out the following information likely required in taking account of NPF4 policy: • Locations of international and national designations including scheduled monuments; category A listed buildings; inventory gardens and designed landscapes; and World Heritage Sites. • Locations of regional and local designations including category B and C listed buildings; conservation areas, locally important gardens and designed landscapes; archaeological sites; and buildings and other historic assets of particular significance to communities identified in Local Place Plans (LPPs). The LDP Guidance identifies the following other information that the Council, as planning authority, may wish to prepare or review for spatial implications: • world heritage site management plans • historic environment strategies • conservation area character appraisals • conservation area management plans • conservation area regeneration schemes • townscape heritage initiatives • townscape protection appraisals • buildings at risk strategies • local landscape character / sensitivity assessments • place standard assessments • town centre audits and action plans. The LDP Guidance notes that 'local place plans may provide information about heritage assets valued by community groups. Engagement using the Place Standard Tool may also generate information about locally valued heritage. Planning authorities may take the opportunity to

	consider in consultation with Historic Environment Scotland where designation records could be amended or updated.'
Linked Topic Papers	• Topic 1g Infrastructure - cemeteries, crematoriums and mortuaries • Topic 07 Zero waste, energy, heating and cooling • Topic 08 and 09 Climate change and mitigation • Topic 11 Design, quality and placemaking • Topic 15 Local living • Topic 20 Tourism, culture and creativity
List of and links to evidence	• **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023 • **CD033** City Plan 2030 Written Statement, City of Edinburgh Council, November 2024 • **CD290** Edinburgh Heritage Strategy, City of Edinburgh Council, February 2010 • **CD067** Non Statutory Guidance - Listed Building and Conservation Areas non-statutory guidance, City of Edinburgh Council, September 2025 • **CD066** Non Statutory Guidance - Edinburgh Design Guidance, City of Edinburgh Council, September 2025 • **CD070** Non Statutory Guidance - Guidance for Householders, City of Edinburgh council, September 2025 • **CD513** Old and New Towns of Edinburgh World Heritage Nomination for World Heritage Status, Historic Environment Scotland (HES) (Historic Scotland), September 1994 • **CD512** Old and New Towns of Edinburgh World Heritage Site: Statement of Outstanding Universal Value, Historic Environment Scotland (HES), March 2016 • **CD393** The Old and New Towns of Edinburgh World Heritage Site Management Plan 2024-2035, City of Edinburgh Council, Historic Environment Scotland & Edinburgh World Heritage, 2024 • **CD463** Forth Bridge Nomination for Inclusion in World Heritage List: Management Plan 2014-2019, Forth Bridges Forum, 2014 • **CD464** The Forth Bridge World Heritage Site: Key Viewpoints, Forth Bridges Forum, October 2016 • **CD462** Draft Forth Bridge World Heritage Site Management Plan 2025-2035 Forth Bridges Forum, 2025 • **CD272** Consultation Draft Princes Street and Waverley Valley Strategy, City of Edinburgh Council, September 2024

- **CD068** Non Statutory Guidance - Guidance for Businesses, City of Edinburgh Council, January 2024
- **CD269** Conservation Area Character Appraisals, City of Edinburgh Council
- **CD270** Conservation Area Management Plans, City of Edinburgh Council
- **CD271** Edinburgh's Conservation thematic studies, City of Edinburgh Council
- **CD111** Planning Advice Note (PAN) 71: Conservation Area Management, Part 1 *(withdrawn December 2025 but remains a source of information),* Scottish Executive (development Department), December 2004
- **CD112** Planning Advice Note (PAN) 71: Conservation Area Management, Part 2 *(withdrawn December 2025 but remains a source of information),* Scottish Executive (development Department), December 2004
- **CD498** Historic Environment Policy for Scotland (HEPS), Historic Environment Scotland, April 2019
- **CD501** Our Past, Our Future, Historic Environment Scotland, April 2023
- **CD505** Research Strategy 2023-28, Historic Environment Scotland, March 2023
- **CD497** Designation Policy and Selection Guidance, Historic Environment Scotland, December 2020
- **CD500** Managing Change in the Historic Environment Guidance Notes, Historic Environment Scotland
- **CD508** Talking About Heritage Guidance, Historic Environment Scotland, September 2022
- **CD499** Historic Environment Scotland Circular, Historic Environment Scotland, April 2019
- **CD503** Pointing the Way to the Future, Historic Environment Scotland, July 2023
- **CD495** A Guide to Climate Change Impacts, Historic environment Scotland, October 2019
- **CD176** Planning Advice Note 2/2011: Planning and Archaeology *(withdrawn December 2025 but remains a source of information),* Scottish Government, July 2011
- **CD123** Circular 1/2024: Householder Permitted Development Rights, Scottish Government, May 2024
- **CD209** Scottish House Condition Survey: 2023 Key Findings, Scottish Government, January 2025
- **CD667** Planning Conservation Advice Note 11: Development in the setting of historic designed landscapes, The Garden History Society (not The Gardens Trust), 2005

- **CD083** 2030 Climate Strategy, City of Edinburgh Council, December 2021
- **CD265** Climate Ready Edinburgh Plan 2024-2030, City of Edinburgh Council, August 2024
- **CD454** Edinburgh 2030 Strategy - Draft for consultation, Edinburgh Tourism Strategy Implementation Group, November 2019
- **CD232** Scottish Index of Multiple Deprivation (SIMD), Scottish Government & Ordnance Survey, 2020
- **CD509** The Links between Scotland's Historic Environment and Wellbeing, Historic Environment Scotland, August 2020
- **CD418** Report of the General Trustees, Church of Scotland, May 2022
- **CD504** Portal, Historic Environment Scotland
- **CD510** Trove.scot, Historic Environment Scotland
- **CD149** Historic Environment Records - Scotland, Scottish Government, April 2026
- **CD507** Scotland's Historic Environment Audit 2016, Historic Environment Scotland, April 2020
- **CD502** Pastmap, Historic Environment Scotland
- **CD511** Your Historic Place Lens, Historic Environment Scotland
- **CD410** Sustainable Investment Tool, Built Environment Forum Scotland & Historic Environment Scotland
- **CD553** National Library of Scotland Maps, National Library of Scotland
- **CD496** Buildings at Risk Register (BARR), Historic Environment Scotland
- **CD325** Listed building and conservation area interactive map, City of Edinburgh Council
- **CD217** Scottish Vacant and Derelict Land Survey - Site Registe, Scottish Government, September 2025
- **CD257** Cemetery Strategy, City of Edinburgh Council, November 2021
- **CD615** Flood maps, SEPA

List of matters covered

This topic paper sets out the evidence in relation to the city's built heritage. It provides a summary of the existing key data and evidence and outlines the planning authority's consideration of this evidence and covers:

- Strategic and Policy Context
- Designations
- Sustaining Heritage Assets and Places

Summary of evidence

Strategic and Policy Context

Our Past, Our Future – The Strategy for Scotland's Historic Environment

This is Scotland's national 5-year strategy for the historic environment for the period 2023-2028. The strategy recognises the historic environment as a national asset that contributes significantly to the economy, tourism and jobs. The strategy sets the direction of travel for the historic environment sector and identifies three priority areas of action:

- Delivering the transition to net-zero (including recognition of the contribution that the maintenance, reuse and adaptation of historic buildings can make in preventing waste and reducing carbon emissions)
- Empowering resilient and inclusive communities and places
- Building a wellbeing economy.

National

National Planning Framework 4 (NPF4)

NPF4 places a strong emphasis on tackling the climate emergency with the drive to net-zero. Policies 1 and 2 and 11 give support to this as a priority. The reuse of redundant buildings and redevelopment of brownfield sites within the historic environment can help to contribute positively to these policies and the Proposed Plan will explore this approach.

NPF4 seeks to achieve three main outcomes:

- Sustainable places
- Liveable places
- Productive places.

The historic environment of the council area has a key role to play in achieving all of these outcomes. Listed buildings and historic buildings such as found in conservation area represent the ongoing sustained use of buildings for many decades. Most have been constructed from quality, natural, and locally sourced materials and many continue in the use for which they were originally designed and constructed, while others have been successfully adapted and reused to suit new requirements/uses over time.

The historic environment is fundamental to sustaining our places, making them attractive and interesting. Edinburgh's two World Heritage Sites, conservation areas, listed buildings, scheduled monuments, designed landscapes and archaeological site are special and unique and require to be valued and cared for so that all can continue to benefit from and enjoy them and so that they can continue to support tourism and the local economy. Many conservation areas are where people live, work, study and engage in activity for enjoyment - they are liveable and productive

places, and in many respects, they already meet many of the needs identified in NPF4 and the principles of good placemaking.

The intent of NPF4 Policy 7 Historic assets and places is to protect and enhance the historic environment and to enable positive change as a catalyst for regeneration. There are 15 component parts to Policy 7 (a-o) providing policy protection of the main assets within the historic environment. This includes, but is not limited to, specific policy provisions relating to the demolition of listed buildings (criterion b) and the demolition of buildings in conservation areas (criterion f). Policy 7 also includes specific policy provisions relating to the reuse of 'at risk' buildings (criterion m) and another relating to 'enabling development' (criterion n), which are not covered in any of City Plan 2030 policies Env 9 - Env 17.

NPF4 Policy 9 encourages the reuse and redevelopment of vacant or underused sites and buildings, promoting sustainable regeneration and efficient reuse of land.

NPF4 Policy 14 relates to design, quality and place. Its policy intent is to encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

NPF4 Policy 30 supports tourism development while safeguarding cultural and environmental assets.

The Historic Environment Policy for Scotland, 2019 (HEPS)

Historic Environment Scotland's (HES) policy statement sets out the principles and policies for good decision making where decisions will affect the historic environment.

Managing Change in the Historic Environments - Guidance Notes

A series of national guidance notes published by HES covering a wide range of topics to assist decision-making relating to the historic environment. NPF4 refers to this guidance and it is a material consideration in planning decisions.

Pointing the Way to the Future

HES' climate and nature crisis statement recognises that the historic environment is part of a just transition to net-zero. It contributes to our places, communities and identities and the reuse of historic assets is central to sustainable development.

HES research priorities for 2023-2028 include investigating and researching to inform how it could improve its existing guidance, advice, and policies to account for the climate emergency.

Planning Advice Note (PAN) 71 – Conservation Area Management

This guidance document has been withdrawn in favour of NPF4. However, it remains a source of information on how to preserve and manage conservation areas.

Planning Advice Note (PAN) 2/2011 – Planning and Archaeology

This guidance document has been withdrawn in favour of NPF4. However, it remains a source of information on dealing with archaeological remains.

Local

City Plan 2030

The main policies relating to the historic environment are policies Env 9 - Env 17:

- Env 9 World Heritage Sites
- Env 10 Listed Buildings - Demolition
- Env 11 Listed Buildings - Setting
- Env 12 Listed Buildings and structures - Alterations and Extensions
- Env 13 Conservation Areas - Demolition of Buildings
- Env 14 Conservation Areas - Development
- Env 15 Historic Gardens and Designed Landscapes
- Env 16 Protection of Important Archaeological remains and the historic environment
- Env 17 Development of Sites of Archaeological Significance.

In addition, there are policies woven through the whole of the LDP which are a material consideration when assessing applications for development impacting on heritage, including but not limited to:

- Env 3 Development Design - Incorporating and Enhancing Existing and Potential Features
- Env 7 Sustainable Developments
- Env 30 Building Heights
- Env 38 Shopfronts.

The above listed City Plan 2030 policies and others seek to preserve and enhance varying types of heritage asset and/or type of development and the setting of its component features. The policies are similar in spirit and purpose to those within NPF4 Policy 7. Some of these City Plan 2030 policies go beyond the specific scope of NPF4 policies.

These are important policies that reflect the need to address specific and ongoing development pressures and trends within the council area. Consideration should be given to the way in which these policies/issues can be addressed effectively when preparing the Proposed Plan to ensure that the development pressures and characteristics of the historic environment are addressed.

Planning guidance (statutory and non-statutory) relating to the historic environment includes:

- Guidance for Listed Buildings and Conservation Areas, September 2025
- Edinburgh Design Guidance, including protected skyline views, September 2025
- Guidance for Householders, September 2025
- Guidance for Businesses, January 2024
- Relevant planning briefs, frameworks and masterplans
- Conservation Area Character Appraisals (for all 50 conservation areas)
- Conservation Area Management Plans (CMPs)
- The Old and New Towns of Edinburgh World Nomination for World Heritage Status
- The Old and New Towns of Edinburgh World Heritage Site Management Plan 2024-2035
- Forth Bridge Nomination for Inclusion in World Heritage List: Management Plan 2014-2019
- Forth Bridge key viewpoints document
- Forth Bridge Draft World Heritage Site Management Plan 2025-2035.

These guidance documents are designed to be an important planning tool to guide development management and to provide advice to applicants to help effectively manage change in respect of these heritage assets. The documents have been approved by the Council and are material considerations in the planning process, including the determination of applications.

In developing the Proposed Plan, it will be important to ensure that its spatial strategy and planning policies reflects best practices for managing the historic environment.

Designations

In this section, evidence is presented on the following designated heritage assets within Edinburgh:

- Listed buildings
- Conservation areas
- Inventory gardens and designed landscapes
- World heritage sites
- Scheduled monuments.

Background

Designations help in the identification and understanding of heritage assets. The information provided in a designation aids our understanding of their special character, value and significance, and in so doing supports their effective

management and protection. The need to ensure adequate protection of heritage assets is set out in NPF4 and in HES's 'Our Past Our Future Strategy.'

The Council maintains data on all designated heritage assets within the area. This includes the mapping of all listed buildings, conservation areas, inventory gardens and designed landscapes, World Heritage Sites and scheduled monuments. As of April 2026, there were 4,938 statutorily designated heritage assets in the council area.

Listed Buildings

HES is responsible for the statutory listing of buildings which have special architectural or historic interest. At present, there are 4,813 listed building entries for Edinburgh. Of UK cities, Edinburgh has the second highest number of listed buildings and has the highest concentration of listed building per square metre of any other city in the UK. These buildings reflect Edinburgh's unique history and built heritage. There are at present 895 category A, 2,603 category B and 1,314 category C listed buildings. The listed buildings can be found using the Council's online designations search or map search.

The first lists for Edinburgh were made statutory in the mid-1960s. The earliest listings date from 1964 and are largely found in the New Town. Three quarters of the wards and outlying parishes were resurveyed from 1993 to 2008. The format of the listed building records will vary in length and detail depending on the date of review. Earlier descriptions are brief and may not explain why the building is of interest for listing. Currently, HES provide a fuller description of the listed building, with photographs and indicative polygon maps for new and recently reviewed records. HES are not planning a systematic review of older listings in the city in the foreseeable future. The purpose of the list description is to identify the listed building and not what is covered by the listing.

Whilst a systematic review is not proposed by HES, Edinburgh's listed buildings do change overtime. Since May 2022, HES has designated 4 new listed buildings, amended 8 listings, removed 5 listings, assessed 3 listings as requiring no change or update, assessed 15 buildings as not meeting the criteria for listing and assessed 1 building as meeting the criteria for listing but not proceeding with designation at this time due to advanced development proposals. There are currently 7 open listing cases in Edinburgh. These cases are listed in the table below.

HES Ref number	**Site name & decision**
Designated	
300059572	Remnant of Gulliver Sculpture, Hunter's Hall Park, Niddrie Mains Road, Edinburgh (LB52616)

300053312	Tollcross Fire Station, including drill tower and boundary walls, gate piers and gates, 6 West Tollcross and Ponton Street, Tollcross, Edinburgh (LB52620)
300058005	Former bonded warehouse, including single storey outbuilding, cobbled yard and gate pier, and excluding interiors, 15 Duke Street, Leith, Edinburgh (LB52625)
300085485	Former Lads Institute 27-29 Ratcliffe Terrace
Amended	
300065965	20-42 (inclusive numbers) Heriot Row, and 2 Howe Street, 1-3 (odd numbers) India Street, including railings and lamps with 1, 7, 9, 11, 15, 21, 23, 31, 33, 37, 43, 45, 51 and 59 Jamaica Street South Lane (LB29026)
300065394	7, 8, 9, 10 Pier Place, Former St Andrew's Free Church and Halls, Edinburgh (LB43724)
300054179	4A-4H (consecutive numbers) Canon Street, Edinburgh (LB28421)
300054185	7A-7H (consecutive numbers) Canon Street, Edinburgh (LB28422)
300054186	8A-8H (consecutive numbers) Canon Street, Edinburgh (LB28423)
300065687	Former Filter House, Hillend Pump House and Entrance Gates and Boundary Wall, Fairmilehead Water Treatment Works, Buckstone Terrace, Edinburgh (LB45834)
300060448	Royal College of Surgeons of Edinburgh, Playfair Building (Surgeons' Hall), including Screen Wall, Gates, Railings and Lamp Standards, Nicolson Street, Edinburgh (LB27772)
300071329	19-36 (Inclusive Numbers) South Bridge, 29-57 (Odd Numbers) Niddry Street and 212 Cowgate, Edinburgh (LB29791)
Removed	
300061308	Glasgow Road, Castle Gogar Lodge and Gates and Gatepiers (LB27112) –listing removed 06/07/2023
300062782	Gogar Parish Church (Formerly C Of S) and Churchyard Glasgow Road (LB26984) –listing removed 20/03/2023
300067687	Bath Place 8-20 Portobello (LB28276) - listing removed 26/10/2023
300067687	Bath Place 8-20 Portobello (LB28276) - listing removed 26/10/2023
300068104	St Bernard's Davidson Church, Henderson Row (LB300016) -listing removed31/10/2023
300078673	Leith Docks, Imperial Dock Grain Elevator (LB27619) - listing removed 10/04/2025
Assessed (No Change or Update to Supplementary Information)	

300046234	Designation Proposal for St Andrew Square, Melville Monument with boundary walls and railings, Edinburgh
300064318	Designation Proposal for 14 Bath Street, The George, Formerly The County, Portobello, Edinburgh
300071599	Designation Proposal for Newbridge Village, Bridge Street, Newbridge Inn
Assessed (Does not meet criteria)	
300050290	North British Distillery buildings, Wheatfield Road, Gorgie, Edinburgh
300051102	Office block, former Blandfield Chemical Works, Wheatfield Road, Gorgie, Edinburgh
300065228	The Buckstone, Stables and Coach House, The Braid Hills Hotel, 134 Braid Road, Edinburgh
300069550	Designation Proposal for 50 Gillespie Crescent, Edinburgh
300072189	Housing (Scotland) Act 1919 estates, Edinburgh (various sites)
300056205	Designation Proposal for 62-68 (EVEN NOS) Camus Avenue, Comiston House
300073826	Garden room to rear, 29 Inverleith Gardens, Edinburgh (extension by Richard Murphy Architects)
300059498	Designation Proposal for Railings and two electricity boxes on Warrender Park Terrace.
300074629	Designation Proposal for Former Coach House, Spylaw Park, Edinburgh
300071879	Designation Proposal for Edinburgh Old Kirk and Hall, 37 Holyrood Road, Edinburgh
300070583	16, 18, Kirkliston Community Centre and Nursery, Queensferry Road, Kirkliston
300067867	North-East Studio Building, Edinburgh College of Art, Lauriston Place, Edinburgh
300057919	Designation Proposal for Memorial Hall (Church) Shore Road, Port Edgar, South Queensferry EH30 9SQ
300061927	Former railways shed, 12 West Harbour Road, Edinburgh
300062072	Police Box, Hope Park Crescent, Edinburgh
300063123	Designation Proposal for Mill Lade House, 13 Belford Place, Edinburgh
300063538	Leith Mural, 21 North Junction Street, Edinburgh
300073277	Designation Proposal for Former Granton Church, 227 Granton Road, Edinburgh
300047125	Robertson Avenue St Andrew's Works Front Block (Edinburgh, LB26755)

300059233	2/4 Littlejohn Road (plus nos. 1 and 5/3), Greenbank, Edinburgh
300062072	Police Box, Hope Park Crescent, Edinburgh
300063123	Designation Proposal for Mill Lade House, 13 Belford Place, Edinburgh
300063538	Leith Mural, 21 North Junction Street, Edinburgh
300070870	Designation Proposal for 3-41 (inclusive numbers) Gillespie Crescent, Edinburgh
300073277	Designation Proposal for Former Granton Church, 227 Granton Road, Edinburgh
300076807	Designation Proposal for The Manse Club, 62-68 Manse Road, Corstorphine, Edinburgh
300079027	Earl Haig Memorial Homes, Saughton Mains Street and Stenhouse Drive, Edinburgh
300070870	Designation Proposal for 3-41 (inclusive numbers) Gillespie Crescent, Edinburgh
300076807	Designation Proposal for The Manse Club, 62-68 Manse Road, Corstorphine, Edinburgh
Assessed (meets criteria for listing but HES not proceeding at this time with designation owing to advanced development proposals)	
300084126	Designation proposal Argyle House, 3 Lady Lawson Street
Open listing cases	
300047125	Robertson Avenue St Andrew's Works Front Block (Edinburgh, LB26755)
300059233	2/4 Littlejohn Road (plus nos. 1 and 5/3), Greenbank, Edinburgh
300062072	Police Box, Hope Park Crescent, Edinburgh
300063123	Designation Proposal for Mill Lade House, 13 Belford Place, Edinburgh
300063538	Leith Mural, 21 North Junction Street, Edinburgh
300073277	Designation Proposal for Former Granton Church, 227 Granton Road, Edinburgh
300079027	Earl Haig Memorial Homes, Saughton Mains Street and Stenhouse Drive, Edinburgh

Figure 10.1: Recently completed cases (last 4 years (May 2022 – April 2026)

It is important the Proposed Plan recognises the importance and value of the city's listed buildings and their setting.

Conservation Areas

Conservation areas are areas of special architectural interest the character and appearance of which it is desirable to preserve or enhance. Edinburgh currently has 50 designated conservation areas and each one has its own unique history, character and appearance. The variation illustrates the history and development of Edinburgh and they range from the New Town which is the largest conservation area

in Scotland to small villages which have been absorbed as the city expanded. Figure 10.2 below shows the extent of the city which is covered by conservation areas whilst the detailed maps can be viewed on City of Edinburgh Council Atlas.

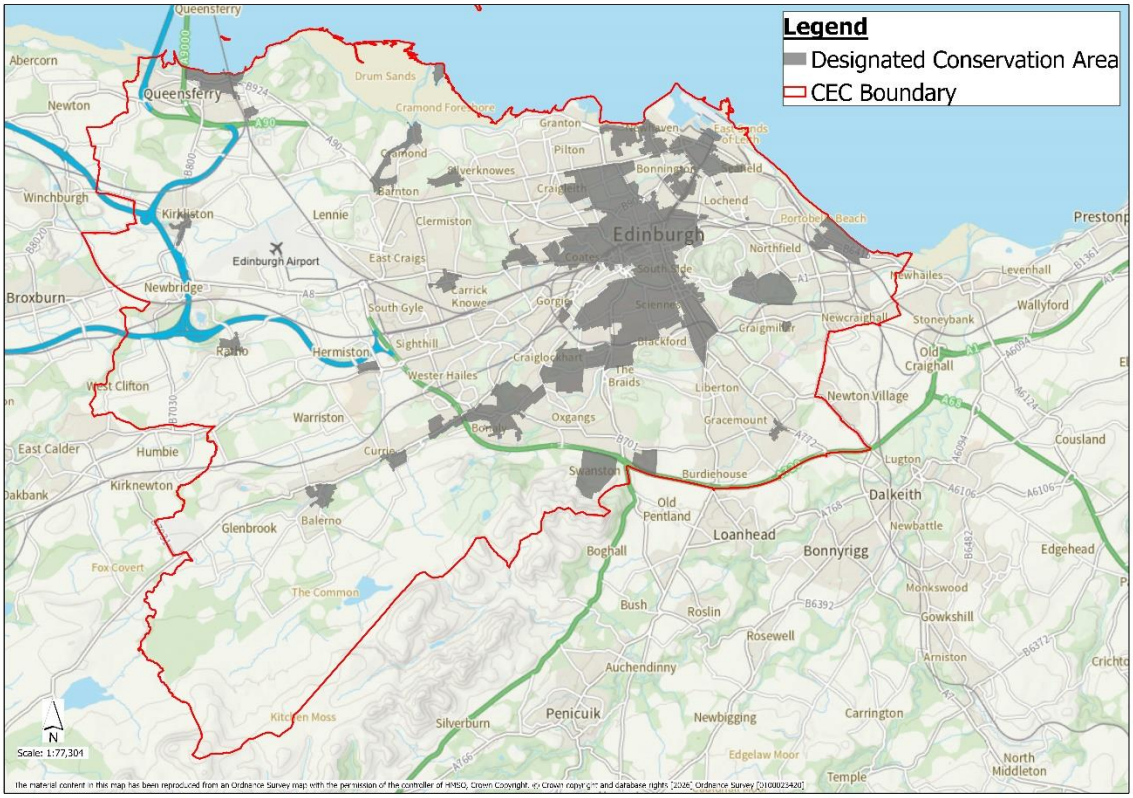


Figure 10.2: Conservation area coverage within the city

Each conservation area has a conservation area character appraisal. The appraisals act as a management tool which help to identify the special interest and changing needs of an area. Furthermore, they identify opportunities for development, planning action and enhancement. They provide the basis for statutory designation of boundaries and enable the Planning Authority to fulfil its statutory duty to preserve and enhance conservation areas (as noted above). Appraisals also inform policy and assist development management. They provide an opportunity to involve communities in identifying the character of the area and help developers formulate development proposals.

Currently there are two approved conservation area management plans (CMPs), which are for Inverleith Conservation Area and Leith Conservation Area. These management plans guide the preservation and enhancement of specific area, detailing objectives, actions, and controls for future development, alterations, and repairs. Furthermore, they establish a framework for improvement within the area.

Conservation Area	Date of Designation/ Amendment / Extension	Date of Approval of Character Appraisal

Abbeyhill Colonies	15/03/2013	15/03/2013
Balerno	1975, boundary amended May 1997	01/08/2000
Barnton	10/01/1997	29/11/2001
Blacket	13/01/1972	12/06/2003
Colinton	13/10/1977, boundary amended November 1993 and extended 2007	11/03/1999
Colonies (city wide)	15/03/2013	06/12/2012
Coltbridge and Wester Coates	1987, boundary extended 2003 and again in 2007	03/11/2005
Corstorphine	28/07/1977	05/06/2001
Craiglockhart	10/01/1997	27/03/2001
Craigmillar Park	1997, boundary extended 2007	12/06/2003
Cramond	13/10/1977	30/01/2001
Currie	28/06/1972, boundary extended 29/05/1987 and further extended October 2003	26/09/2000
Dalmeny	28/07/1977	01/08/2000
Dalry Colonies	01/08/2000	01/08/2000
Dean	20/02/1975, extended 17/07/1997, then extended after May 1997	02/10/2003
Duddingston	15/03/1975, boundary extended March 2007	07/02/2002
Gilmerton	13/10/1997, and subsequently amended, consultation on proposed amendment ongoing	01/08/2000
Grange	16/09/1983, boundary extended 29/03/1996	07/08/2014
Hawthornbank (North Fort Street) Colonies	15/03/2013	01/08/2000
Hermiston	20/06/1997	11/05/2000

Inverleith	October 1997, boundary amended 1996 and again in 2006	10/08/2006
Juniper Green	19/11/1993, boundary extended 09/03/2007	09/08/2001
Kirkliston	13/10/1977	26/09/2000
Leith	1998, Old Leith designated 1977 with subsequent amendments, Madeira designated 1975, boundary amended 30/08/2023 and again in 2022	18/04/2002
Lochend (Restalrig Park) Colonies	15/03/2013	01/08/2000
Marchmont, Meadows and Bruntsfield	09/01/1987, amended 29/03/1996	26/02/2020
Merchiston and Greenhill	25/05/1986, amended 29/03/1986	03/04/2003
Morningside	1996	04/10/2001
Morton Mains	1993	27/03/2001
New Town	October 1977, amended March 1980 and further amendment made in 1995	29/07/2017
Newhaven	1977	11/05/2000
Old Town	July 1977, amendments made in 1982, 1986 and 1996	10/02/2005
Pilrig	30/08/2013	08/08/2013
Plewlands	12/02/2010	03/12/2009
Portobello	13/10/1977, boundary amended in July 1985 and again in February 1998	11/05/2000
Queensferry	13/10/1977, boundary amended 2003 and again in 2015	30/01/2001
Ratho	13/07/1971, revised 29/05/1987	21/11/2001
Restalrig	15/03/2013	11/01/2017
Rosebank Colonies	15/03/2013	01/08/2000

Shandon	29/03/1996	18/04/2002
Shaw's Place (Pilrig) Colonies	15/03/2013	01/08/2000
Slateford (Flowers) Colonies	15/03/2013	01/08/2000
South Side	May 1975, boundary extended 1986, amended 1996, further amended 2019	08/08/2002
Stockbridge Colonies	15/03/2013	01/08/2000
Swanston	20/02/1975, boundary extended 19/11/1993	01/06/2001
Thistle Foundation	09/03/2007	04/10/2001
Trinity	1975, extended 1998, boundary change in 1988 and again in 2001	07/08/2019
Victoria Park	16/03/1998, boundary extended May 2008	16/04/1998
Waverley Park	13/10/1977	28/11/2002
West End	1980, amended 1995	09/03/2006
West Murrayfield	10/04/1986, boundary extended 09/03/2007	10/04/1986

Figure 10.3: List of Edinburgh's Conservation Areas

Inventory Gardens and Designed Landscapes

The inventory of gardens and designed landscapes was first published in 1987. In Edinburgh there are 17 designed sites recorded in the inventory of gardens and designed landscapes. HES maintains the inventory under the terms of the Ancient Monuments and Archaeological Areas Act 1979. In January 2016 one site - Northfield (Ref. GDL00302) was removed from the list of designated sited as it no longer met the criteria for inclusion on the inventory of gardens and designed landscapes. City Plan 2030 Policy Env 15 sets out policy regarding gardens and designated landscapes.

Reference	**Title**	**Parish**
Designated		
GDL00151	Dundas Castle	Dalmeny
GDL00356	The Drum	Edinburgh
GDL00308	Palace Of Holyroodhouse	Edinburgh

GDL00298	Newliston	Kirkliston
GDL00367	The New Town Gardens	Edinburgh
GDL00081	Cammo	Penicuik
GDL00319	Prestonfield House (Priestfield)	Edinburgh
GDL00334	Royal Botanic Garden, Edinburgh	Edinburgh
GDL00113	Craigiehall (amended 2019)	Dalmeny
GDL00115	Craigmillar Castle	Edinburgh
GDL00135	Dean Cemetery	Edinburgh
GDL00147	Duddingston House	Edinburgh
GDL00130	Dalmeny	Dalmeny
GDL00209	Hatton House	Ratho
GDL00255	Lauriston Castle	Edinburgh
GDL00286	Millburn Tower (amended 2016)	Ratho
GDL00272	Malleny (amended 2018)	Currie
Removed 2014–2018		
	Addistoun	Ratho
	Dalmahoy	Ratho
GDL00302	Northfield (removed January 2016 as no longer meets the criteria)	Currie
Recently Completed (from January 2021 to present)		
300053822	Dunbar's Close Garden, Canongate Edinburgh (Did not meet the criterion)	Edinburgh

Figure 10.4: Inventory of Gardens and Designed Landscape sites

HES is currently undertaking a project called 'Designed Landscapes of the Recent Past'. Begun in 2021, this is an initiative to identify, recognise and celebrate Scotland's modern garden and designed landscape heritage. It focuses on sites dating from 1945 to the early 2000s in Scotland. It aims to improve their representation in its publicly available records through photographic survey and recording for the National Record of the Historic Environment, updating information and images in online records and considering a select number for designation on the inventory of gardens and designed landscapes. A public online survey returned nominations for the following sites In Edinburgh:

Dunbar's Close Garden
Scottish Widows building
Jupiter Artland
Gallery of Modern Art (earthwork)
Scotstoun House
Heriot Watt campus
Montgomery Street Park
Japanese Garden Lauriston Castle

Sandeman House Garden
Storytelling Centre Garden
Saughton Park
Royal Bank of Scotland Headquarters
Gyle Business Park
Millbuies House, formerly known as the Suntrap Garden
Chancellors Court Halls of Residence, Pollock Halls
Mortonhall Crematorium
Ravelston Rise
A8 Edinburgh Airport Interchange
Royal Commonwealth Pool

Figure 10.5: HES - 'Designed Landscapes of the Recent Past' project site nominations

Of these, HES has progressed designation and recording work for Dunbar's Close Garden, Montgomery Street Park, Heriot Watt Campus, and Sandeman House Garden at Lauriston Castle.

In addition to the designed sites included in the inventory of gardens and designed landscape, a further 298 non-designated gardens and designed landscapes of interest across the council area have been identified by the Council. Of these sites, 45 have had a Council commissioned survey undertaken by suitably qualified professional company and using HES's inventory of gardens and designed landscape assessment criteria. Owing to funding, the survey work was not completed. Any further work to review the information held would be subject to funding. It is important the Proposed Plan recognises and considers the location and value of the designated and non-designated sites in terms of the spatial strategy and policies.

The list of 298 undesignated gardens and designed landscapes of interest across the Council area provides a useful source of information as to the extent and location of such non-designated sites of heritage interest. These represent another type of undesignated heritage that could potentially be included in a 'local list of historic gardens and landscapes' and mapped on the Council Atlas mapping system with a hyperlink to the gardens and designed landscape survey/data of the 45 sites that have been surveyed, which are listed in the table below:

Ashley House at Ratho	Inch Park
Atholl Crescent Garden	Ingliston
Baberton House	Kellerstain House
Balerno Villas	Kirklands
Bonnington House	Malleny Park
New Calton Burial Ground	Mortonhall

Old Calton Burial Ground	Mortonhall Crematorium
Castle Gogar	Newington Cemetery
Corstorphine Hill	Norton House
Craighouse	Davidson Mains and Oak Plantation
Craiglockhart	Pollock Halls
Cramond	Ratho Park
Dalry Cemetery	Riccarton
Dreghorn Castle and Barracks	Royal Edinburgh Hospital
Edmonstone	Rutland Square
Fettes College	Southfield House
Gogar Bank	Suntrap Garden
Gogar Mount	Tanfield
Gogar Park	Upper Cramond and Barnton
Gogar Burn	Warriston Cemetery
Hanley	Warriston Crematorium
Hatton	Woodhall
Hermiston House	

Figure 10.6: Undesignated gardens and designed landscapes

World Heritage in Edinburgh

Edinburgh has two world heritage sites, The 'Old and New Towns of Edinburgh' became a World Heritage Site in 1995 and the 'Forth Bridge' became a World Heritage Site in 2015. These sites are places of Outstanding Universal Value (OUV), recognised under the terms of the 1972 UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage. UNESCO requires every World Heritage Site to have a management plan which says how the OUV of the Site will be protected. OUV is the collection of attributes which make the area special and give Edinburgh's World Heritage Sites their international importance. Figure 10.7 shows the location of the two World Heritage Sites whilst the detailed maps can be viewed on City of Edinburgh Council Atlas.

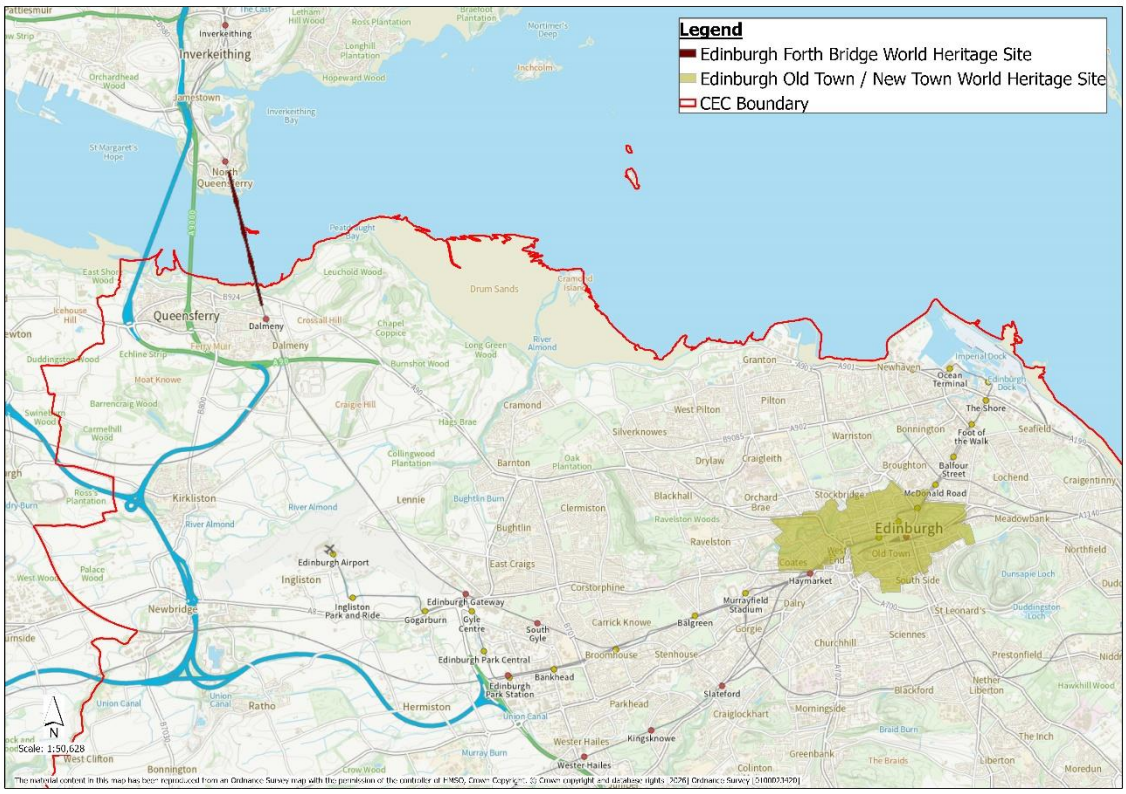


Figure 10.7: Map showing Edinburgh's two World Heritage Sites

UNESCO stated that The Old and New Towns of Edinburgh World Heritage Site 'represents a remarkable blend of two urban phenomena: organic medieval growth and 18th and 19th century town planning.' The Old and New Towns of Edinburgh World Heritage Site Management Plan 2025-2035 sets out what is significant about the site as a basis for understanding its important qualities and values and to determine that action necessary to protect and manage it. The protection of the skyline and key views within and to The Old and New Towns of Edinburgh World Heritage Site is important to help protect its unique OUV and its landmark features. The Edinburgh Design Guidance includes information on the protected skyline views which should be taken into account within the Proposed Plan when considering its spatial strategy and the any potential development sites.

The Forth Bridge, which crosses the Forth estuary, straddles the boundaries of City of Edinburgh Council and Fife Council. It was inscribed as a World Heritage Site by UNESCO in July 2015, as 'a masterpiece of creative genius' and is 'an impressive milestone in the evolution of bridge design and construction.' The scale and power of the Forth Bridge creates a visually dominant landmark and a number of designations around the Bridge ensure that it is protected at an appropriate level. There is the Forth Bridge Nomination for Inclusion in World Heritage List: Management Plan 2014-2019, which was produced by Historic Environment Scotland on behalf of the Forth Bridges Forum and published in 2015. UNESCO requested that a number of views be formalised in order to ensure the setting of the bridge is protected. To help further safeguard its setting, a viewpoint analysis identified a total of ten key views;

four of which lie within the council boundary. The protection of these key views and their characteristics will be a key planning consideration. More information on the key viewpoints within the council boundary is in the Key Viewpoints document.

In general, development in the north-west and particularly in and around Queensferry and Port Edgar must take into account any possible impacts on the Forth Bridge. The four key views of the Forth Bridge from within the council boundary are as identified in the table below:

4	Mons Hill, Dalmeny
5	Dalmeny Main Street near water tower
6	Station Road/ Bankhead Rd, Dalmeny
7	Forth Bridges Contact & Education Centre, Queensferry

Figure 10.8: Four views of the Forth Bridge within the Council boundary

Fife Council in partnership with the other members of the Forth Bridge World Heritage management plan working group, which includes the Council, prepared the draft Forth Bridge World Heritage Site Management Plan 2025-2035. On 4 December 2025, Fife Council approved the 2025-2035 draft management plan for public consultation. A finalised plan will be completed following the public consultation and this plan will be submitted through the UK Government Department of Culture, Media and Sport to UNESCO later in 2026. When approved it will replace the 2014-2019 nomination management plan.

Scheduled Monuments

HES is responsible for the statutory scheduling of monuments. There are 56 designated Scheduled Monuments in Edinburgh as recognised by Historic Environment Scotland, and which are protected by the Ancient Monuments and Archaeological Areas Act 1979. The quality of the records for scheduled monument within the area is generally adequate.

Reference	**Title**
SM3193	Wester Craiglockhart Hill, fort
SM2526	Cramond, Roman fort & civil settlement
SM3317	Portobello, Harbour Road, pottery kilns
SM2993	Edinburgh, Citadel Arch at Johnston Street
SM3528	Custom House, hydraulic crane & cabin S of, Albert Dock, Leith
SM3013	Edinburgh Town Wall, Flodden Wall, Drummond Street to Pleasance
SM3953	Bavelaw, steadings 60m NE of Redford Bridge
SM4112	Brunstane, enclosure 250m E of

SM4118	Caerketton Craigs, cairn
SM3988	Galachlaw, cairn
SM2901	Edinburgh Town Wall, Flodden Wall and Telfer Wall, Heriot Place
SM2418	Martello Tower, Leith
SM3012	Edinburgh Town Wall, Flodden Wall, Johnston Terrace to Grassmarket
SM4573	Gogar Mains, fort, palisaded enclosure and field system 850m SSE of
SM1899	Earl Cairnie or Harlow Cairn, cairn, The Warrens
SM1900	Craigie Hill, fort
SM1195	Leith Links, artillery mounds
SM1154	Easter Norton, standing stone 280m WSW of
SM1155	Caiy Stane, standing stone, Fairmilehead
SM1160	Huly Hill, cairn & stone circle SW of Newbridge roundabout
SM1161	Tormain Hill, cup & ring marked rocks 700m NE of Bonnington Mains
SM1198	Craiglockhart Castle
SM1183	Catstane, inscribed stone and long cist cemetery 690m E of Carlowrie
SM1184	Dalmahoy, cross slab, St Mary's Church
SM11097	Union Canal, Fountainbridge to River Almond
SM5818	Blackford Hill, fort and settlement
SM5884	Hanging Stanes, gallows bases, Braid Road
SM5683	Leith, dry dock off Sandport Street
SM6190	Baberton Mains, enclosure 400m W of
SM90129	Craigmillar Castle, castle and gardens
SM6188	Harlaw, enclosure 300m NW of
SM6189	Cammo, standing stone
SM90133	St Triduana's Aisle, chapel and wellhouse
SM6038	Home Farm, enclosure 300m ENE of
SM6440	Cammo Canal
SM1172	Kaimes Hill, fort
SM6200	Lennox Tower
SM6229	Craigpark Quarry, enclosure 450m W of
SM6436	Inch Garvie, Firth of Forth, defensive installations
SM6256	Dalmeny Park, enclosures 420m N of Mansion Hill
SM6635	Clubbiedean Reservoir, fort
SM1158	Lochend Farm, standing stone 100m WNW of
SM1213	Dalmahoy Hill, fort
SM3332	Inchmickery, fortifications
SM1197	Colinton Castle

SM1156	Liberton, standing stone, E end of Ravenswood Avenue
SM10580	Brunstane, moated site 50m NNE of
SM13031	Holyrood Abbey, precinct and associated remains
SM13032	Holyrood Park
SM13589	Niddrie, standing stone 65m SSE of 160 Greendykes Road
SM13607	Liberton Battery, anti-aircraft battery 100m E of Liberton Kennels
SM13612	Hunter's Craig or Eagle Rock, rock carving, Dalmeny
SM13684	Cramond Island, First World War and Second World War defences
SM13686	Hound Point Battery, 150m W of Fishery Cottage
SM13717	Dreghorn Woods training trenches, 425m WSW and 350m SW of Redford Bridge, Edinburgh
SM90130	Edinburgh Castle

Figure 10.9: Scheduled Monuments – Designated sites

HES does not currently have any open cases relating to either amendment or scheduling cases or ongoing scheduling project work within the council area. However, HES is carrying out a nationwide review of scheduled monuments that survive as buried archaeological remains and that are known through crop marking. It expects to begin a review of those in the council area (7 scheduled monuments) within the next 10 years.

Scheduling identifies heritage assets of national significance, and the designation records are important in providing an understanding of each monument. Applications for works that affect a scheduled monument are processed by HES, in the form of an application for 'scheduled monument consent'. Planning applications for developments that may affect a scheduled monument and/or its setting are determined by the Council as planning authority and HES is a statutory consultee. Many types of development have the potential to impact on a monument and/or its setting and applications are considered on a case-by-case basis.

Careful consideration of such proposed developments will be required. Setting of a scheduled monument often extends beyond the monument to the wider landscape and can be a contributing factor in landscape character, for example Edinburgh Castle and the OUV of the Old and New Towns of Edinburgh World Heritage Site.

Consideration will be given to the policy and guidance developed in the Proposed Plan to protect monuments with an important setting tied into the wider landscape setting, such as Edinburgh Castle.

Archaeology

In addition to the statutory scheduled sites, there are a number of known archaeological sites of significance within the area. NPF4 recognises the need to protect and preserve non-designated heritage assets and there is an opportunity to

engage with communities to aid identification and protection through Local Place Plans, Call for Ideas or future engagement. City Plan 2030 policies Env 16 and Env 17 protect important archaeological remains and sites of archaeological significance. It is important that the Proposed Plan continues to recognise the value and protection of the city's archaeology.

Historic Battlefields

The inventory of historic battlefields was established in 2011. There are no inventory historic battlefields designated in the Council area.

Sustaining Heritage Assets and Places

This part discusses cross-cutting evidence related to sustaining heritage historic environment, covering the following areas:

- Buildings at Risk
- Edinburgh vacant and derelict land
- Building condition
- Climate crisis.

The historic environment is not only a finite resource that requires protection but one that also delivers the places and spaces that are key to our everyday lives, cultural identity, sense of place and wellbeing. It holds a broad diversity of heritage assets that are important to local people. The identification and protection of local undesignated heritage is key to sustaining historic environment.

The introduction of Local Place Plans (LPPs) under the new planning system established by the 2019 Act presents new opportunities for the recognition and management of heritage assets and sites. This new right for communities to produce their own plans will enable them to identify local heritage, buildings, sites and artefacts, which may currently be undesignated and/or are intangible in nature, but are of importance to the history, distinctiveness and identity of the local area. The Call for Ideas stage and future engagement will also be opportunities for communities to identify buildings or sites that they would like to conserve.

At present the Council does not hold records of undesignated sites and monuments. The Proposed Plan will need to explore how identified undesignated heritage buildings or sites could be retained.

Cemeteries, Churchyards and Burial Grounds

The Council Cemetery Strategy (2021) sets out the six objectives of the cemetery service. The provisions include, but are not limited to, managed cemeteries, including those within the Old and New Towns of Edinburgh World Heritage Site.

It identifies a number of guiding principles, including but not limited to, the protection and enhancement of the historic landscape, built heritage and biodiversity to promote a thriving greenspace.

The Council owns and operates 42 cemeteries, churchyards and burial grounds across the city. The majority of these are statutory listed as being of special architectural or historic interest and the majority are located within a conservation area. The locations are listed in the table below.

City Centre	**Conservation Area**
Canongate Burial Ground, Gates, Gate piers, Boundary Walls and Railings (Category A - LB26823)	Old Town
Greyfriars Churchyard, Including Monuments, Lodge Gate piers, Railings and Walls Greyfriars Place, (Category A - LB27029)	Old Town
New Calton Burial Ground, Including Watch Tower and Boundary Walls, Regent Road (Category B - LB27931)	New Town
Regent Road, Calton Old Burial Ground and Monuments, Including Screen Walls to Waterloo Place (Category A - LB27920)	New Town
St Cuthbert's Church (Church of Scotland), Churchyard and Monuments, Boundary Walls Gate piers and Railings, Lothian Road (Category A - LB27339)	New Town & Old Town
Operational	
Comely Bank Cemetery	-
Corstorphine Hill Cemetery	-
Craigmillar Castle Park Cemetery	-
Currie Parish Church, Churchyard (Original Area Only) Kirkgate, Currie (Category B - LB6140)	Currie
Edinburgh Southern Cemetery (Grange), Including Boundary Walls, Railings, Gates and Gate piers, Grange Road and Beaufort Road, (Category B - LB30396)	Grange
Kirkliston Parish Church with Watch House and Graveyard, Walls and Gate piers, High Street, Kirkliston Village, (Category A - LB27457)	Kirkliston
Liberton Parish Church with Memorials, Session House, Graveyard, Gates and Gate piers, Walls and Railings, 5a, 5b and 5c Kirkgate (Category A - LB27090)	-
Belhaven Place, Gate piers and Railings Formerly to Morningside Cemetery (Category C -LB50969)	Plewlands
Mortonhall	-
Portobello Cemetery and Lodge House with Gates, Railings, Gate piers, Boundary Walls and Pavilion, 200 Milton Road East (Category B - LB27103)	-

St Mary's Church with Session House, Graveyard, Walls and Gate piers, Ratho Village, Baird Road, (Category A - LB27685)	Ratho
Rosebank	-
Saughton	-
South Queensferry	-
Non operational	
former Buccleuch Parish Church, Chapel Street (Category A - LB26785)	South Side
St Cuthbert's Parish Church (Church of Scotland) and Churchyard with Boundary Wall, Offertory House, and Gates, Dell Road (Category B - LB26874)	Colinton
St. Cuthbert's Churchyard, The Dell Colinton (Category B - LB26875)	Colinton
Corstorphine Old Parish Church and Churchyard Including Boundary Walls, Vault and Gate House, Gate piers, Gates and War Memorial, Kirk Loan and 2a Corstorphine High Street Category A - (LB26888)	Corstorphine
Cramond Parish Church (Church of Scotland) Including Graveyard, Gatehouse, Gate piers, Gates and Boundary Wall, (18 Cramond Glebe Road Category A - (LB26912)	Cramond
St Cuthbert's, Church of Scotland, Including Churchyard, Dalmeny Village, 20 Main Street, Dalmeny (Category A - LB5570)	Dalmeny
Dalry Cemetery, Gate piers, Boundary Walls and Railings, Dalry Road (Category C - LB26733)	-
Duddingston Parish Church (C Of S) Including Churchyard and Watch Tower, Old Church Lane, Duddingston Village (Category A - LB26924)	Duddingston
Newington Old Burial Ground, Including Boundary Walls and Watchtower, 31 East Preston Street and Dalkeith Road (Category B - LB27934)	South Side
Former Gogar Parish Church and Graveyard, 194 Glasgow Road (Category B - LB27268)	-
Newington (Echobank) Cemetery, Including 222 Dalkeith Road (Lodge), Vaults, Gates, Gate piers and Boundary Walls, Dalkeith Road (Category B -LB27933)	Waverley Park
North Leith Burial Ground, Coburg Street (Category B - LB26735)	Leith
Ardmillan Terrace North Merchiston Cemetery with Lodge Gates and Boundary Walls (Category C -LB26704)	-

The Vennel, Old Burial Ground, South Queensferry, Boundary Walls, Gate piers, Bee-Boles and Monuments (Category B - LB40405)	South Queensferry
Restalrig Parish Church (Church of Scotland) Including Graveyard, Gatehouse and Boundary Walls and Excluding Scheduled Monument No 90133 'St Triduana's Aisle, Chapel and Wellhouse', 7 Restalrig Road South (Category A - LB27250)	Restalrig
Jewish Burial Ground with Graveyard Walls, Gates and Railings, Sciennes House Place (Category B -LB30476)	Grange
St Mary's (South Leith Parish) Church (C Of S) With Graveyard, Walls, Gates and Railings, 1 and 2 Kirkgate (Category A - LB27466)	Leith
Warriston Cemetery, With All Monuments, Catacombs, Bridge, Boundary Walls, Gates and Gatepiers, Warriston Road (Category A - LB27937)	-

Figure 10.10: Locations of Council owned cemeteries, churchyards and burial grounds

Several of the Council owned cemeteries, churchyards and burial grounds within the table also contain buildings such as churches, chapels, lodges and other structures etc. that are statutory listed buildings.

In addition to the above Council owned cemeteries, churchyards and burial grounds, there are also privately owned within the city, including Dean Cemetery (Category A - LB27924 and located within The Dean Conservation Area).

Crematoriums

There are currently 3 large operating crematoriums with the council area. Warriston and Seafield are private and Mortonhall is owned by the Council. The Council's Bereavement Service considers that these crematoriums are aged and require modernisation or upgrading but will not require expansion/additional land take. Seafield Crematorium is category B listed (LB27095) and Mortonhall Crematorium is category A listed (LB43242).

Buildings at Risk

The Buildings at Risk Register (BARR) has been managed and maintained by HES since 2015. It was not a statutory list but provides a useful tool for the identification and monitoring of properties of architectural or historic interest considered endangered through dereliction or vacancy and which might be suitable for restoration. On 3 September 2024 HES published a review of the BARR, focusing on assessing its impact in bringing buildings back in to use in order to make evidence-based recommendations for its long-term future. The report found insufficient evidence to demonstrate that the BARR has had a significant impact in bringing buildings back into use. HES therefore took the decision to pause the BARR in order

to consider long-term options for its future. The BARR remains paused. On the date it was paused, there were 77 buildings in Edinburgh including in the BARR. The website remains accessible and searchable during this time, but it has not been updated since it was paused, and HES is not accepting nominations for additions to the Register.

The table below identifies the buildings on the BARR, recognising that this is not up-to-date and there has been progress on some entries in bringing them back into use.

Building Name/Address	Listing	Category	Condition	Category of Risk
71, Dalkeith Road	C	at risk	good	low
Astley Ainslie Hospital Balfour Pavilion West Wing, 143, Grange Loan	unlisted	at risk	poor	moderate
Western Pavilion, Inverleith Row	unlisted	at risk	fair	high
South Lodge Hermiston House	B	at risk	poor	moderate
Astley Ainslie Hospital Sentry Pavilions, 143, Grange Loan	unlisted	at risk	very poor	moderate
Beechmount House Lodge, 102, Corstorphine Road	B	at risk	poor	moderate
Lauriston Castle Gate House, 2a, Cramond Road South	A	at risk	poor	moderate
Astley Ainslie Hospital Millbank Pavilion, 143, Grange Loan	B	at risk	poor	moderate
Gracemount House, 128, Lasswade Road	B	restoration in progress	poor	high
Astley Ainslie Hospital Occupational Therapy Training Centre Huts, 143	unlisted	at risk	poor	high
13, Meadow Lane	unlisted	at risk	poor	moderate
26, Bonnington Road	C	restored		low
Edinburgh and Leith Gas Works NE Ranges, 1 - 5, Baltic Street, Leith	B	at risk	poor	low
John Street Lane West Garage, John Street Lane West	unlisted	at risk	poor	moderate
Duddingston Byre, The Causeway	unlisted	at risk	ruinous	moderate
Edinburgh and Leith Gas Works Offices, 1 - 5, Baltic Street, Leith	B	at risk	poor	moderate
Tynecastle High School, McLeod Street	B	at risk	fair	low
South Farm Steading, 69, Ravenscroft Street, Gilmerton	unlisted	at risk	poor	high

134, Constitution Street, Leith	B	at risk	fair	low
Royal Victoria Hospital East Lodge and Gateway, Craigleith Road	B	at risk	fair	moderate
Royal Victoria Hospital Administration Block, Craigleith Road	B	at risk	poor	moderate
Newington Cemetery Watch Tower, 31, East Preston Street, Newington	B	at risk	poor	moderate
Lauriston Castle Greenhouse, Cramond Road South	A	at risk	poor	moderate
46, Park Road, Newhaven	C	restoration in progress	poor	moderate
Old Kirk Of Edinburgh and Church Hall, 37, Holyrood Road	unlisted	at risk	poor	moderate
East Lodge, 100, The Wisp, Edmonstone	B	at risk	ruinous	high
9, Montgomery Street Lane	C	at risk	very poor	moderate
Mews Building, 83-85, East Claremont Street	A	at risk	poor	moderate
County Cinema, 14, Bath Street, Portobello	C	at risk	poor	moderate
Corstorphine Youth & Community Centre, 13-14, Kirk Loan, Corstorphine	unlisted	at risk	ruinous	high
Gracemount House Stables, Gracemount House Drive	B	at risk	poor	moderate
Edmonstone House South Lodge & Gates, 545, Old Dalkeith Road	B	at risk	ruinous	critical
Leith Walk Primary School Janitor's Lodge, 8, Brunswick Road	B	at risk	poor	moderate
Cramond Bridge Mill (Former), Cramond	B	at risk	poor	moderate
Ratho Park Doocot, Ratho	B	at risk	ruinous	low
Granton Gas Holder, Granton	B	restored		low
Drylaw House Doocot, Wester Drylaw Place	C	at risk	ruinous	low
Comiston House Doocot, Camus Avenue	B	at risk	poor	moderate
Craighouse: Boiler Room Annexe, Craighouse Road	A	restoration in progress	fair	low

Comiston Springs Water House, near Swan Spring Avenue	B	at risk	fair	low
Comiston Springs: Peewit Spring Head 2, Oxgangs Green	B	at risk	very poor	high
Comiston Springs: Peewit Spring Head 1, Oxgangs Street	B	at risk	poor	moderate
Police Station (Former), 55, Abbeyhill	B	at risk	fair	low
Police Call Box, Pleasance	B	restored	poor	low
New Calton Burial Ground Watch Tower, Regent Road	B	at risk	poor	moderate
Edinburgh and Leith Gas Works: Processing Plant (Former), 1-5, Baltic Street, Leith	B	at risk	ruinous	high
22, John's Lane, Leith	C	at risk	ruinous	high
Hatton House: Garden Temple, Wilkieston	B	at risk	poor	moderate
Cammo House Walled Garden with outbuildings, Cammo Road	C	at risk	ruinous	moderate
Redhall House, 7, Redhall House Drive	B	at risk	poor	high
Leith Theatre, 29-30, Ferry Road, Leith	B	at risk	fair	low
West Pier, Port Edgar, South Queensferry	C	at risk	poor	moderate
5, Downie Terrace, Corstorphine	C	at risk	fair	low
Madelvic Car Factory (Former): Production Block, 37, Granton Park Avenue	B	at risk	very poor	critical
Port Edgar Barracks/ Naval Hospital, South Queensferry	B	at risk	very poor	high
Mortonhall House Burial Ground, Frogston Road East	A	at risk	good	low
Upper Floors, 29-31, George Street	A	at risk	fair	low
Clifton Hall Doocot, Clifton Hall, Newbridge	A	at risk	fair	low
Royal High School (Former): Lodge, Regent Road	A	at risk	fair	low
Royal High School (Former): Eastern Pavilion, Regent Road	A	at risk	fair	low

Royal High School (Former): Western Pavilion, Regent Road	A	at risk	good	low
Warriston Cemetery Extension, Warriston Road, Warriston	A	at risk	poor	moderate
Warriston Cemetery, Warriston Road, Warriston	A	at risk	poor	moderate
Ravelrig Doocot, Lanark Road West, Balerno	A	at risk	poor	high
Hatton House South Terrace, Wilkieston	A	at risk	poor	high
Addistoun Doocot, Ratho	A	at risk	poor	moderate
Coach house (former), 3, Dublin Street Lane North	A	restoration in progress	fair	low
Skivvys Public House (Former), 15, Duke Street, Leith	unlisted	at risk	poor	moderate
Ravenscroft Cottages, 81 - 83, Ravenscroft Street, Gilmerton	unlisted	at risk	poor	moderate
Generating Station, 95, McDonald Road	B	at risk	poor	low
The Tron Kirk (Former), 122, High Street	A	at risk	fair	moderate
Odeon Cinema (Former), 7, Clerk Street	A	restoration in progress	fair	low
Royal High School (Former): Main School Building, Regent Road	A	at risk	fair	low
St Paul's Church (Former), 9, Lorne Street, Leith	B	at risk	fair	low
2/ Rear of 125, North Grays Close/ High Street	B	at risk	ruinous	high
Cammo House Stables, Cammo Road	B	at risk	ruinous	moderate
St James's Episcopal Church and Hall (Former), 119, Constitution Street, Leith	B	restoration in progress	poor	low

Figure 10.11: Edinburgh's Buildings at Risk as identified within the paused BARR

NPF4 Policy 7(m) specifically supports the sensitive reuse of 'at risk' buildings as well as the principle of conserving and recycling assets. The challenge of the long-term 'at risk' buildings on the Edinburgh BARR and other historic buildings in the city which are also vulnerable point to the need to consider a more proactive approach to their reuse. These buildings present challenges and opportunities in terms of the communities in which they are situated, and the services that they require.

The Proposed Plan when potentially identifying development sites should take cognisance of any ‘at risk’ or vacant historic buildings and explore ways that these could be retained and conserved as part of wider development schemes.

Vacant and Derelict Land

NPF4 places emphasis on the redevelopment of brownfield sites. In relation to the historic environment, redevelopment of brownfield sites can include bringing buildings at risk back into use again and offer opportunities to address unsightly gaps/sites in conservation areas. The Council’s includes 4 sites located within designated conservation areas and these are listed in the table below:

Name of Site	Site Type	Site size	Previous use
Jeffrey Street	derelict (building remains)	0.29	manufacturing
40 Hermiston	vacant land and buildings	0.57	agricultural
1-19 Keir Street	vacant land	0.16	residential
Roseburn Terrace	derelict (building remains)	0.49	transport

Figure 10.12: Vacant and Derelict Land sites within designated conservation areas

There are no scheduled monuments within the sites but there are three listed buildings and many are located close to heritage assets. All have the potential to include as yet undiscovered, undesignated heritage. In addressing these sites in the Proposed Plan, it will be important to ensure recognition of the heritage. The Proposed Plan when potentially identifying development on these sites, it should take cognisance of any ‘at risk’ or vacant historic buildings and explore ways that these could be retained and conserved as part of wider development schemes.

Summary of stakeholder engagement

Key Agency	Historic Environment Scotland (HES)
Main views raised	• **Scoping (May 2025):** No comments • **Draft Topic Papers (Nov 2025):** HES content with the evidence set out in the topic paper at this stage and have no detailed comments to offer. • **Final Topic Papers (March 2026)** No comments
Council response and implications for the proposed plan	HES does not dispute any of the evidence set out in the topic paper.
Is the agency content with the evidence?	HES have advised: 'We have given consideration to matters within our remit and expertise, with a view to the sufficiency of the evidence presented. We are in general agreement with the evidence presented, and to not wish to raise any issues of dispute.'
Areas of agreement	There are no outstanding issues.
Outstanding issues	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.
Actions for proposed plan stage	HES does not dispute any of the evidence set out in the topic paper.

Key Stakeholder	Homes for Scotland (HfS)
Main views raised	HfS requested the following additional evidence be considered: Scottish Index of Multiple Deprivation 2020 The Links between Scotland's Historic Environment and Wellbeing Church of Scotland, Report of the General Trustees, 2022 SEPA flood maps
Council response and implications for the proposed plan	Housing need matters are addressed in the Housing Land Topic Paper and are for consideration in preparing the Proposed Plan. Potential constraints to/conflicts with the delivery of housing need and place and the deliver net zero and energy efficiency relating to policies/guidance that support the

	retention of listed buildings and the preservation or enhancement of their character, appearance and setting, and also, the protection of scheduled ancient monuments, are addressed in this topic paper and/or linked topic papers: Topic 7 Zero waste, energy heating and cooling, and Topic 08 and 09 Climate change and climate mitigation are for consideration in preparing the Proposed Plan. Relevant evidence sources have been considered where applicable to the topic paper.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Housing need and place, net zero and energy efficiency matters and climate mitigation and adaption relating to this subject can be considered in preparing the Proposed Plan.

Summary of implications for the Proposed Plan

Given the importance of the historic environment for Edinburgh, in developing the Proposed Plan it will be important to ensure that its spatial strategy and planning policies reflects best practices for conserving and managing the historic environment including setting and key views.

The Proposed Plan will continue to use the Buildings at Risk Register when considering site allocations and place-based strategy. The register has been used as information to inform the Urban Capacity Study which forms part of the Evidence Report.

The Proposed Plan when potentially identifying sites should take account of any ‘at risk’ or vacant historic buildings and explore ways that these could be retained and conserved as part of wider development schemes.

Any scheduled monuments identified through HES’s nationwide review of scheduled monuments that survive as buried archaeological remains and that are known through crop marking, should inform the site appraisal process for the Proposed Plan.

Buildings de-listed by HES may no longer meet the criteria for statutory listing but may be important locally for historic and cultural reasons. These, and other undesignated historic buildings, are often important to local communities and may be

identified through Local Place Plans, Call for Ideas, other engagement opportunities and through reviews of conservation area character appraisals. Consideration should be given to the establishment of a local list of historic buildings and sites and explore ways that these could be retained and conserved as part of wider development schemes.

It is important the Proposed Plan recognises and considers the location and value of the city's conservation areas in terms of the spatial strategy and policies, which also might include their setting. It is also an opportunity to consider whether there should be other conservation area designation or boundary amendments as part of the Proposed Plan; for example, that are raised through Local Place Plans or the Call for Ideas.

The Council's list of 298 undesignated gardens and designed landscapes of interest represent a type of undesignated heritage that could potentially be included in a 'local list of historic gardens and landscapes' and should inform the site appraisal process for the Proposed Plan. The Landscape Review undertaken as part of the Evidence Report also contains relevant information.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

11: Design, quality and placemaking

Topic	**11: Design, quality and placemaking**
Description of topic	Review and analysis of information on the context, characteristics and connectivity of Edinburgh.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5)(a) - the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district
Relevant NPF4 Policies	• Policy 14 Design, quality and place
Local Development Plan Guidance	• Place-based (p9) sets out that LDPs should use the Place Principle to promote 'a joined-up and collaborative approach to decisions about a place's assets and services' which includes 'thinking about places in the round.' • Design, quality and place guidance (p57) sets out that the Evidence Report is likely to include information that informs an understanding of local context, characteristics and connectivity. It signposts that this may include Place Standard Tool engagement, Design charrettes, Local Place Plans, other community-led plans, as well as Design Review Panel findings.
Linked Topic Papers	• All other topic papers • Place Profiles
List of and links to evidence	• **CD130** Creating Places: A Policy Statement on Architecture and Place, Scottish Government, June 2013 • **CD174** Place Principle, Scottish Government, April 2019 • **CD175** Place Standard, Scottish Government, June 2024 • **CD066** Non Statutory Guidance - Edinburgh Design Guidance, City of Edinburgh Council, September 2025 • **CD067** Non Statutory Guidance - Listed Buildings and Conservation Areas guidance, City of Edinburgh Council, September 2025 • **CD070** Non Statutory Guidance - Guidance for Householders, City of Edinburgh Council, September 2025 • **CD298** Edinburgh Street Design Guidance - Detailed Design Manual Factsheet P09 - Women's Safety, City of Edinburgh Council, 2024

- **CD297** Edinburgh Street Design Guidance, City of Edinburgh Council March 2022
- **CD389** Women's Safety in Public Places Community Improvement Partnership Annual Update Report, City of Edinburgh Council, May 2024
- **CD287** Edinburgh as a Feminist City Working Group Update Committee Report, City of Edinburgh Council, January 2026
- **CD593** Secured by Design - List of Development Guidance Documents, Police Crime Prevention Initiatives Limited
- **CD600** Place and Wellbeing: Integrating Land Use Planning and Public Health in Scotland, Public Health Scotland + Improvement Service, March 2024
- **CD525** Integrating Land Use Planning and Child Poverty, Improvement Service, March 2024
- **CD113** A Connected Scotland: Our strategy for tackling social isolation and loneliness and building stronger social connections, Scottish Government, December 2018
- **CD076** City Mobility Plan 2021-2030, City of Edinburgh Council, February 2021
- **CD131** Designing Streets, Scottish Government, March 2010
- **CD671** Cycling by Design, Transport for Scotland, March 2026
- **CD426** City of Edinburgh Skyline Study, Colvin and Moggridge Landscape Architects, October 2010
- **CD343** Public Art Policy, City of Edinburgh Council, February 2025
- **CD639** Place Guide: A process for improved Place-based decision making, Scottish Futures Trust, December 2021
- **CD122** Circular 1/2022: Local Place Plans, Scottish Government, January 2022
- **CD050** Edinburgh's Local Place Plans Register, City of Edinburgh Council, 2024
- **CD284** Directory of place briefs, frameworks and masterplans, City of Edinburgh Council
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023

List of matters covered

This topic paper sets out the evidence in relation to the design quality and placemaking of the City of Edinburgh Council area. It is structured around the Six Qualities of Successful Places. It covers:

- National Context
    - Creating Places
    - Place Principle
    - Place Standard
- Local Context
    - City Plan 2030
    - Edinburgh Design Guidance and other planning guidance
    - Healthy
    - Pleasant
    - Connected
    - Distinctive
    - Sustainable
    - Adaptable
- Place-Based Approach
    - Place Profiles
    - Local Place Plans
    - Place briefs, development briefs, frameworks and masterplans

Summary of evidence

National Context

Creating Places: A Policy Statement on architecture and place for Scotland

In June 2013 the Scottish Government published a policy statement setting out the comprehensive value that good design can deliver. The policies within the statement are material considerations in determining planning applications.

Good design is defined as something that delivers physical, functional, social and environmental value, while providing viability and representing good value for money. The statement set out achieving quality architecture and places as among the most important outcomes that the planning process exists to support.

This Policy Statement informed the updated National Planning Framework 4 (NPF4), including the development of the ‘six qualities of successful places’. It also led to the development of the Place Standard Tool. It affirmed the role of Architecture and Design Scotland as the key Executive Non-Departmental Public Body for supporting in the delivery of the policy statement. It is therefore the key national stakeholder for this topic paper.

Place Principle

In April 2019 the Scottish Government and the Convention of Scottish Local Authorities (COSLA) agreed to adopt the Place Principle. This recognises the following:

1. Place is where people, location and resources combine to create a sense of identity and purpose and is at the heart of addressing the needs and realising the full potential of communities

2. Places are shaped by the way resources, services and assets are directed and used by the people who live in and invest in them
3. A more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place, enables better outcomes for everyone and increased opportunities for people and communities to shape their own lives.

Place Standard

The Place Standard is a tool for discussing and evaluating the qualities of a place. It contains 14 themes that support the Six Qualities of Successful Places. NPF4 Policy 14 states that planning authorities should use the Place Standard tool in the preparation of local development plans and design guidance to engage with communities and other stakeholders. The Place Standard tool has been used to structure engagement exercises. This includes using the tool the guide the structure of the online survey 'What makes a good place?' which ran from 10 October 2025 to 23 January 2026. It was also used to aid with in-person engagement sessions especially with children and young people, such as completing the tool in groups to discuss their views of their area.

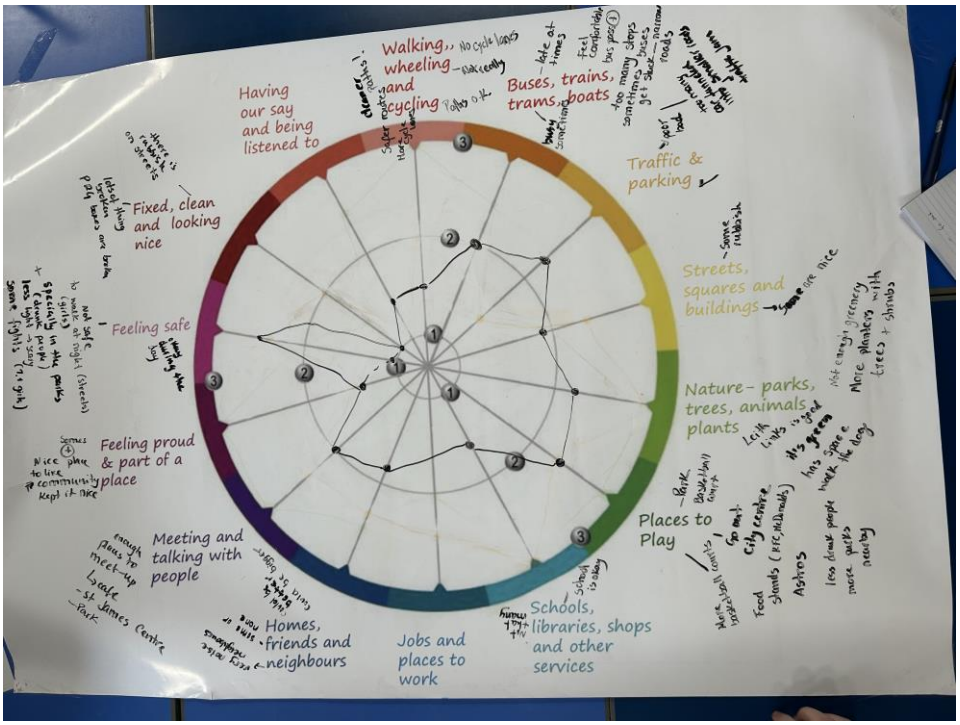


Figure 11.1 A completed Place Standard wheel following an engagement event with students at Leith Academy, April 2025

Local Context

City Plan 2030

City Plan 2030 which was adopted by City of Edinburgh Council in November 2024 contains a number of design related policies as follows:

- Env 1 Design Quality and Context

- Env 2 Co-ordinated Development
- Env 3 Development Design – Incorporating and Enhancing Existing and Potential Features
- Env 4 Development Design – Impact on Setting
- Env 5 Alterations, Extensions and Domestic Outbuildings
- Env 6 Green Blue Infrastructure
- Env 7 Sustainable Developments
- Env 8 New Sustainable Buildings
- Env 25 Layout Design
- Env 26 Housing Density
- Env 27 Public Realm, New Planting and Landscape Design
- Env 28 Urban Edge Development
- Env 29 Waterside Development
- Env 30 Building Heights
- Env 31 Useable Open Space in New Development
- Env 32 Useable Communal Open Space and Private Gardens in Housing Development
- Env 33 Amenity
- Env 34 Pollution and Air, Water and Soil Quality
- Env 35 Reducing Flood Risk
- Env 36 Designing for Surface Water
- Env 37 Designing-in Positive Effects for Biodiversity
- Env 38 Shopfronts

The aim of these policies is to ensure high-quality design which reinforces the city's identity, protects what is of value, plays it part in addressing the climate emergency and help delivers good places. It is important that the Proposed Plan assesses the design policies in the development plan and ensures that any future design policies are relevant and respond to the Edinburgh context.

Edinburgh Design Guidance and other relevant planning guidance

The Edinburgh Design Guidance is non-statutory, supplementary planning guidance to City Plan 2030. The guidance sets out the Council's expectations for design quality in new development. The document is reviewed annually along with the other non-statutory planning guidance. Following the adoption of National Planning Framework 4 by the Scottish Government in February 2023 and City Plan 2030, the Edinburgh Design Guidance was updated. The updated draft was consulted on publicly from 9 January to 4 April 2025. The draft was finalised in response to this consultation and approved by Planning Committee on 10 September 2025. The guidance represents a material consideration in the determination of planning applications and is a point of reference and a basis for planning, design and communication of all development proposals.

There are also a number of approved place briefs, development briefs, frameworks or masterplans which provide detailed information and guidance about the context, characteristics, connectivity and likely future change of the area. The place-based approach section of this topic paper provide more detail of the Council's approach to guiding the development of specific sites.

Edinburgh Urban Design Panel

The Council also has the Edinburgh Urban Design Panel. This was established in 2009 to provide constructive urban design advice, and to promote sustainable development and equality at an early stage in the design process. The Panel's discussion with a developer and/or design team is summarised in a written report which is then used to inform the development of designs. Advice on planning strategy is used to inform the drafting of policies and guidance. The Panel is made up of voluntary representatives from the following member organisations:

- Cockburn Association
- Edinburgh Architectural Association
- Edinburgh School of Architecture and Landscape Architecture, University of Edinburgh
- Edinburgh World Heritage (for development proposals in or significantly impacting on the Old and New Towns of Edinburgh World Heritage Site)
- Historic Environment Scotland
- Landscape Institute Scotland
- NatureScot
- Police Scotland
- Royal Town Planning Institute Scotland
- School of Energy, Geoscience, Infrastructure and Society, Heriot Watt University
- Transport Research Institute, Edinburgh Napier University

Six Qualities of Successful Places

This topic paper will consider the following key considerations and characteristics specific to Edinburgh for each of the six qualities of successful places. This topic paper aims not to repeat the content of other topics covered in the Evidence Report. Where content is covered in another topic paper this will instead be signposted

Healthy

This quality relates to supporting the prioritisation of women's safety and improving physical and mental health. Most of the evidence related to this quality is covered in Topic 16 Health and wellbeing. The evidence not covered elsewhere is set out as follows:

The Equally Safe Edinburgh Committee is a partnership between organisations which work to put into practice COSLA's Equally Safe Strategy across Edinburgh.

Between June and September 2022, the Committee carried out engagement work on Women's Safety in Public Places. This consultation highlighted the importance of well-lit public spaces, a sense of neighbourliness/community and good levels of street activity and observation.

This work led to the creation of Edinburgh Street Design Guide: Detailed Design Manual Factsheet P09 – Women's Safety. This factsheet sets out a series of principles to follow to enhance the perception of safety for women and girls in street design, including layout and legibility, usability and comfort and eyes on the street.

The City of Edinburgh Council established a Feminist City Short Life Cross-Party Working Group to ensure gender equity is central to land use planning and the management and design of public spaces. The most recent report on this was presented to Planning Committee on 28 January 2026. It considered the steps taken to ensure that women's safety is a key consideration for this. Design considerations must also include the need to ensure gender equality in the layout of public spaces, e.g. design of recreation and play space for women and girls as well as traditional sports pitches and play equipment, design of social spaces for use by women and girls and design for movement to be inclusive by mode and space.

Secured by Design is an initiative by the UK Police service that utilises techniques known as Crime Prevention Through Environmental Design (CPTED) to improve the safety of places. They have prepared Design Guides to cover residential and commercial development, as well as schools, hospitals, self-build, tram stops and specialist and supported housing. These guides are used to inform planning decisions around public safety. This includes informing the feedback from Police Scotland to the Edinburgh Urban Design Panel. They are also reflected in non-statutory supplementary guidance, such as the Edinburgh Design Guidance.

The Edinburgh Design Guidance includes a section on designing 'Healthy, Safe and Welcoming Environments'. This includes guidance on designing for safety, including the safety of women and girls, designing for suicide prevention and creating accessible and inclusive homes and public spaces.

Public Health Scotland and the Improvement Service published Place and wellbeing: integrating land use planning and public health in Scotland in March 2024. This highlighted the role of placemaking to deliver national priorities in health and inspire people to collectively reimagine and reinvent public spaces at the heart of communities. It also emphasises the importance of place-based working in addressing the underlying causes of inequalities and disadvantage.

The Improvement Service also published Integrating land use planning and child poverty in March 2026, with input from the Heads of Planning Scotland, the Child Poverty Peer Support Network and various local authorities. This highlighted the role of placemaking in child poverty by shaping places that enhance access to

employment and support affordable living. Placemaking and design measures that can reduce child poverty include:

- promoting mixed-use development to bring jobs closer to homes and reduce travel costs
- co-locating job hubs alongside support services or training centres
- aligning planning with anti-poverty measures and local employability strategies
- promoting child-friendly public spaces and inclusive play provision
- promoting flexible spaces within housing developments for outreach services, pop up benefits advice or community support.

A Connected Scotland: our strategy for tackling social isolation and loneliness and building stronger social connections was published by the Scottish Government in December 2018. It emphasised the role that placemaking plays in enabling people to have positive social interactions and tackle social isolation. Emphasis was placed on the importance of housing design and delivery on the level of social isolation on older and disabled people. Housing for older and disabled people is covered in Topic 12 Housing land and Topic 13 Specialist and other accommodation. The strategy also emphasised the role of local communities in planning decisions, and the use of tools such as the Place Standard.

Pleasant

This quality relates to supporting attractive natural and built spaces. Evidence on access to good variety and quality of open spaces, including play and recreation spaces is covered in Topic 6 Green blue infrastructure, open space and recreation. The evidence not covered elsewhere is as follows:

The Edinburgh Design Guidance includes sections on protecting daylight, sunlight, privacy and outlook, minimising public exposure to poor air quality, noise, odour and light pollution, and contaminated land and providing adequate storage for recycling and waste.

The Guidance for Householders provides non-statutory guidance for householder developments. It was approved by Planning Committee for adoption on 10 September 2025. It includes guidance on protecting daylight, sunlight, privacy and outlook.

Connected

This quality relates to supporting well connected networks that make moving around easy and reduce car dependency. Evidence on transport infrastructure, including active travel, public transport and shared transport is covered in Topic 1a Infrastructure - transport. The evidence not covered elsewhere is as follows:

Edinburgh’s City Mobility Plan was approved by Transport and Environment Committee in February 2024. The plan sets out the Council’s strategic approach to sustainable, safe and effective movement of people and goods. The plan recognises

that the more that people choose walking, wheeling and cycling the better the environment and the safer the streets. The plan includes Place policies related to the transformation of the city centre through reduced traffic, support for dense mixed-use development, creating liveable places and streets for people and managing servicing in new developments so that street design is not compromised. There is also a policy on creating 20-minute neighbourhoods - this is covered in Topic 15 Local living, including considerations of inclusive design for movement.

The Scottish government published Designing Streets in March 2010. This policy statement set out that local authorities should prepare guidance on street design. It set out that the emphasis of this guidance should be on place-making and meet the Six Qualities of Successful Places. Following on from this recommendation the Council prepared a Detailed Street Design Manual made up of Edinburgh Street Design Guidance factsheets. These set out the Council's expected standards for the design of street layouts, footway materials, street furniture and pedestrian, cycle and public transport infrastructure. The first of these was prepared in 2017 and these factsheets continue to be reviewed, with factsheets updated and new factsheets prepared as and when a need is identified.

Transport for Scotland published Cycling by Design in August 2020, which was updated in March 2026. This document provides detailed guidance on designing permanent cycling infrastructure to ensure that cycling is a practical and attractive choice for the everyday and occasional journeys of all people

The Edinburgh Design Guidance provides guidance on developing a comprehensive approach to achieve a well-designed, cohesive network of streets, open space and green blue network. It provides guidance on prioritising sustainable transport and local living in new development, designing streets and paths to support sustainable transport and a safe, accessible and pleasant public realm, and ensuring the design and integration of parking that is not detrimental to the delivery of sustainable transport.

Distinctive

This quality relates to supporting attention to detail of local architectural styles and natural landscapes to be interpreted into designs to reinforce identity. The built and natural heritage assets of an area contribute to its distinctive character and the evidence on this is covered in Topic 10 Historic assets and places. The different uses present within the city are also important to the distinctive character and the evidence on this is covered in Topic 18 Economy, business and industry, Topic 19 City, town, local and commercial centres and Topic 20 Tourism, culture and creativity. The evidence not covered elsewhere is set out as follows:

The Edinburgh Design Guidance provides guidance on responding to the unique character and appearance of an area's context and place, incorporating and enhancing existing features and considering the visual impact of a development on its surroundings. The built and natural environment of Edinburgh work together to

create a strong sense of place. This includes the setting of the city between the open hills and the Firth of Forth, and the impact of volcanic hills and ridges, which provide vantage points as well as often being topped with distinctive landmarks.

To protect this aspect of the city's character, the Council commissioned Colvin and Moggridge Landscape Architects to undertake a Skyline Study. This was completed in October 2010. The skyline study identifies the city's most striking visual features and views to them from public vantage points. It also introduces the concept of 'sky space', which is space around the city's landmark features that protects their integrity. The study also sets out a methodology for assessing the impact of proposed development on these key views of landmark features and the sky space around them. Topic 2 - Natural Places sets out how the Council's Local Landscape Character Assessment can be used to inform how the siting and design of development can respond to the city's natural landscapes to reinforce identity.

The Edinburgh Design Guidance also provides guidance on designing distinctive places by proposing density that is sensitive to immediate and wider context, positioning buildings on site to respond to surrounding townscape character and local heritage and landmark features and matching the general height, form, scale and proportions of surrounding buildings unless there is a compelling design-led reason for the difference. Tall buildings are required to be tall, slender, elegant objects which, when viewed against the topography of Edinburgh enhance the character of the city. There is also guidance on appropriate material choice, balancing a response to context with sustainability considerations.

As of October 2025, there were 4,938 statutorily designated heritage assets in the City of Edinburgh Council area. These heritage assets are important to the distinctive quality of the city. The Listed Buildings and Conservation Areas guidance provides non-statutory guidance for work to a listed building, within the grounds of a listed building, or development within a conservation area. This includes guidance on balancing heritage considerations around the creation of accessible, inclusive environments. Following the adoption of National Planning Framework 4 by the Scottish Government in February 2023 and City Plan 2030 by the City of Edinburgh Council in November 2024, the Listed Buildings and Conservation Areas guidance was updated. The updated draft was consulting on publicly from 9 January to 4 April 2025. The draft was finalised in response to this consultation and approved by Planning Committee for adoption on 10 September 2025. More information on this evidence is covered in Topic 10 Historic assets and places.

The Edinburgh Design Guidance also provides guidance on the incorporation of public art to make a positive contribution to setting. This reinforces the Council's Public Art Policy, which was approved by Culture and Communities Committee in February 2025.

The distinctiveness of specific neighbourhoods and local areas within Edinburgh is also important, and this will be an aspect considered within the Place Profiles. It is

important to ensure that future design related planning policies respond and reflect the city's distinctiveness and there may be a requirement in Proposed Plan for specific design policies for Edinburgh's context.

Sustainable

This quality relates to supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience and integrating nature positive biodiversity solutions. Evidence on these topics is covered in Topic 2 Natural places, Topic 4 Water management, flood risk and coastal change, Topic 5 Biodiversity, Topic 6 Green blue infrastructure, open space and recreation, Topic 7 Zero waste, energy, heating and cooling, Topic 08 and 09 Climate change and climate mitigation and Topic 15 Local living.

The Edinburgh Design Guidance provides guidance on designing development to take a whole-life emissions approach, reduce operational emissions, utilise sustainable heating, respond to a changing climate, reinforce surrounding green blue networks and conserve, restore and enhance biodiversity and tree canopy cover and enable people to live locally.

Adaptable

This quality relates to supporting a commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can meet the changing needs and accommodate different uses over time.

The Edinburgh Design Guidance provides guidance on designing the maximise the physical lifespan of a building by making sure it can be adapted to the future needs of different occupiers and that the design allows for effective maintenance and repair.

In December 2021, the Scottish Futures Trust published the Place Guide: A process for improved Place-based decision making. This guidance set out an approach to help partners work locally and collaborate to align existing and future resources for maximum benefit by using place as a framework for investment. This included the importance of preparing place briefs and place diagrams to communicate the shared long-term aspirations for a place.

Place-Based Approach

The Evidence Report will need an understanding of how local places are experienced in the context of wider data about socio-economic and environmental characteristics. This will require a place-based approach which identifies the links between design, quality and place.

City Plan 2030 includes 36 place-based policies that provide additional information on what development will be permitted or encouraged in a specific area, and the requirements in principle that any development should follow. This includes information on what uses will be appropriate, key place-specific sensitivities that development should respond to and necessary transport, education and healthcare infrastructure improvements. Some of the place-based policies set out requirements

for place briefs and masterplans to ensure a coordinated approach to development in that area. This has supported coordinated development and implementation of detailed masterplans and development frameworks for key parts of Edinburgh, including Princes Street and Waverley Valley, Fountainbridge, Granton and West Edinburgh.

Information on the design quality and placemaking of the city centre, town centres, local centres and commercial centres is included in Topic 19 City, town, local and commercial centres.

Place Profiles

Place Profiles have been prepared for each of the wards in the Council area and form part of the Evidence Report. They provide detailed evidence and assessment on the extent to which the different parts of the city meet the Six Qualities of Successful Places.

Local Place Plans

Local Place Plans are a new type of plan introduced by the Planning (Scotland) Act 2019. Planning circular 1/2022: Local Place Plans provides guidance to communities and planning authorities on the preparation, submission and registration of Local Place Plans. Local Place Plans allow community bodies to set out their own proposals for the development or use of land within their area and will inform the development of a place-based approach. They effectively empower communities to play a proactive role in the defining the future of their place as Local Place Plans must be taken into account in the preparation of the plan. The Council has a register of Local Place Plans.

Place briefs, development briefs, frameworks and masterplans

The following areas also have place briefs, development briefs, frameworks or masterplans prepared. These include detailed information about the context, characteristics, connectivity and likely future change of the area. They vary in age but remain valid especially where development has not happened or is not complete and may be updated through future Place Policies developed via the Proposed Plan.

Development briefs:

- Astley Ainslie (approved February 2002)
- Cramond Place (approved May 2008)
- Fountainbridge (approved May 2008)
- King's Stables/West Port (approved May 2010)
- Picardy Place (approved August 2009)
- Port Edgar (approved September 2008)
- Princes Street Blocks 1 – 7a (approved May 2009)
- Princes Street Block 10 (approved May 2008)
- Salamander Street (approved April 2007)
- St Margaret’s House (approved August 2009)

- West Tollcross (approved January 2006)

Development Frameworks:

- City Centre (approved October 2007)
- Granton Waterfront (approved February 2020)
- Kings Buildings (approved February 2010)
- Leith Docks (approved February 2007)

Design Code:

- Edinburgh Waterfront Promenade (approved May 2008)

Place Briefs:

- Granton National Collections Facility (approved May 2016)
- Leith Walk/Halmyre Street (approved September 2020)
- Powderhall (approved September 2018)
- Western General Hospital (approved May 2019)

Urban Design Framework:

- Craigmillar (approved August 2013)
- Haymarket (approved February 2010)
- West Edinburgh Placemaking Framework (approved November 2024)

The following place briefs, development briefs, frameworks or masterplans are also underway:

- Princes Street and Waverley Valley Strategy – This strategy includes a place brief for Waverley Station, a public realm framework, an improvement plan for Princes Street Gardens and planning guidance to promote and shape new development on Princes Street. When approved the strategy will replace the City Centre Development Framework and Princes Street Blocks 1 – 7a Development Brief. The draft strategy was approved for public consultation by Planning Committee on 11 September 2024, Transport and Environment Committee on 12 September 2024 and Culture and Communities Committee on 3 October 2024. The public consultation took place from 19 November 2024 to 21 February 2025. The draft was finalised following the public consultation and submitted to Planning Committee on 12 November 2025, however the Committee voted to continue to develop the strategy further to allow a more ambitious proposal to emerge.
- Seafield – A draft place brief and masterplan have been prepared for this area of Edinburgh. These were developed by the Council with support from architects 7N in response to public engagement that took place from April to June 2023 and from June to August 2024. The draft Seafield Place Brief and Seafield Masterplan were approved for public consultation by Planning Committee on 11 September 2024. The public consultation took place from 5 February to 30 April 2025. SEPA identified the need for a detailed wave overtopping study to inform the final masterplan, which is underway. Once this

study is complete the draft Seafield Place Brief and Seafield Masterplan will be finalised in response to the study and the views shared in the public consultation.

Summary of stakeholder engagement

Key Agency	**NHS Lothian**
Main views raised	• **Draft Topic Papers (Nov 2025):** Supportive of the alignment with the Place Principle and associated tools, the consideration of the safety of women and girls and the recognition of placemaking in tackling social isolation. Secured by Design guidance should be used sympathetically to ensure it supports connected socially supportive areas. The topic paper should be stronger in highlighting the role of placemaking in addressing inequalities. • **Final Topic Papers (March 2026):** Content with incorporation of comments. In general, agreement that there is sufficient evidence.
Council response and implications for the proposed plan	The topic paper has been adjusted to reflect the comments raised by NHS Lothian on the draft topic paper.
Is the agency content with the evidence?	NHS Lothian does not dispute any of the evidence set out in the topic paper.
Areas of agreement	• The alignment of the topic paper with the Place Principle and associated key considerations and characteristics that includes health, connectedness, sustainability, and adaptability. • The role of place-making in supporting safety, inclusion and accessibility and addressing social isolation and inequalities. Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including NHS Lothian in preparing the Proposed Plan.

Key Stakeholder	**Homes for Scotland**

Main views raised	• **Scoping (May 2025):** Suggested the inclusion of a number of government publications which form part of the evidence base • **Final Topic Papers (March 2026):** Design requirements need to be understood in the context of the national and local Housing Emergencies, which may require more flexibility. Viability must be a consideration for all policies. Agree with allocating sites well served by services and amenities, but this should not be at the expense of placemaking or viability.
Council response and implications for the proposed plan	The suggested list of publications shared at the Scoping stage have been reviewed. Many of the suggestions have been included as part of the evidence base. Some publications were noted but not considered relevant at evidence stage due to level of detail. The issue of deliverability considerations has been addressed in the Topic 12 Housing land. The issue of access to services and amenities has been addressed in Topic 15 Local living.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	• The delivery of high-quality places that are attractive places to live • The allocation of sites within areas well served by services and amenities, while also considering placemaking principles and viability factors. • A balanced approach to allocating sites is required. Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The deliverability of sites allocated for housing and associated design policies will be considered at Proposed Plan stage.

Other engagement and matters raised

Network Rail - Network Rail's Principle of Good Design should be explored as part of the evidence base. This is noted but not considered relevant at evidence stage due to level of detail.

The University of Edinburgh – The design of Purpose-Built Student Accommodation must create safe and pleasant places and provide suitable amenity

space and communal facilities. This has already been explored through the work on the Edinburgh Design Guidance. The University of Edinburgh also commented that the University locations should be considered for Place designations to support the uniqueness of the University estate. Place designations will be explored at a later stage.

Other: Internal discussions took place with other Council teams including Housing & Regeneration, Transport, Strategy & Partnerships, Flood Prevention, Environmental Protection, Climate Change, Equally Safe Edinburgh and Waste Management. They are content with the evidence report.

Summary of implications for the Proposed Plan

In preparing the Proposed Plan, design quality and placemaking will be a cross-cutting theme with a need for the plan to be place-based, in line with the Place Principle and six qualities of successful places.

The key implications for the Proposed Plan are:

- Consider the role of place in the development of the plan's spatial strategy, which can include identifying place qualities that contribute to the distinctiveness of specific neighbourhoods and local areas within Edinburgh as identified in the Place Profiles
- To utilise tools such as place policies to set development and design principles and mapping for specific areas and ensure a coordinated approach to development, which may include the consideration and incorporation of existing place briefs, development briefs, frameworks or masterplans, where relevant
- Consider how the plan's spatial strategy, proposals and policy can protect the unique character and setting of Edinburgh. This includes the city's location between the open hills and the Firth of Forth. It also includes the skyline and distinctive visual features, as well as the impact of volcanic hills and ridges, which contribute to this distinctiveness and provide vantage points for key views.
- To consider the need for any locally specific policies to address key design considerations for Edinburgh.

Statements of agreement / dispute

With regards the Evidence Report, NHS Lothian Public Health Team are pleased to see the extent to which their comments and suggestions have been considered and incorporated. They are in general agreement that there is sufficient evidence provided across the topic papers to effectively support the development of the Local Development Plan.

Homes for Scotland agree on the importance of the creation of high-quality places that are attractive place to live. Home for Scotland also do not disagree with the

notion of allocating sites within areas well served by services and amenities. This should not be at the expense of placemaking principles, nor viability factors.

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

12: Housing land

Topic	**12: Housing land**
Description of topic	Sets out information on housing need and demand including affordable housing, housing land supply, factors to be considered in setting an indicative housing land requirement and site appraisal methodology.
Information required by the Act	**Town and Country Planning (Scotland) (Act) 1997, as amended:** 15(1A) The LDP must include 'targets for meeting the housing needs of the people living in the part of the district to which it relates. Section 15(5) Section 15(5) • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district • the housing needs of the population of the area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people; and • the availability of land in the district for housing, including for older people and disabled people • the extent to which there are rural areas within the district in relation to which there has been a substantial decline in population. Section 16(2) (ab) • in preparing the LDP the planning authority are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for self-build housing. **Town and Country Planning (Development Planning) (Scotland) Regulations 2023:** Regulation 9 Have regard to: • any local housing strategy.

	Regulation 24 • a Delivery Programme is to set out the following matters: the expected sequencing of, and timescales for, delivery of housing on sites allocated by the LDP.
Relevant NPF4 Policies	• Policy 9 Brownfield, vacant and derelict land and empty buildings • Policy 16 Quality homes • Policy 17 Rural homes • Policy 18 Infrastructure first
Local Development Plan Guidance	Evidence Reports are expected to include: a section on housing, an indicative Local Housing Land Requirement (LHLR), a transparent and an understandable explanation of how the indicative LHLR has been arrived at. Planning authorities may wish to consider the following information when proposing an indicative LHLR: • MATHLR The same evidence can be used by the planning authority to inform their indicative LHLR as that used to inform the MATHLR. However, where more recent information is available this should be used. • HNDA Where the Scottish Government (Centre for Housing Market Analysis) is satisfied that the HNDA is robust and credible, the approach used will not normally need to be considered further at the Gate Check. Regard must be had to the Local Housing Strategy (LHS) and this should inform the process of setting the all-tenure LHLR. The Evidence Report should also be informed by the following planning and, housing information: • Housing Land Audits • The list of persons seeking to acquire land for self-build housing • A windfall assumption • The most recent Strategic Housing Investment Plan (SHIP). And may wish to take account of: The proportion of ineffective stock relating to second homes, vacant properties and housing used for short-term letting (holiday accommodation) within their area. LDPs should provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive

	in identifying opportunities to support residential development. Authority could usefully establish a site appraisal methodology that will be used to appraise sites and inform allocations for the Proposed Plan. Local Development Plans should set out tailored approaches to rural housing and where relevant include proposals for future population growth – including provision for small-scale housing such as crofts and woodland crofts and the appropriate resettlement of previously inhabited areas.
Linked Topic Papers	• Topic 01a Infrastructure – transport • Topic 01b Infrastructure - education • Topic 01c Infrastructure - health and social care • Topic 01d Infrastructure - energy and digital infrastructure • Topic 01e Infrastructure - water and waste water • Topic 02 Natural places • Topic 03 Green belt, countryside and rural • Topic 04 Water management, flood risk and coastal development • Topic 06 Green blue infrastructure, open space and recreation • Topic 13 Specialist and other accommodation • Topic 19 City, town, local and commercial centres
List of and links to evidence	• **CD117** A Scotland for the Future, Scottish Government, March 2021 • **CD636** Affordable Housing Need in Scotland Post 2026, Scottish Federation of Housing Associations (SFHA), September 2025 • **CD119** Affordable Housing Supply Programme, Scottish Government, 2025 • **CD520** The Barriers to Housing Delivery, Homes for Scotland, April 2024 • **CD496** Buildings at Risk Register (BARR), Historic Environment Scotland • **CD064** City Plan 2030 Housing Study, City of Edinburgh Council, January 2020 • **CD356** Scottish Government NPF4 Housing Land Figures – City of Edinburgh Response, City of Edinburgh Council May 2021 • **CD088** Business Plan 2023-2027, City of Edinburgh Council, March 2023 • **CD152** Housing Statistics: Conversions and Demolitions, Scottish Housing Statistics, Scottish Government, May 2025

- **CD282** Designation of Short-Term Let Control Area for Edinburgh Statement of Reasons Background Report, City of Edinburgh Council February 2022
- **CD133** DPEA Further Information Request (Household Projections 2022), Scottish Government, March 2026
- **CD136** Draft NPF4 Housing land requirement explanatory report, Scottish Government, November 2021
- **CD109** Edinburgh and South East Scotland Housing Need and Demand Assessment 3, SES authorities, July 2022
- **CD346** Regional Housing Programme Annual Update, City of Edinburgh Council September 2025
- **CD666** Edinburgh Partnership Community Plan 2022 – 2028, The Edinburgh Partnership
- **CD306** Empty Homes Strategy and Annual Report, City of Edinburgh Council, February 2026
- **CD434** Existing Housing Need in Scotland, Diffley Partnership and Rettie & Co Scotland research for Homes for Scotland, January 2024
- **CD683** HEAP Estimates Technical Appendix, UK Collaborative Centre for Housing Evidence/Indigo House (CACHE)/Centre for Homelessness Impact, June 2026
- **CD138** Empty Properties and Second Homes, Scottish Government, September 2025
- **CD516** Homes for Scotland Site Assessment Methodology, Homes for Scotland
- **CD515** Homes for Scotland Site Assessment Matrix, Homes for Scotland
- **CD517** Homes for Scotland Site Deliverability Checklist, Homes for Scotland
- **CD559** Household Projections for Scotland 2018-based, NRS, September 2020
- **CD561** Household Projections for Scotland, 2018-based - Detailed Tables Principal Projection (Table 6), NRS, September 2020
- **CD560** Household Projections for Scotland, 2018-based - Detailed Tables High Migration Variant (Table 6), NRS, September 2020
- **CD555** Household Projections for Scotland (2022-based), NRS, December 2025
- **CD558** Household Projections for Scotland, (2022-based) Detailed Tables By Council Principal (City of Edinburgh), NRS, December 2025
- **CD557** Household Projections for Scotland, (2022-based) Detailed Tables By Council High Migration (City of Edinburgh), NRS, December 2025
- **CD316** Housing Emergency Action Plan 2024-2029, City of Edinburgh Council, March 2024

- **CD315** Housing Emergency Action Plan - Update, City of Edinburgh Council, June 2025
- **CD314** Housing Emergency Action Plan – Biannual Update, City of Edinburgh Council, February 2026
- **CD317** Housing Emergency Declaration, City of Edinburgh Council, November 2023
- **CD318** Housing Land Audit 2025, 2024 and 2023 (Committee Report and Appendices), City of Edinburgh Council, November 2025
- **CD150** Housing Land Audit Guidance, Scottish Government, January 2025
- **CD151** Housing Need and Demand Assessment (HNDA): practitioner's guide 2020, Scottish Government, November 2025
- **CD154** Housing to 2040: strategy and supporting documents, Scottish Government, March 2021
- **CD529** Guidance on Key Agency Engagement with Local Development Plan Site Appraisals, Key Agencies, March 2025
- **CD619** Key Agencies Local Development Plan Site Assessment and SEA Checklist, Scottish Environment Protection Agency (SEPA), February 2024
- **CD160** Letter to Chief Planning Officers from Chief Reporter, Scottish Government, March 2026
- **CD162** Local Development Plans: Evidence Reports and Gate Checks Action Plan and Advice, Scottish Government, February 2026
- **CD161** Local Development Planning Guidance, Scottish Government, May 2023
- **CD300** Edinburgh's Local Housing Strategy 2025-30, City of Edinburgh Council, June 2025
- **CD428** Housebuilding Market Study, Competition & Markets Authority (CMA), February 2024
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023
- **CD170** National Planning Framework 4 Housing Land Requirement Explanatory Report Addendum, Scottish Government, November 2022
- **CD169** National Planning Framework 4 (NPF4) Housing Land Figures Method Paper, Scottish Government, February 2021
- **CD179** Planning and the Housing Emergency – Delivery Plan, Scottish Government, November 2024
- **CD185** Programme for Government 2025-26, Scottish Government, May 2025
- **CD547** Economic Impact of Residential and Short-Term Let Properties in Edinburgh (with Committee Report), MK Economics, May 2023

- **CD519** Scotland's SME Home Builders 2024: Data Review and Industry Insights, Homes for Scotland, June 2024
- **CD518** Scotland's SME Home Builders in 2025, Homes for Scotland, June 2025
- **CD212** Scottish Housing Market Review Q3 2025, Scottish Government, October 2025
- **CD357** Self-Build Housing Land Register, City of Edinburgh Council
- **CD358** Short Term Let Public Register, City of Edinburgh Council, October 2025
- **CD363** Strategic Housing Investment Plan (SHIP) 2026-31, City of Edinburgh Council, November 2025
- **CD365** Strategy for purchasing land and homes to meet affordable housing need, City of Edinburgh Council, December 2024
- **CD222** Tackling Scotland's Housing Emergency, Housing Emergency Action Plan, Scottish Government, September 2025
- **CD207** Scottish Government Urban Rural Classification 2022, Scottish Government, December 2024
- **CD215** Scottish Vacant and Derelict Land Survey (2024), Scottish Government, September 2025

List of matters covered

This topic paper sets out the evidence relevant to the consideration of housing land. It considers the policy context, sets out information on affordable housing in Edinburgh and how this is addressed, considers a range of factors relevant to delivery and land for housing and provides information on the latest Housing Need and Demand Assessment and updated Household Projections. This context then provides a basis for establishing the indicative Local Housing Land Requirement.

The topic paper considers the following:

- National, regional and local policy context
- Affordable Housing and Council housing service plans and strategies
- Housing Need and Demand Assessment
- Housing land supply
- Establishing an indicative Local Housing Land Requirement
- Site appraisal methodology.

Matters relating to specialist and other accommodations are addressed in Topic 13 Specialist and other accommodation.

Matters relating to housing needs of those in further and higher education are addressed in Topic 14 Student accommodation.

The Place Profiles examine housing on a ward basis and includes engagement findings on what people think about their homes and the needs of other within their area.

Summary of Evidence

National

NPF4

NPF4 aims to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland. Policy 16 Quality homes states that Local Development Plans (LDPs) are expected to identify a Local Housing Land Requirement for the area they cover. This is to meet the duty for a housing target and to represent how much land is required.

NPF4 also states that the Local Housing Land Requirement is expected to exceed the 10-year Minimum All-Tenure Housing Land Requirement (MATHLR), set out in Annex E of the Framework. Annex E sets out a ten-year MATHLR for Edinburgh of 36,750.

Deliverable land should be allocated to meet the 10-year Local Housing Land Requirement (LHLR) in locations that create quality places for people to live. Areas that may be suitable for new homes beyond 10 years are also to be identified. The location of where new homes are allocated should be consistent with local living including, where relevant, 20 minute neighbourhoods and an infrastructure first approach. Diverse needs and delivery models should be taken into account across all areas.

Housing to 2040

Scotland's long-term national housing strategy: Housing to 2040 was published by the Scottish Government in March 2021. It sets out a vision for housing and route map to get there by 2040. It seeks to support people to live in the homes they want to live in which are affordable and meet their needs. It sets an ambition to deliver 100,000 affordable homes over the ten years to 2030/31 with the aim that at least 70% of those homes will be for social rent. It supports a place-based approach, 20 minute neighbourhoods, town centre living, and a brownfield first approach.

A Scotland for the future: opportunities and challenges of Scotland's changing population

Scotland's first national population strategy, produced in March 2021, sets out demographic challenges that Scotland faces at national and local level and sets out a programme of work to address these challenges and harness new opportunities.

The Scottish Government's aim is to make communities across Scotland attractive places to live, work, bring up families and to move to; so that Scotland's population

profile provides a platform for sustainable and inclusive economic growth and wellbeing.

The strategy sets out a number of actions including taking a place-based approach to demography and attracting people and businesses to Scotland.

The strategy acknowledges that population change is important at a local level as well as a national level. It recognises that planning future development can be challenging in areas where demand is high and infrastructure is constrained.

Programme for Government 2025/26

Increasing the supply of affordable homes is a national priority. The Scottish Government's 'Programme for Government 2025-26' sets out ambitions to 'deliver 110,000 affordable homes, nationally, by 2032.' The document states these will 'include homes for social rent, mid-market rent and low-cost home ownership, with a focus on acquisitions and family sized homes.' Increased investment and implementing the recommendations of the Housing Improvement Task Force, which set out actions in June 2025 to unlock existing and new commitments to investment in housing across all tenures, are identified as a means to ensuring more people can access good, affordable, homes.

Affordable Housing Supply Programme

The Affordable Housing Supply Programme (AHSP) is a national Scottish Government funding programme to enable affordable housing providers to deliver homes for social rent, mid-market rent, and low-cost home ownership.

Edinburgh's 2025/26 allocation of AHSP funding increased following a 24% budget cut in 2024/25. The £45.053 million awarded this year has been supplemented by a further £28.685 million of monies allocated through the National Acquisition Programme which is ring fenced for the purchase of completed units. There is no confirmed funding beyond the current financial year. However, the draft national Affordable Housing Supply Programme was announced as part of the Draft Scottish Government Budget 2026/27. There is a proposed national £118 million increase in 2026/27 subject to parliament approving the budget. Around £35 million of this increase is proposed to be available for capital works.

It is estimated that the average construction cost of an affordable home in Edinburgh is around £254,000. The AHSP grant benchmark levels per home have increased in recent years but they have not increased in line with the rise in construction costs.

Scotland's Housing Emergency

The Scottish Government declared a national housing emergency in May 2024. In November 2024, the Scottish Government published the Planning and the Housing Emergency Delivery Plan. The plan focuses on four different action areas relating to policy, delivery, efficiency and capacity. It sets actions to identify mechanisms to accelerate build out of housing sites, support consistency in applying planning

policies, support good practice in community benefits from new housing, facilitate development through the planning system and improve its efficiency.

In September 2025, the Scottish Government published its Housing Emergency Action Plan . The plan focuses on three key areas – ending children living in unsuitable accommodation, supporting the housing needs of vulnerable groups and supporting growth and investment in the housing sector. The plan includes a new commitment to invest up to £4.9 billion over the next four years, delivering around 36,000 affordable homes by 2029-30.

The national context for housing points to the housing challenges, particularly in relation to affordable, that are seeking to be addressed at a national level. NPF4 and the national housing strategy further emphasise the importance of place and sustainable development as part of this.

Regional and Local Policy Context

City Region Regional Housing Programme

The Edinburgh and South East Scotland City Region Deal (ESESCRD) was created in August 2018 to drive productivity and growth while reducing inequalities and deprivation within the region. The region comprises six local authorities: City of Edinburgh, East Lothian, Midlothian, West Lothian, Scottish Borders and Fife. There are five key themes in the deal including housing.

A Regional Housing Board has been established and a Regional Housing Programme developed focussing on five key priority areas for collaboration: Affordable Housing Delivery; Retrofit; Strategic Sites Programme; Regional Delivery Alliance; and Innovative Funding Models and Infrastructure Delivery. The Strategic Sites programme focusses on delivery of seven strategic sites including Edinburgh's Waterfront.

Council Business Plan 2023-27

The Council Business Plan strategic objectives are to create good places to live, end poverty and deliver a net zero city by 2030. The plan identifies ten outcomes to deliver the objectives including that people have decent, energy efficient, climate proofed homes they can afford to live in. The plan sets out to increase the supply of affordable housing with an ambition to reach 25,000 new affordable homes.

Edinburgh Partnership Community Plan 2022-2028

The Community Plan which is the Council's Local Outcomes Improvement Plan (LOIP) sets out a vision of Edinburgh as a thriving, connected, inspired and fair city, where all forms of poverty and inequality are reduced. It sets out three priority workstreams:

- enough money to live on
- access to work, learning and training opportunities
- a good place to live.

A good place to live recognises that the places people live and work, the connections with others and the extent to which they can influence the decisions that affect them, all have a significant impact on their quality of life and wellbeing. It articulates additional actions to ensure residents can access an affordable, well designed, safe and inclusive place to live:

- maximise the land to deliver affordable homes
- maximise the value and outcomes from Edinburgh's public-sector estate and deliver opportunities for accelerated investment through strategic partnership and review of public sector assets
- identify more, and strengthen opportunities to work in partnership, as public sector bodies and with communities and the private sector, to create good places to live. Including seeking new placemaking approaches to support the delivery of accessible and open places, with good links to health, childcare, and other services.

Affordable Housing and Council Housing Service Plans and Strategies

The key local policy documents are the Local Housing Strategy and Strategic Housing Investment Plan which set out the policy, strategic context and approach to delivery. These are supplemented by a range of action plans, decisions and projects which are also listed here as they provide important context to how Edinburgh is tackling specific housing issues and in particular the need for more affordable homes, including Edinburgh's declared housing emergency.

Edinburgh's Housing Emergency

On 2nd November 2023, the City of Edinburgh Council declared a housing emergency, citing significant pressures to the city's housing market, including homelessness rates, a shortage of social rented homes and high rental inflation in the private rented sector. Noting at the time: "there are around 7,000 households in Edinburgh without a permanent home, with around 5,000 households residing in temporary accommodation" (Housing Emergency Declaration, City of Edinburgh Council, 2 November 2023 and Minutes City of Edinburgh Council, November 2023).

A draft Housing Emergency Action Plan was prepared in March 2024 and updated in June 2025 and February 2026. The Action Plan aims to improve the quality and access to existing and new affordable housing.

Its strategic objectives include working with partners to develop and implement innovative funding solutions, which includes supporting the development of mid-market rent and investigating other innovative rent models for the private rented sector to tackle the Housing Emergency; be responsive to the housing market by being flexible and dynamic in the approach to tackling the housing emergency;

working with partners to develop new delivery models and working with partners to plan for future housing needs. Actions include:

- working with Glasgow University (with UK Collaborative Centre for Housing Evidence (CaCHE) and Centre for Homelessness Impact) and Indigo House consultancy to produce an updated housing needs analysis that will help to identify priority need for the city, including data on property size (the 'Best Value Review')
- seeking land opportunities for direct development and partner with landowners on strategic sites
- working proactively with the public sector to secure and develop sites and review the use of statutory consents to release land for house building
- working with private and public sector partners to explore solutions to barriers that prevent housing development and supply
- bringing more empty private homes back into use and explore 'flipping' building use, such as temporary accommodation to settled accommodation, alongside converting other building types into housing.

The next update on the Housing Emergency Action Report is expected to be presented to the Council's Housing, Homelessness and Fair Work Committee in August 2026.

Best Value Review of the Housing Emergency Action Plan and Homelessness Service

Work was commissioned by the Council's housing service in 2025 as part of the Housing Emergency Action Plan. A research team consisting of the UK Collaborative Centre for Housing Evidence (CaCHE) (through Glasgow University), Centre for Homelessness Impact and Indigo House consultancy have prepared a Best Value Review of the homelessness service and Housing Emergency Action Plan. This includes a technical appendix which provides an estimate of existing housing need and details the results of the analysis undertaken to examine the number, size and tenure of the homes required to accommodate the Edinburgh's growing population, including any specialist requirements. It provides revised estimates for all housing tenures and the land requirement for housing over the next 5, 10 and 15 years using the latest available population and household projections together with other supporting data.

The Best Value Review of the Housing Emergency Action Plan and Homelessness and its Technical Appendix will be presented to the City of Edinburgh Council's Housing, Homelessness and Fair Work Committee in Summer 2026. The study and revised estimate of existing housing need supports the Council's Local Housing Strategy and future affordable housing planning.

Council Budget 2026/27, City of Edinburgh Council, February 2026

In February 2026, the City of Edinburgh Council approved measures within the Council Budget to facilitate enhanced investment of £1.6 billion over the next five years to tackle the housing emergency. This includes provision of 2,500 homes for temporary accommodation, funding to unlock around 1,100 settled homes at affordable rents and investment capacity for up to around 2,300 additional settled homes.

The details of actions to support this decision are expected to emerge over the second half of 2026, including information on sites. The planning service and housing are continuing to work together to ensure a joined up approach with the existing LDP and future Proposed Plan.

The decision provides the Council with the ability to address a significant portion of the identified affordable need in Edinburgh. It further enables the Council to stimulate the wider development of sites through provision of upfront funding based on sites within the Council's SHIP .

This recent decision will be supported by additional reports to Council specifying sites and proposals. These decisions are expected to be reported in the coming months in 2026 allowing more precise figures and decisions on sites to be taken account of in preparing the Proposed Plan over 2026 and 2027.

Local Housing Strategy 2025-2030

The Local Housing Strategy (LHS) approved in June 2025, sets out the strategic approach to the delivery of housing and housing related services in Edinburgh, across all housing tenures. It was prepared by the Council's housing service with input from the planning service. Consultation and engagement were integral to the development of the strategy. The LHS has been informed by three phases of consultation and engagement over the period from May 2024 to April 2025, engaging over 1,000 people. The LHS was approved by the Council's Housing, Homelessness and Fair Work Committee on 13 June 2025.

The overarching strategic vision for the LHS is:

- everyone in Edinburgh can access and live in a home that is warm, safe, high quality, meets their needs and that they can afford
- everyone can access the right support, at the right time to allow them to be part of a thriving community
- the vision is underpinned by 12 strategic objectives including delivering a supply of homes across affordable tenure types to meet demand and ensuring households living in privately rented homes have access to affordable, well managed and high-quality housing with security of tenure

The LHS recognises that the biggest challenges relate to affordable housing supply in Edinburgh. It notes that Edinburgh's tenure mix differs from the rest of Scotland,

particularly in relation to social housing which makes up only 16% of households, lower than most major cities in the UK and lower than the national average of 22% (Census 2022).

It identifies key challenges around the provision of affordable housing:

- demand for affordable housing outstrips supply
- high construction costs, with large increases in costs over the past five years
- high borrowing costs due to increased interest rates
- significant additional resources are needed to deliver affordable homes at the scale required.
- benchmark grant levels not keeping pace with the cost of development or finance
- reduction in AHSP grant funding
- uncertainty over the level of grant funding available into future years
- competing capital funding priorities for social rented housing with, for example, increased energy efficiency requirements for existing stock impacting on the number of new homes that can be developed from the same budget
- higher new build standards cost more to deliver.
- increased developer contributions through the Section 75 rules towards infrastructure costs

To address the affordable housing challenges proposed, actions include better alignment of the Council's budget, medium-term financial plan and Housing Revenue Account (HRA) in the short, medium and long-term to address this in line with the Council's Business Plan which aims to increase the supply of affordable homes and work to increase social rented homes to match the Scottish average. The LHS also recognises the role of placemaking and regeneration as part of housing aims.

The LHS points to the research work being undertaken focusing on the amount of permanent and temporary housing required to end Edinburgh's housing emergency. This work is part of the Best Value Review of the Housing Emergency Action Plan and Homelessness, and this includes a figure for addressing Edinburgh's housing need, as part of its technical appendix, which is referenced later in this paper in relation to the indicative Local Housing Land Requirement.

The LHS itself does not set out a Housing Supply Target.

The strategy is accompanied by an Action Plan. Actions relating to delivering a supply of affordable homes to meet demand are:

- work with partners to increase and improve supply of housing in the city and develop and implement innovative funding solutions
- be responsive to the housing market by being flexible and dynamic in approach to tackling the Housing Emergency

- work with partners to develop new delivery models of housing in the city
- work with partners to make best use of all homes in the city

The City of Edinburgh Council budget decision for a further £1.6billion of Council funding for new affordable homes in February 2026, was subsequent to the approval of the Local Housing Strategy in June 2025. A further update on the Local Housing Strategy will be presented at the Council's Housing Homelessness and Fair Work committee in August 2026. The updated Local Housing Strategy, including updates in relation to the Council's budget decision and HEAP will be considered in preparation of the Proposed Plan.

Strategic Housing Investment Plan (SHIP) 2026-31

The Council's Housing, Homelessness and Fair Work Committee approved the SHIP 2026-31 for submission to the Scottish Government on 25 November 2025. The SHIP sets out a potential pipeline for the delivery of new affordable homes. It identifies what could be delivered if sites in private ownership are brought forward, and sufficient public and private investment is made available.

Based on information from delivery partners, around 8,000 potential affordable housing approvals for site start and around 7,300 potential completions have been identified over the five-year period 2026-2031. These figures are lower than the five-year projection from the previous SHIP and are indicative of a continued cautious approach from partners partly due to funding uncertainty.

The SHIP is funded through a mix of AHSP grant funding from the Scottish Government, Registered Social Landlords' (RSLs') own finance, finance raised by private developers, institutional investment, developer contributions and Housing Revenue Account (HRA) funding. Around 6,250 homes set out in the SHIP require grant funding through the AHSP.

Over 1,700 may be delivered through innovative funding schemes that require lower levels of grant funding and, in some cases, no grant funding. This includes the Council's Acquisition and Disposals (A&D) programme, private sector led Build to Rent (BTR) offering tenancies at Intermediate Rent levels, Scottish Government's Open Market Shared Equity (OMSE), and other forms of low-cost home ownership.

The SHIP 2026-2031 identified a minimum requirement of £490m of AHSP grant over the next five years to deliver the identified programme. A further additional requirement of at least £211m of funding has been identified for the years following this SHIP period.

The City of Edinburgh Council budget decision for a further £1.6billion of Council funding for new affordable homes in February 2026, was subsequent to the approval of the SHIP 2026-31 in November 2025. The budget decision includes funding provision for projects identified within the SHIP 2026-2031. Funding requirements are currently being reviewed and the SHIP 2027-2032 will be submitted for approval

in late 2026. This will provide a further update on project status and funding requirements.

In 2025/26 1473 affordable homes were completed or purchased for use, exceeding the target of 1,368, while 994 homes were approved for construction. Work also started on 1,004 new homes..

Almost £74m was spent on affordable housing in the last financial year, surpassing the previous high figure of £55m spent in a single financial year since the programme was introduced in 2007.

Regional Delivery Alliance (RDA)

The RDA is a programme aligned with the Edinburgh and South East Scotland City Region Deal and is supporting the delivery of affordable housing across the region.

The predecessor to the RDA was the Edinburgh Home Demonstrator (EHD) which was a three-year programme between industry professionals, regional universities and was supported by the Scottish Government. The aim of this programme was to create a new approach to the briefing, design, procurement, and construction of affordable housing. At the end of the EHD programme there was agreement from the six regional local authorities, including The City of Edinburgh Council, to continue this valuable work through the RDA.

The RDA aims to support the delivery of affordable housing through a standardised housing product and through collaboration. A suite of house and flat typologies have been developed that comply with Housing for Varying Needs, are net-zero ready and utilise offsite manufacturing to speed up the design and construction phases of a development. Furthermore, developing the sites in ‘bundles’ may create economies of scale and encourage knowledge sharing between Local Authorities, RSL’s and the private sector.

To date, the EHD programme has resulted in 75 homes being completed in Edinburgh, and a further 189 homes are under construction. The RDA programme has supported one site in Edinburgh with a feasibility study, demonstrating its viability for 36 homes. In the wider region, the RDA programme is supporting 60 homes that are under construction and has supported 10 feasibility studies which could result in 373 homes being developed.

Edinburgh’s Strategy for purchasing land and homes to meet affordable housing need

The current delivery strategy for increasing the supply of homes was approved by The Housing, Homelessness and Fair Work Committee in December 2024 and August 2025. The strategy sets out the Council’s approach to increasing affordable housing supply by four routes; building directly, working on strategic sites with development partners, purchasing completed new build homes, and purchasing

second hand homes. The Council works directly with landowners to purchase both land and completed homes, particularly where there is an opportunity to increase the level of on-site affordable housing provision to above policy levels. It also works closely with and promotes close working with Registered Social Landlords (RSLs) to ensure a collaborative approach, rather than one of competition. The objective is to maximise delivery of affordable housing and make effective use of the funding that is available to all partners. The strategy is being reviewed by Housing, Homelessness and Fair Work Committee on 1st June 2026 but the recommendation is that the Council continues to use a number of different routes to deliver homes.

Over the past financial year, the Council increased supply by 866 through these delivery routes. The Council currently has 541 affordable homes under construction directly and over 1,300 in detailed design phase, with another 1,000 moving into this phase of development in the next few months. The overall pipeline for affordable housing remains strong across the city (5,700 at time of reporting in August 2025). Partnership working will continue to be an important factor in overall delivery.

Council House Letting Policy

In April 2025 the Council's Housing, Homelessness and Fair Work Committee agreed to suspend the Council House Letting Policy meaning that no Council properties will be advertised for let, and properties that become available for let will either be used for temporary accommodation or allocated as permanent tenancies through a direct matching process.

On 10 February 2026, The Council's Committee agreed to continue to suspend the allocations policy until the final meeting of this political term (in the first half of 2027), or earlier if significant progress is made.

Affordable Housing Supply Programme (AHSP) performance

In the period 2020/21-2024/25, the Council, Housing Associations and other partners have completed 5,412 new affordable homes (including homes for social rent, mid-market rent, intermediate rent and low-cost home ownership.

60% of the completed homes were supported with Scottish Government grant funding. The chart below shows the number of homes completed and approved from 2021/22 to 2024/25 with AHSP funding.

Figure 12.1: AHSP Grant funded homes approved and completed (source: LHS 2025-30)

The majority of affordable homes approved and completed in Edinburgh are for social rent. Over the five years 2021/22 to 2024/25, 58% of all grant funded completions and 69% of all approvals were for social rent homes. The remaining approved or completed homes were for Mid Market rent along with a small number of Low Cost-Home-Ownership homes (Shared Equity).

Almost 60% of the homes delivered through the AHSP over the over the last two years (2022/23) to 2024/25 are two-bedroom properties. One-bedroom homes form 24% and 16% consist of three bedroom homes There have also been a number of four bedrooms homes delivered as well.

Affordable Housing Policy

NPF4 supports proposals for market homes where the contribution to the provision of affordable homes on a site will be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where:

I. a higher contribution is justified by evidence of need, or
II. a lower contribution is justified, for example, by evidence of impact on viability, where proposals are small in scale, or to incentivise particular types of homes that are needed to diversify the supply, such as self-build or wheelchair accessible homes.

Currently, City Plan 2030 sets an affordable housing policy (AHP) which applies to proposals for 12 or more units which requires that 35% of the total number of units are provided as affordable housing. The Affordable Housing Policy 2025

Performance and Updated Guidance provided to the Council's Planning Committee on 12 November 2025 sets out performance information on the AHP.

In 2024/25, there were 16 applications with over 3,100 homes which were consented for development. Fifteen (94%) of the applications consented, included onsite affordable housing (886 homes).

During 2024/25 16 sites with 20 or more homes received planning consent of which 15 (96%) provided on site affordable housing.

	2023/24		2024/25	
	All Affordable	AHP Enabled	All Affordable	AHP Enabled
Approvals	668	106 (16%)	658	227 (35%)
Completions	934	417 (45%)	1135	654 (8%)

Figure 12.2: Affordable homes delivered through AHP in 2023/24 and 2024/25 (source: City of Edinburgh Council, Affordable Housing Policy 2025-Performance and Updated Guidance, 12 November 2025)

Projects delivered through the AHP are affected by market changes, as these account for the majority of RSL led projects then any delay in development has a knock-on impact on affordable units.

Housing Need and Demand Assessment

A Housing Needs and Demand Assessment (HNDA3) has been produced on behalf of the South East Scotland region comprising City of Edinburgh, East Lothian, Midlothian, Scottish Borders, West Lothian and Fife (West and Central). HNDA 3 was certified as being robust and credible by the Scottish Government's Centre for Housing Market Analysis (CHMA) on 28th July 2022.

HNDA3 provides a statistical estimate of how much additional housing would be required to meet existing and future housing need and demand in the period 2021-2040 split between market and affordable. It considers local incomes, house prices and rents to ascertain the number of households who are likely to be able to afford to buy a property or afford private rent, below market rent or social rent.

Scottish Government published HNDA Tool and Guidance (HNDA, A Practitioner's Guide) in December 2020. While there is no requirement to use the tool, the production of HNDA3 closely followed the Scottish Government recommended methodology to meet the 'HNDA Core Outputs and Processes', relying on the use of robust national and local secondary data.

HNDA3 estimates the number of households in existing need that will require a new home and how many years it will take to address that housing need. It chooses a range of demographic scenarios that best reflect what may occur across South East Scotland and considers what may happen to future local house prices, rent prices and incomes. It splits total additional housing units by tenure, highlighting key issues

in housing need and demand for Local Housing Strategies and Development Plans. A range of stakeholders were consulted and responses used to inform the development of the HNDA where relevant.

Scottish Government Local Development Planning Guidance, May 2023 sets out that 'where the Scottish Government (Centre for Housing Market Analysis, CHMA) is satisfied that the HNDA is robust and credible, the approach used will not normally need to be considered further at the Gate Check'. Where stakeholders consider further evidence may be relevant after a robust and credible HNDA has been achieved, this may be raised in engagement, reflected in the Evidence Report and it is at the discretion of the reporter to consider whether a request for further information is appropriate.

The HNDA Tool contains an approach to assessing existing need which includes a count of homeless households in temporary accommodation and households that are both overcrowded and concealed (HoTOC). HoTOC count is based on Scottish Government HL1 homelessness statistics (households in temporary accommodation) and a combination of the Scottish Household Survey (2016-18) and the 2011 Census (households both overcrowded and concealed). The resulting figures show households requiring a new-build home to meet their housing need. The default data included in the HNDA Tool 2019 estimates that housing need affects 2,140 households in Edinburgh.

The HNDA guidance allows for an assessment of existing need outwith the HNDA Tool. This should as a minimum include the elements included in HoTOC and exclude any existing need that can be dealt with using an in-situ or housing management solution. Any move away from the default approach must be evidenced and detailed within HNDA3. Edinburgh and the other South East Scotland authorities expressed concern that the HoTOC calculation underestimated the level of homelessness as:

- It assessed homelessness at 31 March 2020 prior to COVID-19 pandemic and since this time there had been a significant increase in homelessness which was projected to continue.
- The data is based on households in temporary accommodation whereas local authorities reported significant levels of statutory homeless customers arranging their own temporary housing arrangements until permanent housing could be obtained.

The Project Team was also concerned that some households' needs. Outwith the categories of homelessness and overcrowding/concealed, could only be met through the provision of new build housing. This particularly relates to specialist housing categories where there is low supply and turnover of specific housing types e.g. wheelchair, extra care, retirement housing, etc.

The Project Team agreed to develop alternatives to the default HoTOC model. Three options were considered as detailed in Appendix 5: South East Scotland HNDA3, Existing Housing Need Model. The third option 'LA & HNDA Tool Combined Existing Need' was selected as it was considered to provide the closest representation of needs, while still adhering to the HNDA guidance. This option uses a methodology based on recent data on homeless 'live' cases, households that are both overcrowded and concealed, and households that have support needs and require special forms of housing. The default data source is based on a count of households in temporary accommodation whereas all local authorities reported significant levels of statutory homelessness customers arranging their own temporary housing arrangements until permanent housing could be obtained e.g. staying with friends and family. With the predominance of single people in homelessness, the likelihood of double counting with overcrowded and concealed households is minimal.

Category	Data source	No. of homes
Homeless/temporary	Scottish Government Homelessness HL1'live' applications at 31 March 2021 with a deduction for cases that are likely to be resolved in the private sector.	4,825
Both overcrowded and concealed	HNDA Tool estimates for concealed and overcrowded based on the 2011 Census but uprated with SHS/SHCS 2018-2019 household estimates.	274
Support needs/special forms of housing	Edindex – Edinburgh's common housing register gold priority (where a household has mobility issues, and their existing home cannot be adapted to meet their assessed housing needs). It was estimated that 40% of gold priority households would require adaptations and around 15% a wheelchair home.	200
Total		**5,299**

Figure 12.3: HNDA3 existing Housing Need for Edinburgh (source: Table 4.4 HNDA3)

HNDA3 uses the 2018 population and household projections (NRS) published on 29 September 2020. The overall scale of demand from population and household growth is identified as a key demographic pressure across South East Scotland, impacting on housing supply, particularly in the City of Edinburgh Council area.

The analysis indicates significant issues of housing affordability in the private rented sector. Four-fifths of households in the City of Edinburgh Council area are unable to

afford a private rent. Two-thirds of households cannot afford to buy. This means that a higher proportion of newly-forming households will not have their housing need and demand satisfied within market housing, adding to the requirements for social rent and below market rent options.

Growth Scenarios

As recommended by HNDA guidance, HNDA3 estimates for the future additional housing units are provided as a range than a precise set of figures. The range is based on different demographic, affordability and economic scenarios that may occur over the period 2021-2040. The Project Team agreed six main scenarios, providing a range of options for growth.

The HNDA3 scenarios were processed through the HNDA Tool providing housing estimates for each local authority and South East Scotland as a whole. The average housing requirement for the City of Edinburgh ranges from 1,810 - 2,624 per annum over the 20-year period 2021 - 2040, with a cumulative total between 36,204 - 52,475 homes.

	Annual (20 years per annum)	Cumulative
Scenario 1 HNDA Tool Default	2,056	41,120
Scenario 2 HNDA Tool Default with LA Existing Need	2,214	44,279
Scenario 3 Strong Growth	2,624	52,475
Scenario 4 Steady Growth	2,213	44,257
Scenario 5 Slow Growth	1,810	36,204
Scenario 6 Stalled Growth	2,222	44,435

Figure 12.4 : HNDA 3 Scenarios (note: figures include rounding applied at data source; source: Table 4.18 SES HNDA3 Results for City of Edinburgh HMA, HNDA3 Final Report)

The requirement for affordable housing options (social rent and below market rent) outweighs the requirement for market housing (owner occupied and private rented) across all scenarios for the City of Edinburgh with particular emphasis on the need for social housing. Scenarios and outputs are set out in Appendix 7: South East Scotland HNDA3.

The Edinburgh and South East Scotland City Region Deal Directors' Group considered the range of HNDA3 scenarios and outputs in February 2022 and agreed a general preference for Scenario 4: Steady Growth. This scenario is based on providing moderate real terms income growth, principal household projections, 'creeping' equality, moderate/trend house price and rental growth. A ten-year period has been assumed to clear the existing need (2021– 2030).

The steady growth scenario estimates a requirement over the 20-year period of 44,257 homes, 30,835 of which should be affordable (70%).

Needs of those in further or higher education

HNDA3 does not include for the need/demand for the student population. HNDA3 is based upon household projections (Household Projections for Scotland (2022-based): Methodology Guide. In determining household projections, the number of people living in PBSA and other communal establishments are deducted from the population projections. Any need to provide for students is therefore additional to the needs of households. Provision of land for purpose built student accommodation is therefore considered separately from the LHLR. This approach is supported by the Scottish Government's Housing Land Guidance (Jan 2025). Housing land audits provide information on past completions and future programming of new homes in an area. The guidance is clear that alongside care homes, hotel/hostel and B&B use (including uses within Class 7 and Class 8 of the Town and Country Planning (Use Classes) (Scotland) Order 1997), student accommodation, should not be included in the HLA as they provide for specialist uses. The needs of those in further and higher education are addressed in Topic 14 Student accommodation.

Housing Land

The Council's Housing Land Audit 2025 (HLA 2025) sets out an estimate of expected housing delivery on allocated City Plan 2030 and consented sites. It identifies a total land supply which could deliver an estimated 48,479 units. This includes deliverable, deliverable with constraints, small sites and constrained sites.

Deliverable sites are those free of constraints, deliverable with constraints are those where there is one or more constraints and there is a commitment to overcoming these constraints and delivery is possible in the period identified in the pipeline. Constrained sites are those where there is one or more factors constraining delivery and where there is no current commitment to overcoming these constraints.

The HLA 2025 identifies that there is land for 9,828 units on sites that are currently considered constrained. The HLA identifies actions required to remove the constraints. Of the 58 constrained sites, 45 are constrained due to an existing land use, one is awaiting a determination from Scottish Ministers, two are dependent on the Council releasing the land, ten require resubmission of planning applications. Just over two thirds of the land supply is on brownfield land.

	Total	Greenfield	Brownfield
Deliverable or Deliverable with Constraints Sites	38,651	15,753 (41%)	22,898 (59%)
Constrained	9,828	396 (4%)	9,432 (96%)
Total Land Supply	**48,479**	**16,149 (33%)**	**32,330 (67%)**

Figure 12.5: Land supply all sites at 31 March 2025 (source: CEC HLA 2025)

The programming set out in the HLA 2025 anticipates that completions will reduce to 2,474 units in 2025/26 before increasing over the following four years as some of the large sites allocated within City Plan 2030 begin to produce completions.

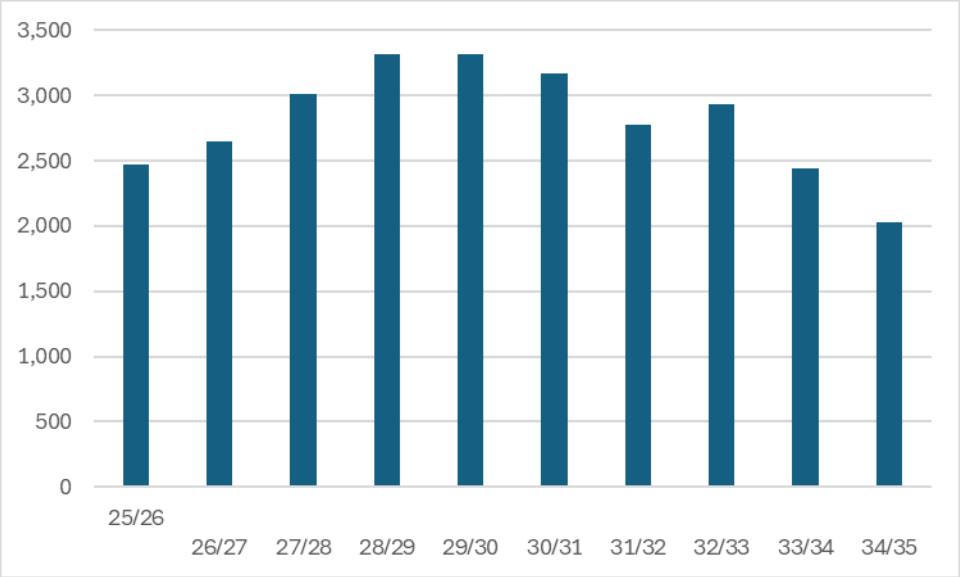


Figure 12.6: Anticipated completions 2025/26-2034/35 (source: CEC HLA 2025)

At the anticipated adoption date of City Plan 2040 in 2029, the HLA 2025 programming indicates a remaining supply of 27,193.

Programming assumptions are a snapshot in time. Some sites will be built out faster than anticipated and some slower. Furthermore, some sites may not be developed at all or be developed for uses other than housing and additional windfall sites will provide completions not anticipated at the base date of the audit. The remaining supply at the anticipated adoption will depend on actual delivery rates.

LDP guidance states that no sites should automatically roll forward from one plan to the next. All allocated sites will be assessed using the site appraisal methodology, which is covered later in this topic paper. This may result in some sites not being carried forward which could reduce the anticipated supply set out in the HLA 2025.

Completions

In 2025 the HLA recorded the second highest annual completion total over the last 20 years of 2,831. The highest rate of completions in the last ten years was in 2020 when there were completions of 2,967.

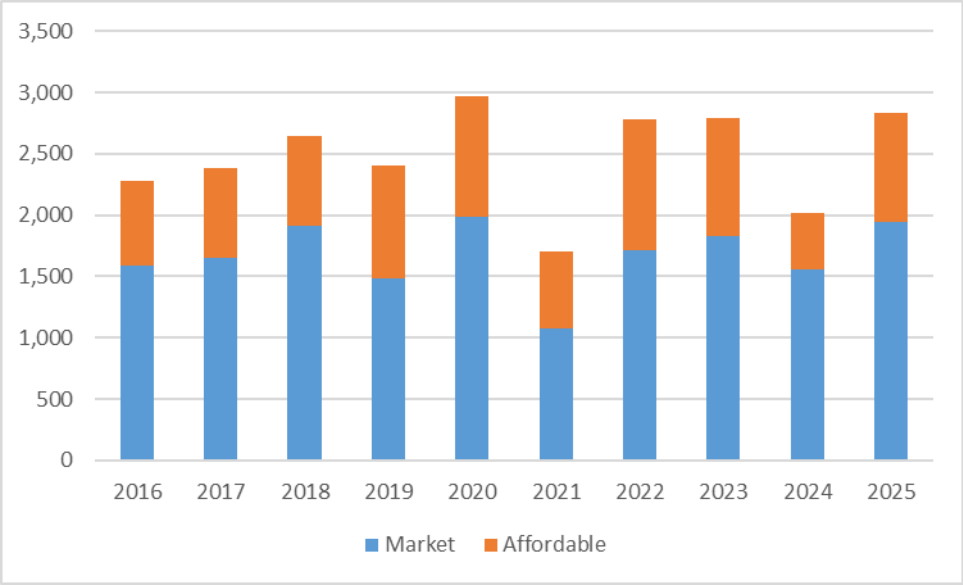


Figure 12.7: Completions 2016-2025 (source: CEC Housing Land Audit 2016-2025)

	Total	Market	Affordable	% Affordable
2016	2,281	1,585	696	31
2017	2,388	1,651	737	31
2018	2,651	1,911	740	28
2019	2,399	1,488	911	38
2020	2,967	1,986	981	33
2021	1,700	1,080	620	36
2022	2,786	1,716	1,070	38
2023	2,790	1,830	960	34
2024	2,019	1,556	463	23
2025	2,831	1,946	885	31
10 year total	**24,812**	**16,749**	**8,063**	
10 year average	**2,481**	**1,675**	**806**	

Figure 12.8: Completions by tenure

A flexibility allowance of 25% is included within the MATHLR. The NPF4 Minimum All-Tenure Housing Land Requirement Method Paper sets out that the flexibility allowance represents a contingency or over-programming of land to allow for changes in sites coming forward. Removing the flexibility allowance from the

updated MATHLR set out above results in an annual delivery rate of 3,224 per annum. This is a delivery rate of more than 750 units per annum above the 10-year average.

The HLA programming for the forthcoming years estimates that completions will reduce to 2,474 units in 2025/26 before increasing over the following five years as some of the large sites allocated within City Plan 2030 begin to produce completions.

Brownfield, vacant and derelict land and buildings

City Plan 2030 focuses on compact urban growth and the re-use of brownfield land. NPF4 Policy 9 supports development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings. Proposals on greenfield sites are not supported unless the site has been allocated for development or the proposal is explicitly supported by policies in the LDP.

The 2025 HLA showed that of the 2,831 units completed within the 2025 audit year, 1220 units were developed on Greenfield land (43%) whilst 1,611 units were developed on Brownfield land (57%). It is predicted that the percentage of housing completions on brownfield land should increase over the lifetime of the plan.

The Scottish Vacant and Derelict Land Survey 2024 identifies 17 derelict sites totalling 61 hectares and 31 urban vacant sites totalling 50 hectares in Edinburgh. This is only 1% of the Scottish total. The amount of derelict and urban vacant land has fallen since 2018 from 171 hectares. In the last year, two sites have been brought back into use totalling 3 hectares. The sites were developed separately for housing and for student accommodation.

The Vacant and Derelict Land Survey is a useful source of information but does not contain all brownfield, vacant and derelict land due to the size of the site or the site not meeting the criteria for inclusion. In Edinburgh, sites range in size from 0.13 to 14.7 hectares. Almost 75% of sites are below 3 hectares.

The Buildings at Risk Register (BARR) is currently maintained by Historic Environment Scotland and provides information on properties of architectural or historic merit throughout the country that are of risk. The register shows there are buildings on the register in Edinburgh.

The Buildings at Risk Register (BARR) for Scotland has been in operation since 1990 and highlights properties of architectural or historic merit that are considered to be at risk. Buildings at risk are not necessarily in poor condition, they may simply be standing empty with no clear future use or be threatened with demolition. A review of the BARR was undertaken in September 2024 and a decision taken to pause the BARR due to insufficient evidence to demonstrate that the BARR has a significant impact in bringing buildings back into use. The register remains as a resource. The register identified 79 buildings at risk in Edinburgh. A number of these buildings are within sites allocated in City Plan 2030 for housing led development. The buildings

included in the latest register have been considered in the initial urban capacity study. Topic 10 Historic assets and places provides a list of the buildings at risk in Edinburgh.

To inform City Plan 2030, an assessment of urban brownfield land was undertaken to identify land with potential for housing development and estimate the housing capacity that could be delivered on that land. This is set out on the Housing Study 2020. The search considered vacant/derelict sites, sites which were underutilised and land currently occupied but with uses which are anticipated to relocate or cease. This identified potential to deliver additional housing on brownfield land within the existing urban area. Some sites identified as part of this assessment were subsequently allocated for housing in City Plan 2030, others were not considered to be suitable or were less preferable at that time than those which were allocated.

To inform the development of the Proposed Plan, a high-level initial urban capacity study has been prepared. The study includes sites within the existing urban area defined in City Plan 2030. It excludes sites outwith this boundary, within the countryside or green belt.

It is informed by the Housing Study 2020 which forms the baseline of sites. The study has considered those sites identified in the 2020 Housing Study but not allocated in City Plan 2030. It is further informed by consideration of:

- Scottish Vacant and Derelict Land Survey
- Buildings at Risk Register
- Housing Land Audit 2025 - sites included within the HLA25 have been excluded from the study as they are accounted for within the existing land supply set out above.

A Call for Ideas will take place later in the plan preparation process allowing people to put forward ideas for the plan including sites for development, providing an additional source of potential sites for consideration.

The initial study indicates sites across 90 hectares, including those identified in the earlier studies, with potential for development across the urban area. However, further work will be required to ascertain the suitability of these sites, given this includes site which have previously assessed and discounted for the current plan.

The initial urban capacity study is set out as core document. It will be further developed in subsequent stages of the plan preparation process alongside the Call for Ideas scheduled for summer 2026 and thereafter the site appraisal work to inform the development of the Proposed Plan.

Town centre housing opportunities

LDP guidance advises that LDPs should provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive in identifying opportunities to support residential development.

Topic 19 City, town, local and commercial centres notes limited opportunities within Edinburgh's currently allocated town centres for new housing development. Opportunities to support residential development tend to be either in the change of use or refurbishment of existing and vacant buildings to residential use or sometimes through the redevelopment of vacant, underused brownfield sites. Edinburgh's town centres consist predominantly of shop units with residential tenements above limiting opportunity to provide additional housing. There are some single storey shop units which may have the potential to be redeveloped to provide residential uses above a refreshed shop unit.

Windfall

LDP Guidance advises that the Evidence Report should be informed by a windfall assumption which will take account of those sites which become available for development unexpectedly during the life of the LDP and so are not identified individually in the plan. Any assessment of the expected contribution of windfall sites to the indicative LHLR (iLHLR) must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends. The Council's Annual Housing Land Audit records the number of completions each year on allocated and windfall sites. In the 2025 audit year, there were 2,831 completions of which 1,260 were on windfall sites (44%).

In the five year period 2021 to 2025, there were 5,471 completions on windfall sites (45%) of all completions). This equates to an average of 1094 units per year.

Year	Total Windfall Completions
2021	823
2022	1155
2023	1,318
2024	915
2025	1,260
5 year average	1094

Figure 12.9: Windfall completions per annum (source: CEC HLA 2021-2025)

The majority of windfall units consented in the last 10 years have been on sites of 50 or more units. However, this includes past greenfield release sites following past planning appeals.

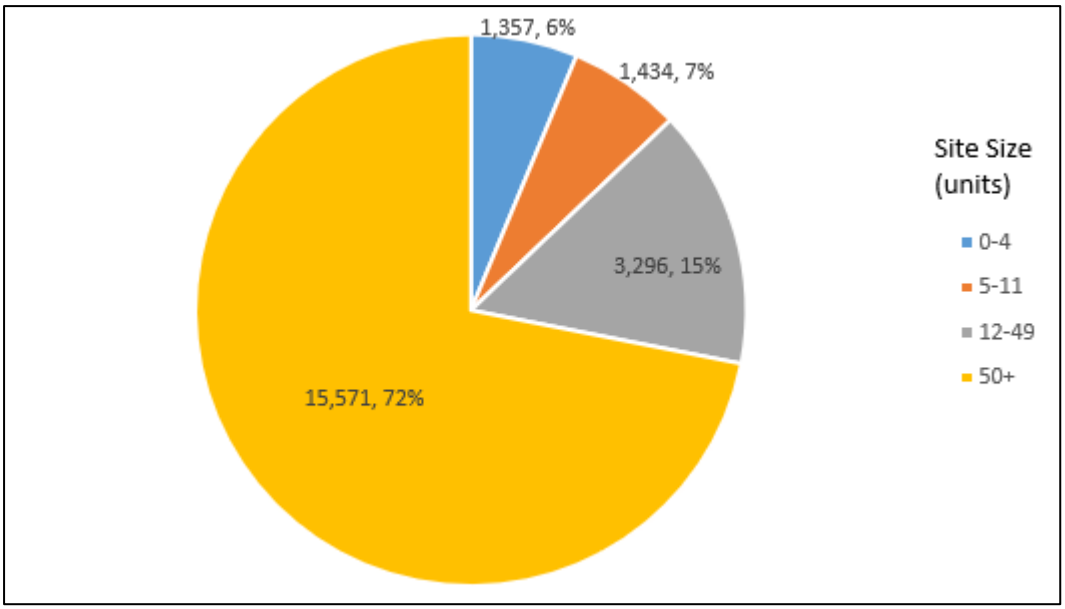


Figure 12.10: Housing units consented in windfall sites 2015-2025 by size of site (source: CEC Housing Monitor)

NPF4 Policy 16 supports development proposals for new homes on windfall sites only in limited circumstances where:

i. the proposal is supported by an agreed timescale for build-out; and

ii. the proposal is otherwise consistent with the plan spatial strategy and other relevant policies including local living and 20 minute neighbourhoods;

iii. and either:

- delivery of sites is happening earlier than identified in the deliverable housing land pipeline. or ·
- the proposal is consistent with policy on rural homes; or ·
- the proposal is for smaller scale opportunities within an existing settlement boundary; or ·
- the proposal is for the delivery of less than 50 affordable homes as part of a local authority supported affordable housing plan.

City Plan 2030 allocates a large number of sites within the urban area for housing which may previously have come forward as windfall. Alongside allocated sites, City Plan 2030 Policy Hou 1 supports housing in the urban area. The current land supply set out in the Council's HLA 2025 identifies 5,132 units on windfall sites. Many windfall sites consented are major developments (sites of 50 or more housing units or a site area of 2 hectares or more). There is some evidence of windfall sites coming forward since the adoption of City Plan 2030. However, it is too early to ascertain whether the impact of City Plan's strategy of allocating such sites will reduce windfall as predicted.

Demolitions/conversions

The Scottish Government recorded returns for demolitions for 2013 - 2024 indicate there have been 73 demolitions in Edinburgh in that period. It notes that information on private demolitions is limited.

	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	Total
All	1	26	8	10	-	-	21	-	-	7	73
Local Authority	1	26	8	10	-	-	21	-	-	-	66
Non-local authority	-	-	-	-	-	-	-	-	-	7	7

Figure 12.11: Total demolitions 2014 to 2024 (source: Demolitions and Conversions, Scottish Housing Statistics (note dashes represent years where no demolitions were recorded)

There was a net gain of 1,688 dwellings through conversions over the ten year period.

14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	Total
35	23	234	290	238	266	64	67	138	113	1,688

Figure 12.12: Conversions (Net new dwellings) 2014-2024 (source: Demolitions and Conversions, Scottish Housing Statistics)

In December 2025, the Council approved the demolition of two blocks of council owner properties. The intention is to replace the 150 homes lost with around 155 new homes. There are no indications from RSLs of any planned demolitions.

There have been significantly more dwellings created through conversions of other building than loss of dwellings through demolition in the last ten years. The Scottish government statistics show an average of only 7 units per year over the last 10 year period. This would equate to 70 units over the period of the plan. It is therefore concluded that the iLHLR does not require to be adjusted to allow for demolitions.

Self-build housing

In February 2026, there were 55 registrations of interest on the Council's Self-build Register. 79% have no preference where they wish to build in Edinburgh. 15 people expressed interest specifically in:

- Areas to West/South West
- Bruntsfield/Morningside
- Corstorphine/Dalmeny
- Granton/Leith/Portobello
- West, Ratho, Balerno, Currie, Kirknewton (x2)
- South Edinburgh
- South Queensferry

- North Edinburgh (x2)
- Cramond area to Queensferry to Ratho
- Portobello/Craigentinny
- Granton, Leith, Portobello
- Portobello/Abbeyhill
- EH1, EH2, EH3, EH12

Most people expressed no preference for greenfield/brownfield land. Individual house plots are most preferred but 60% would also consider a site within a larger development allocation. Most are unsure of what plot size they would be seeking. Where a preference was expressed, these were spread between less than 400 sqm and over 1,500 sqm. Further information on self-build housing is provided in Topic 13 Specialist and other accommodation.

Self-build is not monitored as a specific type of housing so it is not possible to identify how many dwellings completed in recent years have been for self-build.

Empty Homes

HNDA3 reported that in 2019, 5,608 dwellings (all tenures, including social housing, private rented housing, and owner-occupied homes) in Edinburgh had been empty for 6 months or more (2.22% of all dwellings). Scottish Housing Statistics reported that in 2019, 2,972 dwellings had been empty for 12 months or more (1.29% of all dwellings).

In September 2025, the number of empty properties had fallen to 3,083 of which 2,351 were long-term empty properties. It is a priority of the Scottish Government to bring as many empty homes back into use as possible. Actions are identified in Housing to 2040. Key elements include: working with local authorities to audit empty homes; supporting local authorities to access funds for bringing empty homes back into use; giving local authorities the appropriate powers to bring empty homes back into use (such as Compulsory Purchase Orders).

The Council created a dedicated Empty Homes Officer (EHO) role in 2019. To date, the role has primarily focused on investigating long term empty properties broadly described as problematic reported by neighbours, other members of the public and elected officials. A further two EHOs have recently been appointed and will allow a more strategic approach to empty homes including actively investigating new empty homes, exploring loan funds, matching specific properties to households, targeting homes for buy back.

The Empty Homes Strategy for Edinburgh was approved by the Council on 10 February 2026. It sets out a proactive approach to the management of empty homes. Work is targeted towards properties which fulfil the Council's strategic goals around homelessness and temporary/emergency accommodation as well as meeting

additional unmet housing needs (e.g. larger family homes and accessible/adaptable homes).

Since April 2024 homes which have been empty for 12 months or more have been subject to a 100% council tax premium. The Housing Scotland Act 2025 and the subsequent Statutory Instrument laid on 22 December 2025 removes the cap on the premium charge for second and empty homes, enabling local authorities to set the charge at whatever rate is locally appropriate.

In December 2025, the Scottish Government launched an online portal to bring empty homes owners together with prospective buyers or developers. In 2024/25, 81 private homes were brought back into use in Edinburgh as a result of the Council's intervention, the majority were owner occupied.

End use	**2024/25**
Owner occupied	50
Let privately	19
Short term	5
Second home	2
Let through private sector leasing scheme	2
Let through a housing association management scheme	1
Purchased by the Council	1
Let at affordable rent	1
Sold at auction	0
Total empty homes brought back into use	**81**

Figure 12.13: End use of empty homes brought back into use through Council intervention 2024/25 (source: CEC Empty Homes Annual Report February 2026)

Scottish Housing Statistics indicates a potential additional supply of 3,080 properties which are currently empty in September 2025. The number of empty homes known to be brought back into use (those which have had Council intervention) over the last two years have been relatively small in relation to the scale of empty homes. Additional resources within the Council, the commitment to reducing empty homes through the homelessness emergency action plan, the national matchmaker portal and council tax premium could result in an increase in the number of homes brought back into use in future years. The tenure of the homes brought back into use in 2024/25 show that few of those homes are for affordable tenures. The Council's targeting of homes for buy back could increase the number of dwellings which are brought back into affordable tenures.

Second Homes

A property is classified as a second home if it is lived in for 25 days a year or more, is furnished and is not anyone's sole or main residence. HNDA3 reported that in 2019, 1,809 of Edinburgh's homes were second homes (0.72%). In September 2025 Scottish Housing Statistics indicate that this fell to 1,440, 0.53% of all dwellings.

From April 2024, second homes in Edinburgh have been subject to a double second home council tax charge. The Housing Scotland Act 2025 and the subsequent Statutory Instrument laid on 22 December 2025 removes the cap on the premium charge for second and empty homes, enabling local authorities to set the charge at whatever rate is locally appropriate. While it is too early for the impact of this to be measured, it may encourage owners to bring properties back into active use as permanent homes and therefore increase the available housing stock in Edinburgh. The Council has considered raising the premium further to 300%, however this has been delayed.

Dwellings used as Short-Term Lets (STLs)

NPF4 defines STL accommodation as 'the use of a dwellinghouse (a residential house or flat) for rental by persons other than the owner for short periods and for financial or other remuneration. Typically includes properties advertised as being available for holiday let, although can apply to other situations.'

STLs lets can be for home sharing, home letting, home sharing and home letting; or secondary letting. Where an entire dwelling which is not a person's principal home is used for short-term letting (secondary letting), this result in the loss of housing.

In 2019 Scottish Government commissioned a research report, Research into the Impact of Short-term Lets on Communities Across Scotland, October 2019. The research assessed the impacts, both positive and negative of STLs on communities. Five key impacts were found:

- local economic benefits
- increased household income in the community from potential jobs and increase in STLs business earnings
- reduced availability of residential housing with the negative impact on affordability, sustaining communities, and the negative impact on the wider local economy and local public services
- negative impact on quality of life and well-being
- congestion and changing communities.

In response to concerns about the negative impacts of STLs across Scotland, the Scottish Government introduced new planning and licensing legislation to help local authorities to regulate short term lets. Section 17 of the Planning (Scotland) Act 2019 introduced powers for local authorities to designate Short-term Let Control Areas. In August 2021, City of Edinburgh Council consulted on a draft proposal to designate the entire Council area as a STL Control Area. The background report and statement of reasons – City of Edinburgh Council, Designation of Short-Term Let Control Area for Edinburgh Statement of Reasons Background Report, February 2022 identified:

- significant number of STLs
- issues for residents/communities

- impacts on housing supply
- impacts on neighbours and individual buildings

In September 2022, the STL control area was formally designated meaning that a change of use of a dwellinghouse for a short-term let in Edinburgh occurring on or after that date would be deemed a material change of use and requires planning permission.

Planning applications are assessed against City Plan 2030 Policy Hou 6 Inappropriate Uses in Residential Areas and NPF4 30 e). Policy Hou 6 does not permit a change of use which would have a materially detrimental effect on the living conditions of nearby residents. NPF4 30e) does not support the re-use of existing buildings for short term holiday letting where the proposal will result in an unacceptable impact on local amenity or the character of a neighbourhood or area or the loss of residential accommodation where such loss is not outweighed by demonstrable local economic benefits.

A report to Planning Committee in June 2023 refers to a study produced for the Council in May 2023 on the Economic Impact of Residential and Short-Term Let Properties in Edinburgh. It provided an economic impact assessment of various types of properties in Edinburgh if used as a residential property as opposed to being used for short-term holiday lettings. The analysis indicated that the gross value added (GVA) effects are greater for residential uses than short-term lets across all property types and all areas.

Since October 2022, a licence has been mandatory to operate a STL in Edinburgh. The Council's licensing register provides data on the number of currently licensed STLs and STL licence applications. In October 2025, the Council's register showed 2,953 licences had been issued for secondary letting. A further 335 applications were in the system.

73% of all licensed secondary lets are 2 bedrooms or less, with the predominant property type being flats as shown in the tables below.

Bedrooms	No. of licenses	% of licenses
1 bed	952	32
2 bed	1,218	41
3 bed	491	17
4 bed	165	6
5 bed +	127	4
Total	**2,953**	

Figure 12.14: Size of licenced secondary lets (source: STL Licencing Register, October 2025)

Property type	No.	%
Detached	50	2
Semi-detached	69	2
Terraced	134	5
Flat	2,673	91
Unconventional dwelling	27	1
Total	**2,953**	

Figure 12.15: Property type of licensed STLs (source: STL Licencing Register, October 2025)

Prior to the introduction of the licensing requirement, there was no comprehensive data source of STLs in Edinburgh. Secondary data available from Airbnb listings, a booking platform used to advertise STLs, suggests that the number of secondary lets has fallen in the last 5 years. Listings for entire homes (secondary lets) has almost halved from 2020 to 2024, from 7,895 homes to 3,694. While not an official source Airbnb data was used in the Scottish Government research referred to above which found that Airbnb comprised a very substantial part of the STLs market.

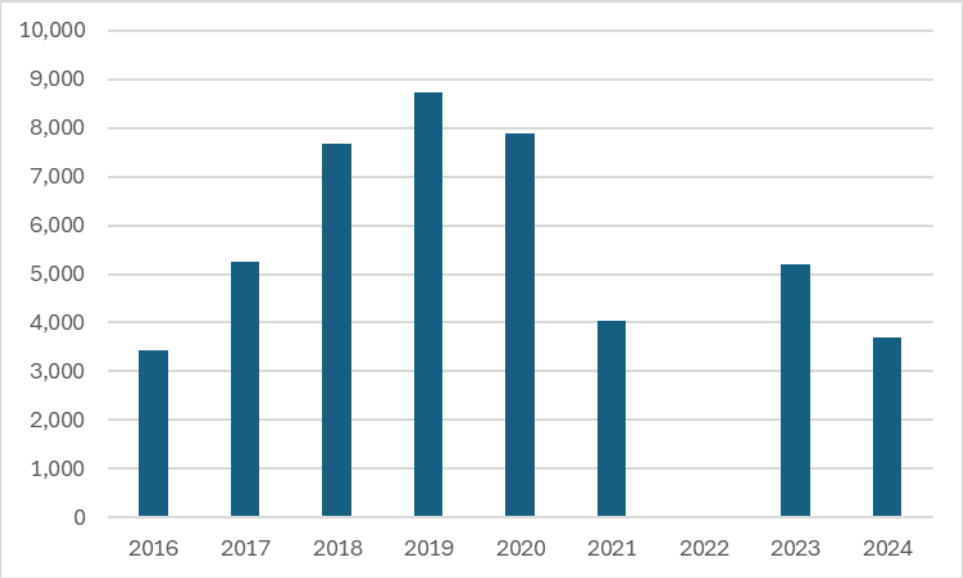


Figure 12.16: Airbnb Entire Property Listings 2016-2024 (source: Airbnb (note: no data is available for 2022)

Both Airbnb data and the number of licenced secondary lets indicate that regulations may be having an impact. However, it is not known how many of those dwellings which had been in use for secondary lets have returned to the housing market. It may be that some have been retained as second homes but as set out above, the number of second homes has fallen in the last year indicating that this may not be the case. There continues to be pressure on existing dwellings from secondary letting. Planning applications for change of use to STL between 2023 and 2026 show

that approximately 15% of applications are granted or allowed through appeal. This amounts to approximately 480 applications, however many of these approvals are for a change from existing other commercial uses so the impact on housing stock is less. This figure is not considered to have a significant impact with regards to the loss of new build housing.

Environment

In considering housing land and any future potential to accommodate additional growth, there are environmental factors that may be limiting to development.

The Edinburgh Green Belt plays an important role in directing the planned growth of the city and supporting regeneration. In addition to the green belt, Edinburgh has many areas designated as 'countryside' which fulfils many of the same objectives as the green belt. As set out in Topic 03 Green belt, countryside and rural, the Council has carried out a review of the existing green belt and countryside policy areas in relation to their character, landscape, natural setting and role in the identity of settlements.

As noted in Topic 10 Historic assets and places, Edinburgh has many cultural and heritage designations and sites regarded as internationally significant.

As detailed in Topic 04 Water management, flood risk and coastal change, a Strategic Flood Risk Assessment has been carried out which identifies areas where development may not be acceptable.

The impact of housing development on biodiversity, nature networks, soils, and agricultural land will need to be taken into account.

Topic 02 Natural places identifies that the west of the Council area, outside the urban area, has been identified as predominantly Class 2 agricultural land in the Land Capability for Agriculture (Partial Cover) map. There are also small pockets of Class 1 and Class 3.1 land of prime agricultural value. There is a presumption against development on prime agricultural land, with the limited circumstances when development on this land will be acceptable set out in NPF4 Policy 5 Soils.

City Plan 2030's strategy maximises potential brownfield land, the scope for further significant development to be absorbed within Edinburgh's existing urban area is considered to be quite limited (as noted in the preliminary Urban Capacity Study). In planning for future growth, environmental factors including the green belt, prime agricultural land, coastal change and flooding and Edinburgh's heritage will need to be carefully considered including the impacts from any changes.

Rural Homes

NPF4 states that LDPs should set out tailored approaches to rural housing and where relevant include proposals for future population growth – including provision for small-scale housing such as crofts and woodland crofts and the appropriate resettlement of previously inhabited areas.

The Scottish Government's 6 fold Urban Rural Classification 2020 should be used to identify remote rural areas. Plans should reflect locally appropriate delivery approaches. Previously inhabited areas that are suitable for resettlement should be identified in the spatial strategy.

In terms of the Scottish Government's 6-fold Urban Rural Classification, outwith the Council's urban area, the surrounding countryside is defined as 'Accessible Rural' i.e. within a 30 minute drive from the centre of a settlement with a population of 10,000 or more. There are no areas classified as 'Remote Rural'.

The proximity of parts of Edinburgh's countryside to the city and its surrounding settlements, means that it is under pressure for development. City Plan 2030 and previous LDPs have set a clear policy framework to prevent unnecessary development within these areas to ensure that housing is delivered in a planned manner and supported by necessary infrastructure and sustainable travel. In preparing the Proposed Plan, engagement with communities will be undertaken to establish if a tailored approach is needed in Edinburgh.

Summary

As set out above, there are sustained efforts to bring homes back into housing use. Through a reduction in the number of empty homes, second homes and homes used as short-term lets, there is potential for additional household capacity. These measures will continue to be monitored through the development of the Proposed Plan. Environmental, green belt, countryside and rural areas will also need to be considered as part of any approach.

Site Appraisal Methodology

LDP Guidance states that to inform the Proposed Plan a sites appraisal should be undertaken so that all sites are assessed using the site appraisal methodology agreed in the Evidence Report. This should include:

- sites allocated in an existing LDP
- sites proposed through any call for ideas; and
- any other sites the planning authority considers may have potential

Guidance suggests that the site appraisal process and the SEA requirements can be helpfully linked as they cover similar environmental topics. No site should automatically roll forward. All sites proposed to be allocated for development in plans should have been assessed for their deliverability through the site appraisal process. LDP Guidance states that detailed site appraisal will not be appropriate at the Evidence Report stage, but the authority could usefully establish a site appraisal methodology that will be used to appraise sites and inform allocations for the Proposed Plan. This could also be linked or ideally integrated with the approach to SEA assessment.

So that LDPs are deliverable, place-based and people focused, they should take an Infrastructure First approach. Plans should be informed by evidence on infrastructure capacity, condition, needs and deliverability within the plan area, including cross boundary infrastructure.

Guidance states that use of the Place Standard, consideration of Local Place Plans and guidance on local living and 20 minute neighbourhoods can inform allocation choices. Consideration should be given to infill sites, brownfield land and bringing back land and buildings into use, including in town centres, as well as to the results of business and industrial land audits.

Proposed allocated sites should be free of constraints as far as possible. Where constraints exist, sites can still be regarded as deliverable providing that the Delivery Programme sets out how constraints will be removed and the timeframe expected for this.

Proposed approach

The Site Appraisal Methodology, which has been included as an appendix to the Evidence Report within the core documents, has been devised taking into account:

- NPF4
- Scottish Government's Local Development Planning Guidance (May 2023)

Additionally, the following appraisal methodologies provided to the Council have also been taken into account in finalising the approach:

- Key Agencies site assessment and SEA checklist
- Homes for Scotland site assessment matrix
- Homes for Scotland deliverability checklist

The key agencies framework combines the SEA and site appraisal process. For City Plan 2040 the Council has taken a similar approach to avoid unnecessary duplication and the SEA forms Part 1 of the appraisal process.

The methodology comprises a number of key elements.

Part 1 – Environmental Assessment

The first step of the methodology is to carry out an environmental assessment of all sites under the following eight environmental topics:

- Biodiversity/fauna/flora,
- Population and health
- Soil
- Water
- Air and climatic factors
- Material assets

- Cultural heritage
- Landscape
- Townscape

The assessment will utilise a desk top approach using a range of data sources, largely based on the format of the SEA assessment.

Part 2 – Deliverability and Infrastructure

NPF4 requires sites for housing to be deliverable. It defines 'deliverable land' as land that is free from constraints or there is a commitment to overcome constraints and development is able to be delivered in the period identified for the site within the Deliverable Housing Land Pipeline.

The second part of the proposed City Plan 2040 methodology is based upon the consideration of the following factors as set out at paragraph 66 of the Scottish Government Housing Land Audit Guidance:

- Land use status
- Ownership
- Physical conditions
- Infrastructure
- Financial

LDPs are required to be based on an integrated infrastructure first approach. Therefore, the site assessments will draw on information from the infrastructure appraisals undertaken as part of the preparation of the Evidence Report and subsequent Proposed Plan, and other sources of information supplied by key agencies.

Part 3 – NPF4 Assessment

The third part of the methodology incorporates aspects of NPF4 considered relevant to the site selection process. It is not considered necessary to include the individual policies of NPF4 within the appraisal. Cognisance has been taken of the level of information which will be available for all sites during the appraisal process to allow a robust comparative assessment. As part of the 'Call for Ideas', the Council will set out the information that will be required to be submitted for proposed sites.

Site Selection

The outcome of the site assessments will allow sites to compared consistently against each other and those sites which score favourably will be considered further in the context of the emerging LDP strategy. The site selection stage will examine the relationship between, and the cumulative impacts of sites at a strategic level.

The appropriate selection of a quantum of sites will not just be based on their immediate environmental implications or deliverability but also on how they

contribute to the overall spatial strategy for Edinburgh. In addition, the new spatial strategy being developed for the proposed plan will also take into account the spatial aspects of NPF4, Local Place Plans and review the existing the existing spatial strategy.

Establishing an indicative Local Housing Land Requirement

NPF4 sets an expectation that LDPs identify a Local Housing Land Requirement (LHLR) for the area they cover. This is to meet the duty for a housing target and to represent how much land is required. To promote an ambitious and plan-led approach, the LHLR is expected to exceed the 10 year Minimum All-Tenure Housing Land Requirement (MATHLR) set out in Annex E of NPF4. The MATHLR is the minimum amount of land, by reference to the number of housing units, that is to be provided for a 10 year period. The LDP Guidance states that, in anticipation of this, an indicative LHLR (iLHLR) should be included in the Evidence Report.

Planning authorities must take the MATHLR into account in arriving at their iLHLR. While there is no statutory requirement, NPF4 expects that the LHLR will exceed the MATHLR. NPF4 states that the same evidence can be used to inform their iLHLR as that used to inform the MATHLR. However, where more recent information is available this should be used as it enables the Evidence Report to be more up-to-date in looking to the future, for example updated household projections, local need figures or a relevant change in local, regional or national policy.

The MATHLR should be the starting point for explaining the iLHLR, however it is not the role of the Evidence Report to set a new MATHLR as this is already established at a national level. The iLHLR can be viewed as an additional amount on top of the MATHLR based on more up to date information. The purpose of this section of the paper is to consider what additional amount is required as a result of any new information available and the current policy context.

When establishing an iLHLR, Scottish Government LDP Guidance and LDP Action Plan and Advice advises that Planning Authorities may include:

- Housing Need and Demand Assessment (HNDA)
- Local Housing Strategy (LHS)
- Updated household projections
- Any new or updated evidence on existing need and demand assumptions
- Economic growth and investment assumptions
- Past completions
- Windfall assumption
- SHIP

Edinburgh's MATHLR

NPF4 Annexe E sets a MATHLR for Edinburgh of 36,750. Whilst the MATHLR itself does not need to be revisited in setting the iLHLR, it is helpful to understand the basis in Edinburgh's context as this varies from some other authorities.

The MATHLR is set using household projections, existing need and flexibility as set out in the figure below.

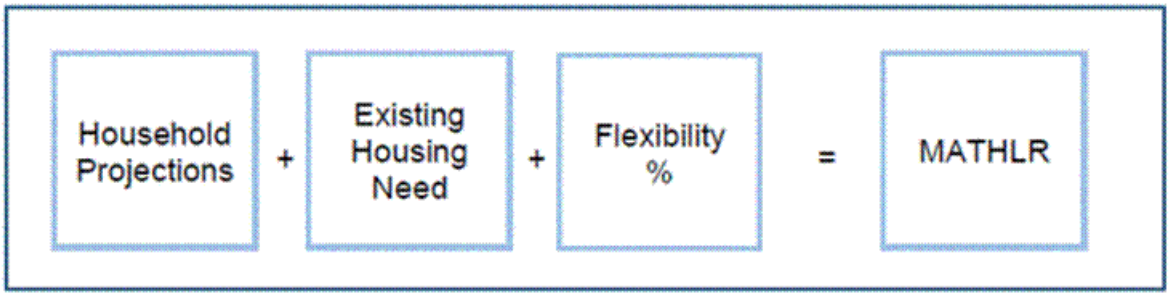


Figure 12.17: Inputs for establishing housing land requirements (source Scottish Government)

The methodology follows the first two stages of the HNDA process and is set out in the Scottish Government's Method Paper (2021) and the Draft NPF4 Housing Land Requirement Explanatory Report (2021). A summary is provided below:

- For household projections, the 2018-based projection of National Records of Scotland (NRS) data is used. This equates to step 1 of the Housing Need and Demand Assessment (HNDA) process.

- Existing housing need uses a count of homeless households in temporary accommodation and households who are both overcrowded and concealed, from NRS 2011 census information, the 2017-2019 Scottish Household Survey and Scottish Government homelessness statistics as at March 2020. This equates to step 2 of the HNDA process. Plus an additional amount representing support needs/specialist that cannot be met in existing provision.

- A flexibility allowance is then applied. This represents a contingency of land to allow for changes in sites coming forward. Under the definition used by the Scottish Government, Edinburgh is an urban authority, and the MATHLR incorporates a 25% flexibility allowance.

The figure below provides a breakdown of the final inputs for Edinburgh.

Existing need	**HNDA 3 Existing need comprised of:** **Homeless: 4,825** Scottish Government HL1 homelessness statistics (households in temporary accommodation) 'live' cases at 31 March 2021 with a deduction for cases that are likely to be resolved in the private sector based on past trends. **Both overcrowded and concealed: 274** Based on the Census (2011) but updated with SHS/SHCS 2017-2019 household estimates. **Support needs / special forms of housing: 200** determined through local assessment	5,300
Households	National Records of Scotland (NRS) Household Projections 2018- based high migration variant 2022-2037 averaged over 15-year period multiplied by 10.	24,100
Flexibility	MATHLR 25% urban authority flexibility allowance.	7,350
NPF4 MATHLR		**36,750**

Figure 12.18: NPF4 MATHLR breakdown of inputs (note: figures include rounding applied at data source)

Background to Edinburgh's MATHLR

The MATHLR went through several consultative stages which resulted in variations prior to the eventual MATHLR figure set out in NPF4. The key variants considered being the household figure and estimate of existing need.

The Initial Default Estimate from the Draft NPF4 - Housing Land Requirement Explanatory Report is set out below.

Households	Existing Need	Flexibility %	Flexibility Amount	**Initial default Estimate**
19,900	2,150	25	5,500	**27,550**

Figure 12.19 Initial Default Estimate for Edinburgh (note: figures include rounding applied at data source; source: Draft NPF4 - Housing Land Requirement Explanatory Report, Annex A)

For the household figure this was set out as the default scenario principal projection from NRS Household Projections 2018 and for need using the 'HoTOC method' for counting both overcrowded and concealed households using the data available at that time.

The Council was asked by the Scottish Government to consider this Initial Default Estimate and whether evidence justified proposing alternative assumptions to household projections, existing needs defaults and or a higher flexibility allowance. The Council agreed that the 2018 Household Projections were the most up-to-date and that the use of the principal projection variant, which uses assumptions about fertility, mortality and migration which are thought to be the most likely to occur, was a reasonable approach towards a minimum default housing land supply.

Concerns were raised however, on the use of an all-tenure figure as this did not accurately reflect the proportion of affordable homes needed and how they would be delivered, nor the demand figure evidenced by completions. The most recent HNDA (HNDA2) at that time demonstrated a higher demand for housing and a need that accounted for 60% of all homes to be affordable. To remedy this, the Council proposed an additional amount to be added to the figure to allow for more affordable homes to be delivered through additional market supply. Two amounts were proposed based on either a 25% or 35% affordable housing policy.

In response the Scottish Government agreed with the Council's view that the additional market supply to deliver affordable housing could be viewed as a different expression of potential household growth. To address this, rather than adding a separate additional amount, the NRS 2018-based high migration variant was used in calculating the draft MATHLR. This resulted in an increase of 5,450 households.

For the final MATHLR, the need figure was updated following the South East Scotland HNDA3 being declared as robust and credible. HNDA3 provided a lower existing need figure than that in the proposed MATHLR, counting both overcrowded households and concealed households as a single household to reduce the potential for duplication in line with the HoTOC method, plus an additional amount for supported need/specialist housing. This was considered a robust approach in accordance with the Housing Need and Demand Assessment (HNDA): practitioner's guide.

Updated Household Projections

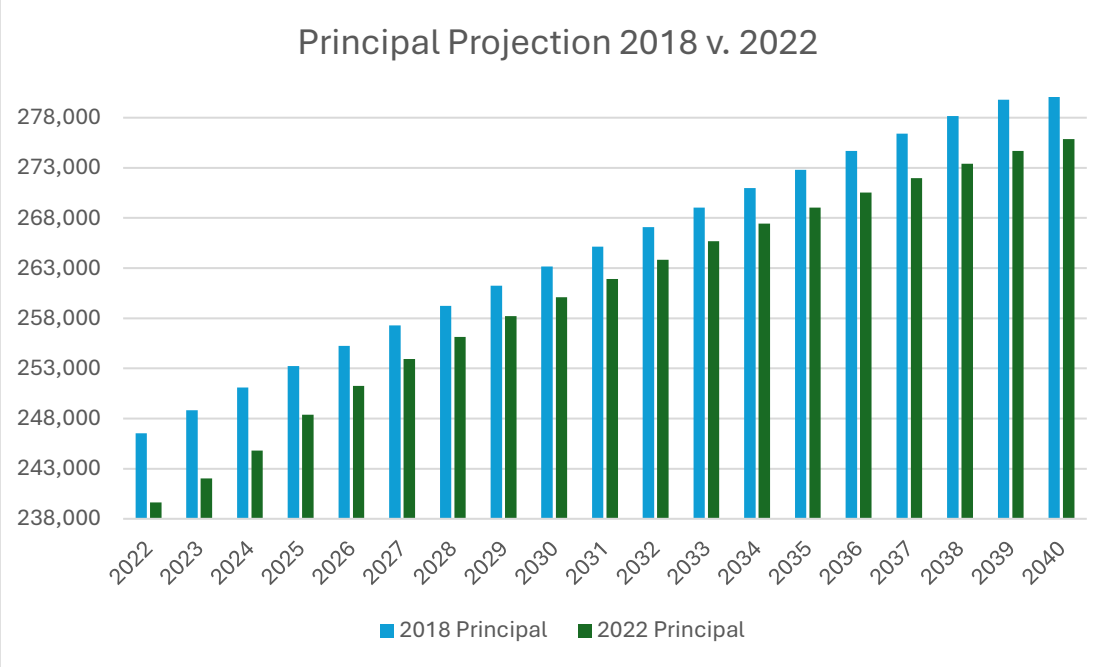
In December 2025 NRS published household projections for local authority areas in Scotland for the period 2022-2047 providing an update to those that formed the input to the MATHLR. A principal projection, which provides the most likely forecast, is set out alongside high and low variants based on different assumptions about future migration patterns.

		2022	2029	2034	2039
Principal		239,633	258,203	267,431	274,701
High		239,633	285,962	274,533	285,926
Low		239,633	259,529	257,964	259,528

Figure 12.20: 2022 based household projections – Edinburgh (source NRS)

The figures show that Edinburgh's households are projected to increase by 10.5% (based on the principal projection) between 2022 and 2032 and is the third largest growing authority in Scotland by percentage, behind neighbouring authorities of Midlothian (17.4%) and East Lothian (16.5%). Scotland's overall projected growth is 6.7%. In overall numbers, Edinburgh's growth represents the highest between 2022 and 2032 of the neighbouring authorities and second in Scotland overall behind Glasgow.

Whilst it is clear that Edinburgh's household growth remains high, this growth is predicted to be slower overall than shown in the 2018 household projections.



Figures 12.21: 2018 v 2022 based projections comparison

Between 2026 and 2039, this would represent a 4.5% decrease in the default principal scenario and 11.5% decrease over the assumed plan period of 2029 to 2039 when compared to the 2018 projections.

In setting the iLHLR, updated household projections are set out as a source to be taken account and listed in the recent publication of the LDP Action Plan and Advice note. The potential importance of the updated household projections was further implied in the recent letter dated 18 March 2026 from the Scottish Government's Chief Reporter to planning authorities referring them to a number of live Gate Check

cases where authorities had been sent further information requests asking them to consider if their Evidence Reports continued to provide sufficient basis for plan preparation when considering the recently published household projections and their iLHLR.

The MATHLR methodology uses the projected household growth between 2022 to 2036, starting at 2022 as this represents the year in which NPF4 was produced. It averages this over 15 years and multiplies this by 10 to provide the input for newly forming households. Applying this methodology to the 2022 projections and updating the time period to reflect current timescales and Edinburgh's expected plan period – the principal projection results in 18,322 newly forming households. If the high migration projections are used this, results in 26,191 newly forming households.

	2026 Households	2040 Households	Increase 2025/6-2040 number	10 year period (from 15 year annualised)
Principal Projection	248,382	275,865	27,483	**18,322**
High Migration	248,589	287,875	39,286	**26,191**

Figure 12.22: 2022 based household projections over 10 year period (averaged from 15 years 2025/6-2040)

	2029 Households	2039 Households	10 year period
Principal Projection	258,203	274,701	**16,498**
High Migration	261,085	285,926	**24,841**

Figure 12.23: 2022 based household projections over 10 year plan period (2029 - 2039)

Household Projection Scenarios

As set out above, the household projection figure included within the MATHLR comes from the High Migration forecast. It is notable that the inclusion of this figure is not based on modelling to suggest that the high migration forecast is mostly likely, it is instead used to gain a higher all tenure figure which in turn then allows for potential increased delivery of affordable homes through the affordable housing policy.

The forthcoming HEAP report also reviews the likely growth scenario based on the latest data available. It states that the steady growth scenario rather than high migration is the most realistic growth scenario: 'the 2022-based population statistics indicate higher migration and house prices and rents in Edinburgh have shown

significant growth in recent years, so a strong growth scenario may appear more likely. However, the impact of the housing emergency on housing supply may constrain future migration, making steady growth more feasible than strong growth.'

HNDA 3 presents a range of growth scenarios, which expand upon/differ from the low migration, principal and high migration scenarios included within NRS household projections. The role of the HNDA is not to set out which is most likely, however in considering HNDA3, the Edinburgh and South East Scotland City Region Deal Directors' Group considered and agreed a general preference for Scenario 4: Steady Growth. This scenario is based on providing moderate real terms income growth, principal household projections, 'creeping' equality, moderate/trend house price and rental growth.

Existing need

The most recent advice when considering existing needs as part of establishing the iLHLR is contained within the Local Development Plans: Evidence Reports and Gate Check Action Plan and Advice note. This sets out that new or updated evidence on existing need assumptions can be referenced and factored into establishing an iLHLR. It notes that 'care should be taken, however, not to undermine established methodologies, for instance on overcrowding, and authorities should be as clear as possible as to the sources and robustness of the approach.'

Background to existing need

The MATHLR utilises the established HNDA methodology, taking the existing need figure from the South East Scotland HNDA 3.

Category	City of Edinburgh	Summary methodology
Homelessness / temporary	4,825	Homelessness HL1 'live' cases at 31st March 2021 with a deduction for cases that are likely to be resolved in the private sector based on past trends.
Both overcrowded and concealed	274	HNDA Tool default estimates based on the Census (2011) but uprated with SHS/SHCS 2017-2019 household estimates
Support needs / special forms of housing	200	Due to differences in recording, each local authority used local records on households requiring social rented accommodation that cannot be met within existing provision e.g. wheelchair, extra care, complex housing needs, etc. Excluded from the list are transfer applicants who would leave behind a vacancy to satisfy another housing need
Total	**5,299**	

Figure 12.24: SES HNDA3 Table 4.4: Option 3: HNDA Tool with LA existing need 2021 (extract)

The HNDA approach to assessing existing need includes a count of homelessness households in temporary accommodation and households that are both overcrowded and concealed 'HoTOC'. HoTOC count is based on Scottish Government HL1 homelessness statistics (households in temporary accommodation) and a combination of the Scottish Household Survey (2017-19) and the 2011 Census (households both overcrowded and concealed).

The SES HNDA3 figures add an additional amount for households requiring social rented accommodation that cannot be met within existing provision e.g. wheelchair, extra care, complex housing needs, etc. based on local authority records.

This additional amount included within the MATHLR was evidenced through SES HNDA3 as a result of concerns that some households' needs, outwith the categories of homelessness and overcrowding / concealed, could only be met through the provision of new build housing. In particular, to specialist housing needs categories where there is low supply and turnover of specific housing types. HNDA guidance allowed for this assessment of existing need outwith the HNDA Tool, provided it also included in HoTOC method and excluded any existing need that can be dealt with using an in-situ or housing management solution. This element is further explained under the HNDA section of this topic paper.

Housing Need Calculation

An updated housing need calculation has been made. This updated calculation uses the same methodology as the SES HNDA3 which was applied and used in the formation of Edinburgh's MATHLR but now updates the figures using Edinburgh's current housing data. The figure below shows the updated data and presents a revised existing need amount.

Category		**Summary**
Net homelessness backlog	6,442	Homelessness HL1 'live' cases at 31 March 2025 with a deduction based on with a deduction for cases that are likely to be resolved in the private sector based on past trends (7,866 open cases minus 1,424 resolved within a year).
Overcrowded and concealed	368	Utilising updated 2022 Census analysis
Specialist need	256	Utilising the HNDA3 methodology percentage for existing need based on updated figure of 434 Gold priority applicants.
Total	**7,066**	

Figure 12.25: Updated housing need calculation using HNDA methodology

In comparison to the HNDA3 estimate of existing need, all inputs have increased resulting in an overall rise in existing need of 1,766 homes on top of what was established in HNDA3 and used in the MATHLR. The greatest increase is from homelessness cases, particularly as a result of the loss of the local connection requirement.

The use of the methodology and figures, also reflects those produced in the draft Technical Appendix to the forthcoming Best Value Review of the Housing Emergency Action Plan and Homelessness commissioned by the Council's Housing and Homelessness service - though it should be noted there is a slight discrepancy in the base live homelessness figure used in the best value review the Scottish Government's published figure. For avoidance of doubt, the iLHLR uses the Scottish Government's published live homelessness figure.

The Best Value Review of the Housing Emergency Action Plan and Homelessness and its Technical Appendix is intended to inform of the Council's Housing Emergency Action Plan and will be in consideration and delivery of the SHIP and LHS. It is expected to be presented to the Council's Housing Homelessness and Fair Work Committee in Summer 2026.

Further detailed information in relation to specialist housing needs are addressed in the Topic 13 Specialist and other accommodation.

Alternative Assessments of Need

Homes for Scotland (HfS) commissioned a Scotland wide study on housing need - Existing Housing Need in Scotland, January 2024. A separate report was prepared for Edinburgh- Existing Housing Need in Edinburgh City, February 2024. The approach uses a broader definition of existing household need than that currently used within the HNDA and MATHLR process. It does not consider newly arising need.

The report notes that the HoTOC figure used in the HNDA process only accounts for households with particularly pressing need. In estimating existing need, it takes account of households that are concealed, households that are overcrowded and additionally households living in unfit properties, households who are struggling financially as a direct result of their high housing costs and households living in properties who do not have the specialised adaptations or support they require. The study is based on a survey of 13,690 Scottish households and it is not known how many households in Edinburgh were surveyed.

The report notes that the survey is not intended to provide definitive figures but to give a more accurate indication of need based on primary research. It estimates that just under 67,000 households in Edinburgh are in existing housing need. When accounting for in-situ solutions and ability to afford to buy out of need, the gross figure reduces to around 41,100 households in net housing need (backlog) that need

an affordable housing solution. A further 13,700 households are in need and could afford a market solution.

The Council considers that the existing need figure generated in the report is excessive and has concerns on the robustness of the methodology and data used. It is based on self-reporting and extrapolation of a Scotland wide survey into the Edinburgh context. As a result, it provides an over-estimate of actual need based to a large extent on people's desires. The study provides a figure of 17,000 overcrowded households compared with 6,554 identified in the Census 2022 and 9,000 concealed families compared with 1,353 concealed families identified in Census 2022. The study does not take into account that other than concealed households, most of the households identifying as having a housing need also currently live in a home that would become available should the current household move elsewhere to meet their housing need. There then may be double counting with future need as a result. The figure takes no account of local evidence relating to the geography, environment and infrastructure of the area.

Research commissioned by the Scottish Federation of Housing Associations, Shelter Scotland and the Chartered Institute of Housing Scotland published in September 2025 (Affordable Housing Need in Scotland Post 2026) identifies how many affordable homes must be delivered between 2026-2031 to meet housing need in Scotland, and the associated cost. The report defines a household in affordable need if their housing situation falls below normative standards of adequacy and decency, and they are unable to meet these needs in the market. Multiple indicators of need including homelessness, insecurity, overcrowding, extensive disrepair, or the unsuitability of a home for a household's circumstances are relied upon. This is a wider definition of need than that used in HNDA3 and the MATHLR. The report identifies a gross affordable housing requirement for Eastern Scotland (City of Edinburgh, Clackmannanshire, East Lothian, Falkirk, Fife, Midlothian, Stirling, West Lothian) of between 6,249 and 9,198 homes annually. It does not provide a breakdown for Edinburgh.

Flexibility and Supply of Land

Edinburgh's MATHLR at 36,750 is by far the largest of all local authorities in Scotland. As a result, it also includes a significant number of additional units within its flexibility component which is set at 25% as an urban authority. This amounts to 7,350 additional units, a numerical amount larger than the majority of other authorities' total land requirements. The scale presents Edinburgh with a unique challenge in planning for its land supply and in establishing an iLHLR, particularly in consideration of average delivery rates and planning for infrastructure which may not be required.

NPF4 expects LDPs to set out sites which provide for a deliverable 10 year supply that exceeds the MATHLR. City Plan 2030 sets out a total anticipated land supply of 40,288 units. The latest 2025 HLA audits land in excess of 48,400 units and it is

estimated 28,100 units fall into the category of deliverable or deliverable with constraints over the next 10 years. Approximately 9,800 units are constrained. The remaining 10,500 units are those that are currently programmed outwith the next 10 years. Whilst there are noted challenges with what constitutes deliverable and constrained supply, there is significant land which is in excess of the MATHLR and which provides additional flexibility. It is however noted that the 2025 HLA is not fully agreed with by Homes for Scotland, who dispute the amount of deliverable land and likely completions. However, the 2025 HLA was considered by City of Edinburgh Council's Planning Committee on 12 November 2025 and signed off via the Business Bulletin at Committee 28 January 2026 and has been referred to the Scottish Government.

The supply of land is a consideration when reviewing against past and future completions. Edinburgh's completions figure over the last 10 years sits at an average of approximately 2,500 units a year. The highest delivery in any year was 2021 at 2,967 units followed by 2025 at 2,831 units. The HLA demonstrates that whilst completions are programmed to increase, they do not exceed the 3,765 units expected if the MATHLR was delivered equally over a 10 year period. It is accepted that past completions do not necessarily provide a measure of delivery going forward, they do however provide useful benchmarking.

As set out under infrastructure below, planning for an amount of housing land which is unlikely to be delivered is unhelpful, particularly at the significant scale required in Edinburgh.

Infrastructure and Capacity Considerations

In setting the iLHLR, consideration must be given to a range of factors which affect the capacity of the Council area to absorb new housing and to deliver sustainable, liveable places to deliver the outcomes of NPF4.

NPF4 establishes an infrastructure first approach. Plans should be informed by evidence on infrastructure capacity, condition, needs and deliverability. NPF4 defines infrastructure for the purpose of an infrastructure first approach as communications, transport, water management, energy supplies, health and social care services, education and green and blue infrastructure and spaces for play and recreation. These are addressed in the following topic papers:

- Topic 01a Infrastructure - transport
- Topic 01b Infrastructure - education
- Topic 01c Infrastructure - health and social care
- Topic 01d Infrastructure - energy and digital infrastructure
- Topic 01e Infrastructure - water and waste water
- Topic 06 Green blue infrastructure, open space and recreation
- Topic 07 Zero waste, energy, heating and cooling

The capacity of infrastructure will be a determinant of the ability to absorb housing growth in Edinburgh. As set out through the infrastructure topic papers and inputs into the Evidence Report, Edinburgh's infrastructure capacity is constrained with little scope to absorb household growth, particularly in regard to education, health and transport.

In City Plan 2030, the capacity of infrastructure was a key consideration in setting the spatial strategy and allocation of sites. The preference of allocating sites within the existing urban area and requiring denser development reflects this, allowing development to take advantage of existing infrastructure. For example, reducing the need to travel and utilising existing community infrastructure. However, with this alignment there remained a significant need for new infrastructure to be delivered and for developer contributions to support this.

Infrastructure funding, delivery and realisation also faces substantial challenges due to the difference between the supply of land, the infrastructure required in theory and the amount of development that is actually delivered.

When comparing the current delivery of housing units at an average of 25,000 units over a 10 year period with the supply that is planned for e.g. 36,750+ units over 10 years - this results in a considerable mismatch as there are 11,750 units that are planned for but not necessarily realised.

Even if delivery rates did increase to match those predicted in household growth at the MATHLR level, plus existing need, the additional 25% flexibility margin is so large that it results in an additional 7,350 units. The additional 7,350 units are broadly estimated to result in additional, and potentially unnecessary infrastructure at a cost in excess of £176 million.

In engaging with the development industry, contribution levels are already noted as currently unviable or at best very challenging. Planning for further additional amounts of development and associated infrastructure above and beyond what is already in place could hinder new development further, rather than increasing it, and present the Council with increased infrastructure funding gaps.

In short, planning for the development of housing that is unlikely to come forward puts the Council, developers and communities at a disadvantage, risking the delivery of housing and its supporting infrastructure overall.

Delivery of market housing

In February 2024, the Competitions and Market Authority (CMA), undertook a Market Study in Housebuilding investigating the housebuilding market. The study examined the overall nature of the market, including the factors that determine what homes are built. The study concludes that the housebuilding market is not delivering well for consumers.

Key drivers of the number of houses being built and their affordability are identified as the nature and operation of the planning system, and the limited amount of housing being built outside the speculative approach (such as affordable housing, self-build, and build-to-rent). The level of build-out rates is an additional factor.

The study found that the planning system is exerting a significant downward pressure on the overall number of planning permissions being granted across Great Britain. In Scotland, however, the number of homes given planning permission has increased significantly above the level of completions and assessed overall housing need since 2014-15.

Private sector housebuilders are likely to be more focused on building homes to meet demand rather than affordable need, as demand will determine what and how much they can sell.

As a consequence, the number of houses that housebuilders are likely to build is likely to vary according to the business cycle, with housing output strongly correlated with changes in macroeconomic outlook, and under-deliver housing relative to the socially desirable level, as the wider benefits of adequate housing are not captured by housebuilders. There may also be a disconnect in the types of homes housebuilders are incentivised to build as housebuilders may have less incentive to provide housing aimed at consumers on low incomes, for example.

The study reported that housebuilders do not build houses as quickly as possible but at a rate that is consistent with the local absorption rate, i.e. the rate at which houses can be sold without needing to reduce prices.

The CMA made recommendations to the Scottish, Welsh and UK Governments to improve market outcomes. However, the report acknowledges that even if policymakers make the changes proposed, while this would support improved market outcomes, the market may still fall short of delivering the quantity of homes, supporting a level of affordability, that policymakers find acceptable. This is because market outcomes are heavily influenced by external factors, such as interest rates, mortgage availability, the rate of new household formation, demographic change and the level of household incomes and market cyclicality and the market housebuilding model means that private housebuilders do not collectively have the necessary incentives to build houses at the rate required to meet policymakers' objectives. This indicates that providing more land may not result in more homes and in particular homes to meet need being delivered.

The Scottish Government published the Planning and the Housing Emergency – Delivery Plan in November 2024 referencing the CMA study. It sets out that across Scotland there are 29,000 homes given planning permission annually whilst both completions and house starts average only around 19,000 per year. It suggests the supply of land across the two city regions of Edinburgh and Glasgow to be 114,000 units and allocated land for over 64,000 units. Whilst there are a range of factors

which impact delivery, by association it points to the availability of land not being a constraining factor.

Economic

The Scottish Housing Market Review for Quarter 3 2025 reports that average house prices in Scotland, as measured by the UK House Price Index (HPI), increased annually by 4.4% This is the highest growth rate since Q4 2022, and the sixth consecutive quarter where annual house price growth has been positive.

The average house price in Scotland was £189,000 an annual increase of 4.4%. Average house price in Edinburgh increased by 3.4% in the same period to £284,000.

The number of mortgage approvals in the UK in July 2025 was 76,998 compared to 73,174 in July 2024, an annual increase of 5.2%. Over the year to August 2025, the average interest rate for new floating-rate mortgage advances fell by 1% to 4.8%, while for fixed-rate mortgages the effective rate fell by 0.5% to 4.22%.

The Scottish Housing Market Review for Quarter 1 of 2025 reports that data from the UK Government shows that the annual growth rate in the cost of construction materials used in new house building, which had reached as high as 24.% in June 2022, moderated sharply thereafter and has fluctuating around zero since June 2023, although it has been at or slightly over 1% in each of the most 3 months November 2024 to January 2025.

Edinburgh's proposed iLHLR

In establishing an iLHLR for Edinburgh, it is necessary to consider the updated information available within the context of what this means for Edinburgh. The two key updated sources of information set out in this paper are the Household Projections 2022 as published December 2025 and the updated data available regarding housing need.

In taking the updated Household Projections and applying this to an updated time period incorporating that of the forthcoming plan, this would result in a decrease of 5,778 households under the default principal scenario or an increase of 2,091 households under the high migration scenario.

	NRS 2022 Projections Principal Scenario 2025/6 - 2040 15yrs avg. as 10yrs	NRS 2022 Projections High Migration 2025/6 - 2040 15yrs avg. as 10yrs
	18,322	26,191
MATHLR Household projection (NRS 2018 based)	24,100	24,100
Difference	**-5,778**	**2,091**

Figure 12.26: Household projections 2022 compared to MATHLR input

In considering the scenario of either the default principal projection or the high migration projection, it is not proposed to use the updated figures from the high migration projection in establishing the iLHLR for the following reasons.

As set out previously, the high migration scenario was used by the Scottish Government in setting the MATHLR to allow for increased provision of affordable homes. It was not selected because it was the most plausible outcome based on external factors e.g. financial, market conditions or migration policy. Rather it was used as a substitute (resulting in a figure broadly similar to Council calculations) to provide what is referred to in the Scottish Government's NPF4 Housing Land Figures Method Paper as a 'policy expression' to increase the overall figure in order to provide for more affordable homes noting the Council's commitment for 20,000 affordable homes (at that time) and in consideration of the Council's proposed affordable housing policy percentage. The South East Scotland Directors Group overseeing HNDA3 considered steady growth (reflecting the principal projection) as the most likely scenario. More recently, as noted, the collaborative work undertaken with the Council housing service and the external CACHE group preparing the HEAP Technical Appendix to assess existing and future need, considers the principal projection as the most likely scenario when reviewing updated current financial conditions.

In determining that the high migration scenario should not be further used as a source in establishing the iLHLR, this also takes into consideration affordable housing need. The Council's recent budget decision on the housing emergency, alongside the extensive existing measures noted in the Council strategies as discussed earlier in the topic paper, will facilitate provision of affordable housing and housing growth. This measure will work in hand with the existing affordable housing policy and grant funding to enable the increased delivery of affordable homes.

Further, it is not considered appropriate to use the high migration figure in the iLHLR as a simple addition of further land supply has previously not proved to be a means to actual delivery of more homes, noting that this is disputed by Homes for Scotland.

When Edinburgh's land supply is compared to delivery rates, inflated provision can actually be a barrier to provision of homes given the associated additional infrastructure required.

Critically, not using the updated high migration figure does not take away from the original increased figure used in the MATHLR to deliver more affordable homes (i.e. where the 2018 high migration figure was used as a 'policy expression'). This original 'policy expression' increase still stands, along with the 25% flexibility enhancement of the overall need and demand figure. These are still in place as a means to increase affordable housing amongst other measures.

In this context, if the high migration scenario is disregarded and the 2022 default principal projection is used as the most reasonable input, the updated household projections do not trigger an increase in the land supply proposed as a result.

In looking at existing need, it is clear that there is a change in what is now required. This is set out in the table below using the same method as the South East Scotland HNDA 3, which was found to be robust and credible, and the same method as used to input into the MATHLR in 2022. The updated need figure has further been reviewed in the context of the Council's LHS and declared housing emergency and is considered appropriate. The revised figure represents an increase from the MATHLR figure of 5,300 units. As shown below.

Gross = open homelessness cases at 31 March 2025	**7,866**
- less those resolved by other means (e.g. PRS)	**- 1,424**
Net figure =	**6,442**
Census 2022 both overcrowded and concealed data	**+ 368**
based on 55% Gold Priority Housing applicants in existing need plus 17 in urgent need	**+ 256**
Total existing need figure =	**7,066**
Difference between MATHLR need figure (2022) and updated need figure (2025/26) =	(7,066 – 5,300) **1,766**

Figure 12.27: Updated existing housing need calculation
(Open homelessness cases source: Scottish Government Main Tables Homelessness in Scotland 2024-25)

If no additional housing land is required as a result of the updated household projections, but the additional amount of need is used, this established an iLHLR of 38,950 as set out below.

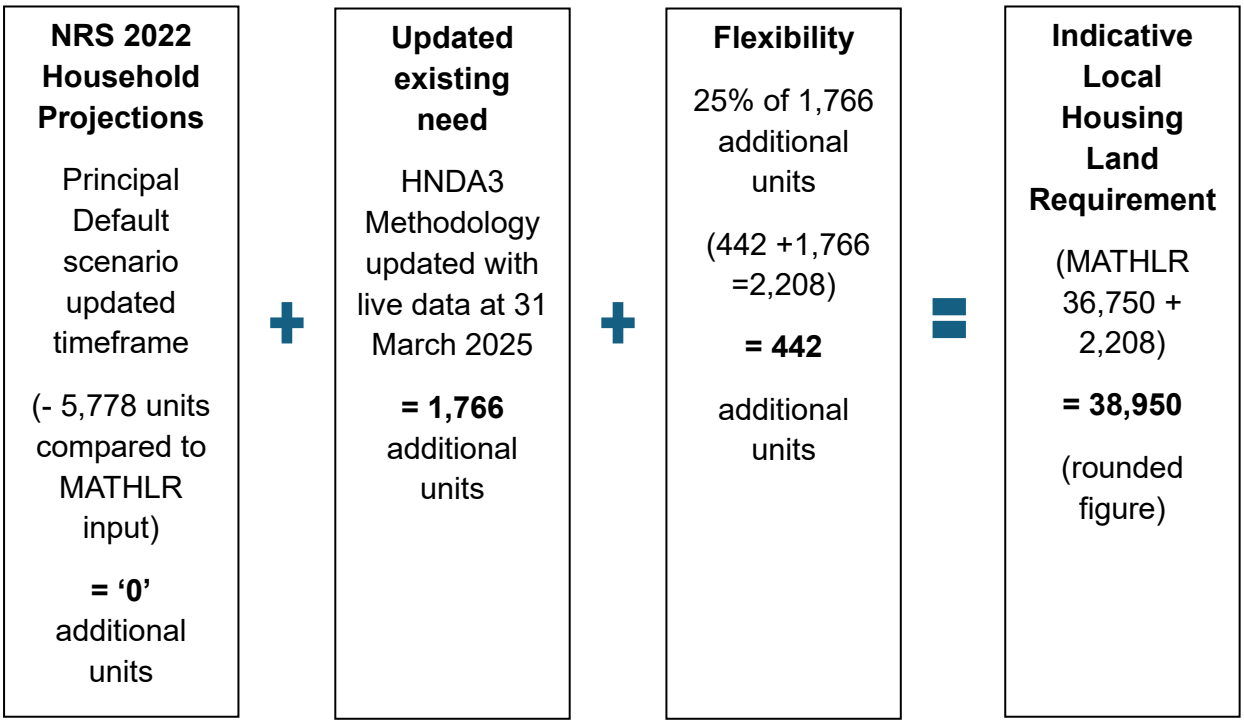


Figure 12.28: Indicative Housing Land Requirement

Adding the additional need plus the added margin for flexibility would add just over 2,200 units representing a 6% uplift on the MATHLR.

An indicative Local Housing Land Requirement of 38,950 units would provide an ambitious supply of land for Edinburgh. It would readily provide land for the 18,322 newly forming households anticipated in the updated household projections and the 7,066 households in existing need, with a substantial amount of flexibility accommodating additional growth, need (including additional specialist provision) and any changes in migration levels. The figure would enable delivery significantly exceeding past rates. The flexibility margin would be between 13,500 based on updated household projections or 7,800 units based on the MATHLR (MATHLR existing flexibility 7,350 + 442 from revised need). This continued high flexibility will allow the market to deliver in excess of demand, should building rates increase including at the high migration levels shown in the updated household projections, and further provide maximum flexibility to assist in delivering affordable housing.

Land Implications for Proposed Plan

Whilst the detailed implications for land supply are to be set out in the Proposed Plan, there are a number of high level considerations noted.

It will be the role of City Plan 2040 to allocate a deliverable supply of land to meet the indicative local housing land requirement of 38,950 units over the 10 year plan period, which is anticipated to be 2029 to 2039.

Some of this land is likely to come from the existing land supply established in the current LDP. However, all existing allocations for housing must be re-assessed for deliverability and as a result some may be removed.

Delivery of housing will also continue between now and the adoption of the plan reducing existing land supply further. The 2025 HLA provides a pipeline of expected housing delivery and estimates this at 11,458 units between now and 2029 when the plan is expected to be adopted. This is just above that of the average completions level of 10,000 units over 4 years.

The HLA records a current land supply of deliverable or deliverable with constraints land of 38,651 units, including programming beyond City Plan 2030's 10 year supply. If the pipeline was to be delivered as estimated, at the time of plan adoption, the land supply would be 27,193. This means that as a minimum City Plan 2040 will be required to allocate additional land for 11,757 units.

As noted under the housing land section of the paper, the proportion of deliverable or deliverable constraints land and pipeline programming is not agreed with Homes for Scotland. The land supply of City Plan 2030 will continue to be monitored through subsequent HLAs and this information will inform the preparation of the Proposed Plan with regards to land supply.

Housing Mix

The consideration of housing land in the Proposed Plan will also have regard to the size of homes required. Analysis of the 2022 household projections indicate that the majority of new homes required are for smaller 1-2 bed properties.

Housing Requirements by size (all tenures)					
	Existing need	**New 2026-35**	**New 2036-40**	**Total to 2040**	**Percentage**
Smaller 1-2 bed	5,271	15,482	5,135	25,888	75%
Medium 3-4 bed	1,405	4,125	1,370	6,900	20%
Larger 5+ bed	350	1,035	340	1,725	5%
				34,513	

Figure 12.29: Housing requirements by size (note total figure is for a 15 year period 2026-40)

The mix of home types and where they are required will be a key consideration for the Proposed Plan.

Engagement on iLHLR

The iLHLR was developed in collaboration with the Council's Housing and Homelessness service. This included regular discussions exploring evidence sources and Council programmes and strategies particularly with reference to those

addressing housing need, given that this makes the largest component of housing in Edinburgh.

Development of the iLHLR also took part across Council departments including Strategic Asset Planning, Development and Regeneration, Housing and Homelessness, Strategic Finance, Placemaking and Mobility and Development Management, covering implications for land, housing, transport, education and finance.

Following consultation at scoping, draft and finalised topic papers, a discussion took place with Homes for Scotland and their members on matters raised in their representations and the iLHLR.

Summary of stakeholder engagement

Key Stakeholder	**Homes for Scotland (HFS)**
Main views raised	**Scoping (May 2025):** A number of sources of evidence were suggested including: • Existing Housing Need in Edinburgh (HFS commissioned report, undertaken by Rettie/Diffley) • Homes for Scotland Briefing Paper: The Barriers to Housing Delivery • HFS Site Assessment Methodology and Deliverability Checklist. Need to consider national and local housing emergencies. Consider that housing need is underreported as per Diffley report) and through Edinburgh's HNDA which is too low and also out of date regarding projections. HoTOC method is too narrow for assessing unmet need and demand. A fuller assessment should be considered, Commented on restricted ability to fill shortfalls with windfall. Comments on the value of home building as better for economy and well-being. Dispute any plan making without Local Housing Strategy. Considers LHS must consider all tenure approach and figure and should also acknowledge the wider socio-economic benefits of home building. LHS should present an all tenure approach and include housing supply target. LHS not sufficient.

	Suggest that the Council consider different mechanisms for delivering a range of affordable housing types and take a more flexible approach on the proportion of different types delivered on each site to meet affordable requirements. Considers pressure on affordable housing is made worse by restrictions on the delivery of new private housing which would help bring supply and demand into better balance. LDP must allocate enough suitable, deliverable land, to meet actual levels of need and demand, on sites landowner support. Spatial Strategy similar to City Plan 2030 would continue to exacerbate the Housing Emergency. Consider green belt review needed for site assessment and spatial strategy and that greenfield land release is needed, particularly due to constraints on brownfield land, issues of deliverability also. Large sites do not deliver in short term. Suggest also that larger sites can delivery 20 minute neighbourhoods. Balance between this and allocating Restrictions on deliverable land and exasperating housing emergencies. All existing sites must be reassessed and expect a significant volume of the newly identified sites to be removed through the emerging LDP process to ensure that deliverable sites are allocated in the next LDP. LHLR must be ambitious. **Draft Topic Papers (Nov 2025) and Final Topic Papers (March 2026):** Edinburgh will have a crucial role in sustaining adequate working age population and tax base and plan positively for this. HEAP (and paper's reference to HEAP) must refer to PRS as only solution is increased supply. Positive paper recognises shortcomings of HoTOC, however HNDA 3 is too narrow in assessing need. Current count of homelessness exceeds HNDA 3 (5,299 v. 7.866) and broader definition required. Consider unmet need to include those living in homes that are physically unfit; households in homes that are not affordable to them; households in unsuitable homes (e.g. families without outdoor space); concealed households; overcrowded households; and those on waiting lists for affordable housing.

	Reiterate concerns over deliverability of current land supply. Note consideration is for 10 year supply not total supply. Positive updated Household Projections being taken account of in iLHLR. High migration should continue to be used. Consider evidence of lower under 40s household formation. HLA should be informed by government guidance. Finalised topic paper would benefit from including the breakdown by ownership for each brownfield or vacant site, and planning histories. Council should assess performance of 35% affordable housing policy and its impact on viability and make evidence used to inform existing plan available. Disagree with some commentary on delivery of market housing – making new supply would not increase delivery is incorrect. Refers to historic import of Edinburgh's demand and current plan providing insufficient land. Consider increasing supply will bring down costs overall. Rural homes can help sustain local services however, over allocation could reduce ability to meet LHLR given declining numbers of SME housebuilders. **Further response on iLHLR (May 2026):** HFS do not have concerns with the methodology itself used to inform the iLHLR and support the iLHLR being above the MATHLR, but raise issues regarding the justification for using the 2022-based Household Projection Principal Projection rather than the High Migration scenario. These include questioning why focussing on affordable housing should change the inputs into the MATHLR and iLHLR when they are all tenure figures. They do not consider justification is sufficient. The state the 2025 HLA should not be used as this has not been signed off by Council and is not online. They raise concerns previously noted on the deliverability of sites. They suggest the Council question why the 3,765 homes required under the MATHLR are not being delivered annually. They consider a range and choice of sites through further land supply will facilitate different delivery models that Edinburgh needs to deliver required housing.

	Disagree that availability of land is not a constraining factor, referring to their recent analysis on Scotland wide land supply. They also refer to evidence that land values in Scotland are increasing due to lack of supply and that the 35% affordable housing requirement is undermining development. Consider lack of land will prevent affordable homes that do not require subsidy levels of affordable rent and note that City Plan 2040 will cover multiple political cycles and funding decisions could change. State that the Edinburgh Chamber of Commerce economic growth ambition should be incorporated.
Council response and implications for the proposed plan	The Council have incorporated a range of sources of evidence where these are relevant to the evidence report. The LHS was completed and approved by Council in June 2025, the planning authority was involved in its development, and it is considered appropriate. It is not the role of the Evidence Report to change the LHS, but to take account of it amongst other factors. Green belt review has taken place and is covered in Topic Paper Green Belt, Countryside and Rural. HfS site appraisal methodology (along with Key Agency methodology) was considered in the development of Edinburgh's methodology. Edinburgh's methodology is appropriate to cover necessary considerations at the right level and to work closely with SEA methodology. Allocation of land and suitability of sites will be considered as part of the production of the Proposed Plan and its spatial strategy, this includes as a 10 year supply. This will include reassessment of existing sites in accordance with NPF4 and guidance. Edinburgh has discussed differences in HLA and will continue to discuss subsequent HLAs during plan development. HLAs are informed by current guidance. Ownership of existing sites forms part of the assessment for the Proposed Plan, and is not considered necessary at this stage. Affordable housing is a key consideration set out in the topic paper including the existing policy, there is only a short period of time from current plan adoption, and matters will continue

	to be assessed as the Proposed Plan is prepared. It is not necessary to provide evidence for the existing plan unless it is used to inform the next. iLHLR addresses HNDA 3 and takes account of updated homelessness count, increasing provision for this. LDP guidance requires robust methodology, and this includes HNDA, which is current and robust and credible for the Edinburgh area. It is important not to double count, which is a risk under untested alternative methodologies. There is also considerable flexibility in iLHLR to take account of need. iLHLR considers the updated Household Projections as set out in the paper. Figures have been updated as the Evidence Report has progressed. Household size figures are provided and demographics are considered throughout the Place Profiles. This work will inform the Proposed Plan. **Response to May 2026 comments on iLHLR:** As noted in the Summary of Evidence section of the topic paper, the High Migration growth scenario and the need to address affordable housing are not issues that can or should be looked at in isolation. The high migration scenario was used by the Scottish Government to increase the MATHLR figure in order to allow more affordable housing to be delivered through the 35% affordable housing policy, it was not selected as the most likely growth scenario in itself. Whilst targets are all-tenure, it is justified and reasonable to consider affordable housing need in Edinburgh, which at 70% of growth is the key driver, in setting the iLHLR. As noted in the topic paper, this increase resulting from the use of the high migration scenario in the MATHLR still stands, it has just not been used to increase the land requirement further again through the iLHLR, as there are now other increased means alongside this to deliver affordable housing need. It is not considered appropriate to provide a breakdown of figures as suggested by HfS at this stage, given it is an all-tenure figure. The 2025 HLA was published when considered by City of Edinburgh Council's Planning Committee on 12 November 2025 and approved via the Business Bulletin at Committee 28 January 2026. It has been referred to the Scottish Government. The HLA remains available on the Council's

	website. HfS's disagreement with its findings are noted in these committee reports and this topic paper. The Council disagrees that there is a lack of land supply in Edinburgh, and it is noted that the evidence referred to is Scotland wide rather than Edinburgh specific and therefor reflects local authorities with older plans and which do not have a recently adopted LDPs such as Edinburgh. The HLA sets out that Edinburgh has a total land supply of all sites of 48,479 and the LDP sets out a land supply of 40,288. The reasons delivery do not match that of the MATHLR are complex, and do not solely relate to land supply. It should be noted the house building industry also has a key role in delivering housing alongside other stakeholders. The Implications for the Proposed Plan and the Summary of Evidence in this Topic Paper refer to the need to consider housing land and acknowledge that increased land will be required and existing allocated sites be reassessed, including in relation to land ownership.
Is the agency content with the evidence?	No. HfS disagree on the input figure used as they consider the high migration figure should be used to inform the iLHLR.
Areas of agreement	Homes for Scotland will input further into the Proposed Plan and HLAs.
Outstanding issues	Beyond those noted above on LHLR, many comments relate to the existing plan and allocations and issues including site appraisal which are matters for the production of the Proposed Plan. As noted above the Evidence Report does not inform the LHS at this stage.
Actions for proposed plan stage	As indicated in the topic paper, Edinburgh will be undertaking assessment of sites and considering a spatial strategy. Engagement with Homes for Scotland will take place in developing the Proposed Plan.

Other engagement and matters raised

BGS

Suggested data sources:

- BGS UK Radon Potential Map

- BGS non-coal mining hazards.
- BGS Mining hazard (not including coal)
- Non-coal mining plans archive (scans)
- BGS GeoCoast
- BGS Geological Indicators of Flooding
- BGS GeoScour
- BGS Soil Parent Material Model
- BGS National Landslide Database
- BGS Infiltration SuDs Maps
- BGS Civils

Relevant sources have been included for Site Appraisal methodology.

HES

Site assessment and SEA proforma The SEA Consultation Authorities have developed a local development plan site assessment and SEA pro forma to align with NPF4. It has been developed to help inform 3 approaches to site assessment and to avoid duplication of effort. There is no expectation that the proforma must be used, and you are welcome to adapt and modify the proforma to suit your needs.

In terms of the implications of evidence for development of the LDP, the evidence report could include consideration of how the LDP will:

• Support the sustainable management of the historic environment through the spatial strategy

• Support the sustainable management of the historic environment through policy (where appropriate)

• Identify where positive outcomes for the historic environment and the aspirations of the LDP can align through the reuse of underused or vacant buildings.

• Support and recognise the contribution of the historic environment in policy areas such as tourism, brownfield land and empty buildings, health and wellbeing, cultural identity and net zero

Network Rail

- Suggest the following sources of evidence be included:
- NRS Populations Projections HNDA3 Housing to 2040 A Scotland for the Future – the opportunities and challenges of Scotland's changing population, Scottish Government, March 2021
- CEC Draft Local Housing Strategy 2025-2030
- CEC Housing Land Audit Scottish Government Housing Land Audit Guidance 2025

- CEC Strategic Housing Investment Programme 2025-2030 Scottish Government Housing Statistics
- City Plan 2030 Delivery Programme City of Edinburgh Economic Overview, Biggar Economics, February 2025
- Scottish Housing Market Review, Scottish Government

SEPA

We welcome that the site appraisal methodology is to take account of the place principle and the Key Agency Group framework.

Summary of implications for the Proposed Plan

The population and the number of households is projected to continue to grow over the next 20 years, albeit at a slightly reduced rate. This is reflected in the housing need and demand figures in HNDA3, the Minimum All Tenure Housing Land Requirement (MATHLR) and updated Household Projections. Addressing the scale of need and land use implications of the MATHLR and LHLR will be a key challenge in the Proposed Plan taking into account economic aspirations whilst recognising the environmental and infrastructure constraints to growth which exist, and limitations in funding for infrastructure. The spatial strategy in the Proposed Plan will be a key element in how this is articulated.

The Proposed Plan will need to set out enough land to meet the Local Housing Land Requirement, and this will result in the need for new housing allocations. While the Housing Land Audit 2025 indicates a significant supply of existing housing land the Proposed Plan will need to consider the deliverability of these sites, recognising that all existing sites must be reassessed. This will influence the scale of new allocations required, alongside the amount of housing that has been delivered on allocated sites between now and the eventual adoption of City Plan 2040. This is currently programmed at over 11,500 units.

Affordable Housing need makes up 70% of household growth projected for Edinburgh. Delivering affordable housing will continue to be a key priority for the Proposed Plan and the Council. In preparing the Proposed Plan it will be necessary to work closely with the Council's housing service and key stakeholders to ensure the strategy, policy and allocations of the plan address the affordable housing need priorities, including provision of suitable sites, larger affordable homes, changing demographics such as older people and the need for disabled and specialist housing as part of the affordable housing mix. The Proposed Plan will further consider the contribution to affordable housing required as part of new housing development.

The Proposed Plan will need to consider through the spatial strategy and allocation of sites, how the density and mix of unit types align with the availability or potential availability of infrastructure. Including where higher density is needed and where a

particular housing mix, such as smaller units may be most appropriate. The Proposed Plan will also need to ensure allocated sites are deliverable within the 10 year plan period.

The spatial strategy and allocations will need to consider how to create new communities and places whilst connecting into and reinforcing existing communities.

The Proposed Plan will need to consider the suitability of the NPF4 approach to rural housing and determine whether clarification in the form of a locally tailored policy is justified.

Statements of agreement / dispute

Homes for Scotland dispute elements of the evidence used in setting the indicative housing land requirement. They consider there is an underestimation of existing need, however they do not report concerns on the methodology and support the iLHLR being above the MATHLR. They consider the high migration scenario should be used in reviewing householder projections.

Other Key Agencies and stakeholders do not dispute the evidence.

13: Specialist housing and other accommodation

Topic	**13: Specialist housing and other accommodation**
Description of topic	Demographics, specialist homes, in particular, the need for and provision of housing for older people and disabled people, and the housing needs of Gypsy/Travellers and Travelling Showpeople.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** Section 15(1A) • The local development plan must also include targets for meeting the housing needs of people living in the part of the district to which it relates. Section 15(5) • the housing needs of the population of the area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people; and • the availability of land in the district for housing, including for older people and disabled people. Section 16(2)(ab) • in preparing the LDP the planning authority are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for self-build Section 16B(3)(b)(i)) • the Evidence Report must set out a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, and an analysis of the extent to which the action has helped to meet those needs. Section 16B(3)(c) • set out a summary of the action taken by the planning authority to meet the accommodation needs of Gypsy and Travellers in the authority's area, and an analysis of the extent to which the action has helped to meet those needs.

	The Town and Country Planning (Development Planning) (Scotland) Regulations 2023: Regulation 9 Have regard to: • any local housing strategy (LHS)
Relevant NPF4 Policies	• Policy 15 Local living and 20 minute neighbourhoods • Policy 16 Quality homes
Local Development Plan Guidance	Quality Homes (page 127) states that diverse needs and delivery models should be taken into account across all areas. LDPs should aim to diversify the range and types of homes that are built to meet people's needs and provide more choice for all. Expect place-based plan to: identify which allocations will help contribute to meeting specific needs including for: affordable housing, further and higher education, older people, disabled people and Gypsy / Travellers. Plans should consider the potential for all types of homes across all tenures including the types of homes below, informed by LHS, and where appropriate make provision for the following: • Accessible and adaptable homes, including wheelchair housing and intergenerational homes, to support independent living particularly although not exclusively among older or disabled people. • Build to Rent homes • Care homes and supported accommodation • Gypsy/Travellers and Travelling Showpeople, land should be allocated with access to services. Consideration should be given to design of sites, taking account the needs of the community – land allocated for Travelling Showpeople should have adequate space for storing and maintaining equipment. Consideration should also be given to the funding required to enable delivery.
Linked Topic Papers	• Topic 12 Housing land • Topic 15 Local living • Topic 16 Health and wellbeing • Place Profiles
List of and links to evidence	• **CD397** Housing Survey 2023: Research Findings, Age Scotland, April 2023 • **CD400** Accessible Housing Study Final Report, Arneil Johnston, October 2022 • **CD429** Why Coliving?, Conscious Coliving, July 2025

- **CD411** Care Homes for Adults, A Design Guide, Care Inspectorate, 2022
- **CD300** Edinburgh's Local Housing Strategy 2025-30, City of Edinburgh Council, June 2025
- **CD250** Affordable Housing Policy 2025 - Performance and Updated Guidance, City of Edinburgh Council, November 2025
- **CD315** Housing Emergency Action Plan – Update, City of Edinburgh Council. June 2025
- **CD362** Strategic Housing Investment Plan (SHIP) 2025-30, City of Edinburgh Council, December 2024
- **CD338** Our Strategic Workforce Plan 2024-27, City of Edinburgh Council, August 2024
- **CD368** Support for Build to Rent, City of Edinburgh Council, January 2020
- **CD320** Housing Revenue Account Budget Strategy 2025/26 to 2034/35 – referral from the Finance and Resources Committee, City of Edinburgh Council, February 2025
- **CD319** Housing Land Strategy Report, City of Edinburgh Council, December 2022
- **CD388** City of Edinburgh Council, Wheelchair Housing Planning Applications Monitor, October 2025
- **CD317** Housing Emergency Declaration, City of Edinburgh Council, November 2023
- **CD357** Self-Build Housing Land Register, City of Edinburgh Council
- **CD365** Strategy for Purchasing Land and Homes to Meet Affordable Housing Need, City of Edinburgh Council, December 2024
- **CD419** Quarterly Report Q3, Citylets, 2025
- **CD106** Housing Need and Demand Assessment 3, 2021-2040 (HNDA3), City of Edinburgh Council and South East Scotland Councils
- **CD447** Dementia, Edinburgh Health and Social Care Partnership
- **CD449** Edinburgh IJB Strategic Plan 2025-2028. Edinburgh Integration Joint Board,
- **CD666** Edinburgh Partnership Community Plan 2018 – 2028. The Edinburgh Partnership.
- **CD434** Existing Housing Need in Edinburgh, Homes for Scotland, Diffley Partnership and Rettie, February 2024
- **CD531** The Co-living Report, Knight Frank, 2024
- **CD546** Briefing sheet 15. Gypsy/Traveller carers, MECOPP, Minority Ethnic carers of older people project, May 2020.
- **CD692** What older people want, UK Government (Ministry of Housing, Communities and Local Government), November 2024

- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023
- **CD559** Household Projections 2018-based, National Records of Scotland (NRS), September 2020
- **CD563** Subnational Population Projections: 2022 based, National Records of Scotland, September 2025
- **CD554** Council Area Profile – Edinburgh City, National Records of Scotland (NRS), August 2025
- **CD586** Housing Prices in Edinburgh, Office for National Statistics (ONS), August 2025
- **CD587** Key Workers Reference tables: Table 19: Key workers by local authority and occupation groups 2019, Officer for National Statistics (ONS), May 2020
- **CD598** Healthy Housing for Scotland, Public Health Scotland, 2021
- **CD595** Care Home Census, Public Health Scotland, September 2024
- **CD602** Build to Rent In Scotland 2024 Market Review, Rettie & Co November 2024
- **CD604** How Co-living could get a foothold in Scotland, Ryden, December 2023
- **CD194** Scotland's Census, 2022 Reports, Scottish Government, 2022
- **CD139** Enhancing the Accessibility, Adaptability and Usability of Scotland's Homes Consultation, Scottish Government, June 2023
- **CD185** Programme for Government 2025-26, Scottish Government, May 2025
- **CD119** Affordable Housing Supply Programme, Scottish Government, 2025
- **CD153** Housing statistics: Houses in multiple occupation: March 2023, Scottish Government, May 2025
- **CD142** Evidence review- Accommodation Needs of Gypsy Travellers, Scottish Government October 2020
- **CD156** Improving the lives of Scotland's Gypsy/Travellers 2019-2021 Scottish Government, 2019
- **CD158** Interim Site Design Guide for Gypsy/Traveller Sites in Scotland provided by Local Authorities and Registered Social Landlords, Scottish Government, December 2021
- **CD154** Housing to 2040, Scottish Government, March 2021
- **CD146** Gypsy/Travellers in Scotland: an analysis of Scotland's Census 2022, Scottish Government, July 2025
- **CD213** Scottish Housing Statistics: Housing for older people and people with disabilities, Scottish Government, May 2025

- **CD210** Scottish House Condition Survey Local Authority Analysis 2017-2019, Scottish Government, February 2021.
- **CD562** Households and Dwellings in Scotland, 2024, National Records for Scotland (NRS), June 2025
- **CD182** Planning Delivery Advice: Build to Rent, Scottish Government, September 2017
- **CD208** Scottish House Condition Survey: 2022 Key Findings, Scottish Government, 2024
- **CD645** Landlord Performance: Statistical Information 2024/2025, Scottish Housing Regulator
- **CD644** Housing for Varying Needs, Scottish Homes, 1998
- **CD635** Executive Summary - Affordable Housing Need in Scotland Post 2026. Scottish Federation of Housing Associations, September 2025
- **CD229** Wheelchair accessible housing target: guidance note: MHDGN 2019/02, Scottish Government, June 2023

List of Areas Covered

This topic paper covers the following:

- Demographics
- Housing needs of older and disabled people
- Care homes
- Specialist groups
- Homes for larger families
- Build to Rent
- Houses in multiple occupation
- Housing needs of Gypsy/Travellers and Travelling Showpeople

Specific evidence on affordable housing and self-build homes in relation to the requirement to identify an indicative housing land requirement, are covered in Topic 12 Housing land. The housing needs of persons undertaking further and higher education is covered in Topic 14 Student accommodation. The Place Profiles examine housing on a ward basis and includes engagement findings on what people think about their homes and the needs of other within their area.

Summary of Evidence

National Context

NPF4

Policy 16 supports the delivery of high quality, sustainable homes that meet the needs of people throughout their lives. It supports proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision. This could include accessible,

adaptable and wheelchair accessible homes; homes that meet the needs of older people; a range of size of homes; and other specialist groups.

Policy 16 sets a minimum contribution to the provision of affordable homes of 25% but provides for higher contribution if justified by need or lower contribution can be justified for example by evidence of impact on viability, where proposals are small in scale, or to incentivise particular types of homes that are needed to diversify the supply, such as self-build or wheelchair accessible homes.

Policy 16 supports the delivery of affordable housing on sites not allocated for housing development where the proposal is supported by an agreed timescale for build-out, consistent with the spatial strategy, is for less than 50 homes and forms part of a local authority supported affordable housing plan.

Policy 15 seeks to ensure that 'new and existing communities are planned together with homes and the key local infrastructure' and the policy refers to 'affordable and accessible housing options, ability to age in place and housing diversity'.

Housing to 2040

Scotland's long-term national housing strategy: Housing to 2040 was published in March 2021. It sets out a vision for housing in Scotland and route map to get there by 2040. It seeks to support people to live in the homes they want to live in which are affordable and meet their needs.

Housing to 2040 reinforces the commitment towards promoting independent living. The report highlights that the majority of older people and disabled people live in mainstream homes and want to continue to do so, but some of these properties may not meet their needs. For those who do require more specialist forms of housing, such as extra care, there is only a small amount available nationally at around 1% of total stock with the majority in the social rented sector. Furthermore, some people with a physical disability, a learning disability or a mental health condition live in care homes or other settings due to a lack of suitable housing.

Housing to 2040 also highlights the considerable number of people in Scotland whose current housing needs are not being met. Approximately 61,000 people need adaptations to their home, only 1% of housing is fully accessible for wheelchair users and 10,000 disabled people are on housing waiting lists.

Local Policy Context

Local Housing Strategy 2025-30

The Local Housing Strategy (LHS) sets out the strategic approach to the delivery of housing and housing related services in Edinburgh, across all housing tenures.

It is a statutory plan prepared by the Council's Housing and Homelessness service with input from the Planning service. Consultation and engagement were integral to the development of the strategy. The LHS has been informed by three phases of consultation and engagement over the period from May 2024 to April 2025, engaging over 1,000 people.

The LHS was approved by the Council's Housing, Homelessness and Fair Work Committee on 13 June 2025. The overarching strategic vision for the LHS is that everyone in Edinburgh can access and live in a home that is warm, safe, high quality, meets their needs and that they can afford; and everyone can access the right support, at the right time to allow them to be part of a thriving community. The vision is underpinned by 12 strategic objectives including to deliver a supply of homes across affordable tenure types to meet demand, ensuring housing is accessible with the right support to meet everyone's needs.

The LHS identifies key challenges around ensuring that housing is accessible with the right support to meet everyone's needs:

- Building homes to meet the needs of a diverse and ageing population in a time of funding pressures.
- Responding to a growing global refugee crisis at a time when the city faces an acute housing crisis.
- Responding to need and demand for more accessible and wheelchair homes, including larger homes, in the context of funding pressures.
- The role of the private sector in providing more accessible and adaptable homes. Improving the way we deliver and resource adaptations.
- Gaps in knowledge about existing provision and future needs.
- Meeting housing and care/support needs of people with complex learning disabilities.
- Joined-up approach to housing and care and support.

Edinburgh's Housing Emergency

On 2nd November 2023, the City of Edinburgh Council declared a Housing Emergency, noting at the time that there were around 7,000 households in Edinburgh without a permanent home, with around 5,000 households residing in temporary accommodation.

Part of the key actions are to review the approach to adaptations (governance, policies, delivery and funding for adaptations across all tenures) to support independent living, prevent hospital admissions or delayed stays in hospital.

Edinburgh Integrated Joint Board (IJB) Strategic Plan 2025-2028

The Edinburgh IJB has responsibility for the strategic planning, resourcing and operational oversight of a range of health and social care services. The plan sets out the complex challenges facing Edinburgh's health and social care system and how the IJB plans to use the resources available to address them. It identifies 4 strategic priorities: prevention and early intervention; maximising independence; protecting the most vulnerable and using IJB resources effectively.

A focus of the plan is to reduce the dependence on acute hospitals and support more people with long-term conditions to live well in the community. Another focus is to invest capital for the development of new care homes and working with the Council to incentivise private developers to build more care homes in Edinburgh.

Edinburgh Partnership Community Plan 2022-2028

The plan, which is also the Council's Local Outcome Improvement Plan, sets the strategic direction for community planning in Edinburgh over ten years. It sets out a vision for an Edinburgh that is a thriving, connected, inspired and fair city, where all forms of poverty and inequality are reduced. It identifies three priority workstreams: enough money to live on; access to work and learning and training opportunities. Under the workstream of a 'good place to live', it sets out key aspirations including: a sense of belonging; a sense of connection; a sense of wellbeing; access to quality natural environments; equitable access to local shops and services; a sense of security; access to safe and affordable places to live.

Demographics

Population

National Records of Scotland (NRS) mid-year population estimates for 2024 provide the latest information relating to the size and make-up of Edinburgh's population.

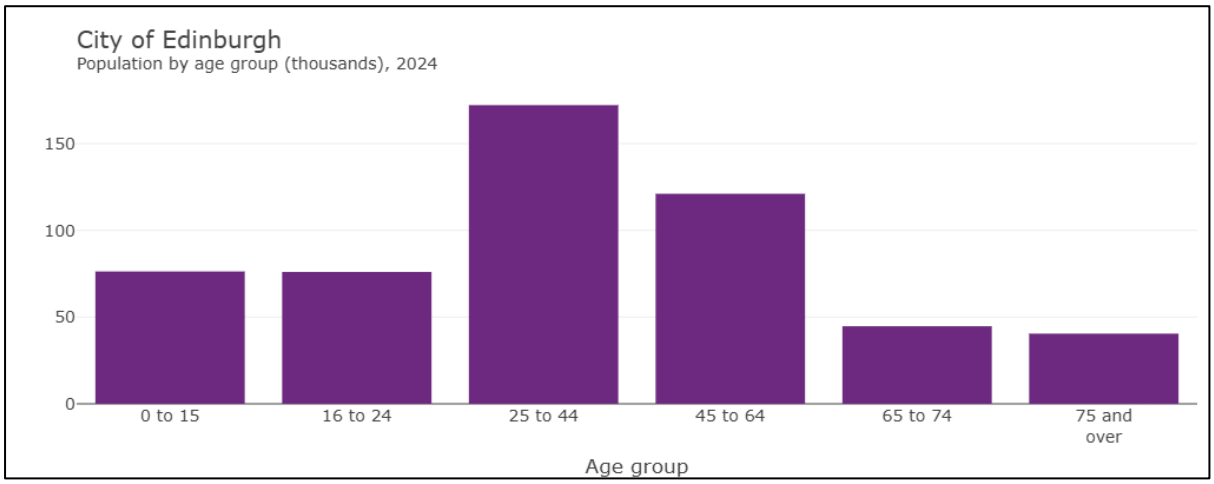


Figure 13.1: NRS Mid-year population estimates 2024

Over the last 10 years, Edinburgh's population shows growth in each age group.

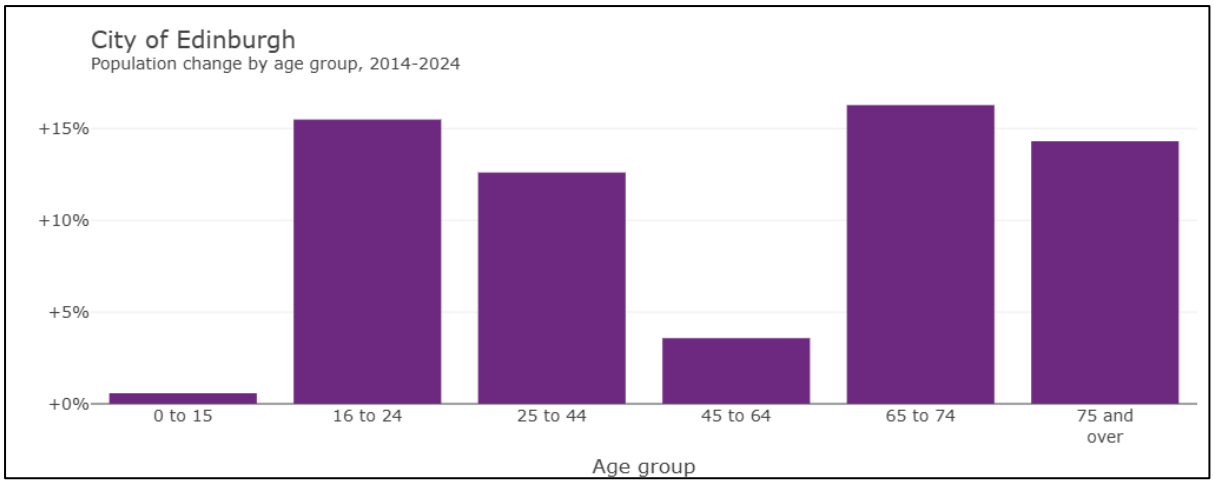


Figure 13.2: NRS Change in population by age group 2014-2024

Census information shows that the number of people reporting a physical disability, mental health condition, and/or long-term illness has increased between 2011 and 2022 in Edinburgh, as well as across Scotland as a whole. The proportion of people reporting a physical disability increased from 5.1% to 6.7% and for a mental health condition, the figure increased from 4.2% to 11.9%. In 2022, 19.5% of people in Edinburgh have their day-to-day activities limited, either a little or a lot, due to disability. The figure increases to over 50% for people aged 65 or over.

NRS produce population projections for local authority areas in Scotland. The projections provide statistics on the potential future size and structure of the population. They are based on past trends and assumptions about future levels of fertility, mortality and migration. They therefore have a degree of uncertainty particularly in later years. The latest population projections (NRS 2022 based) project population to 2047.

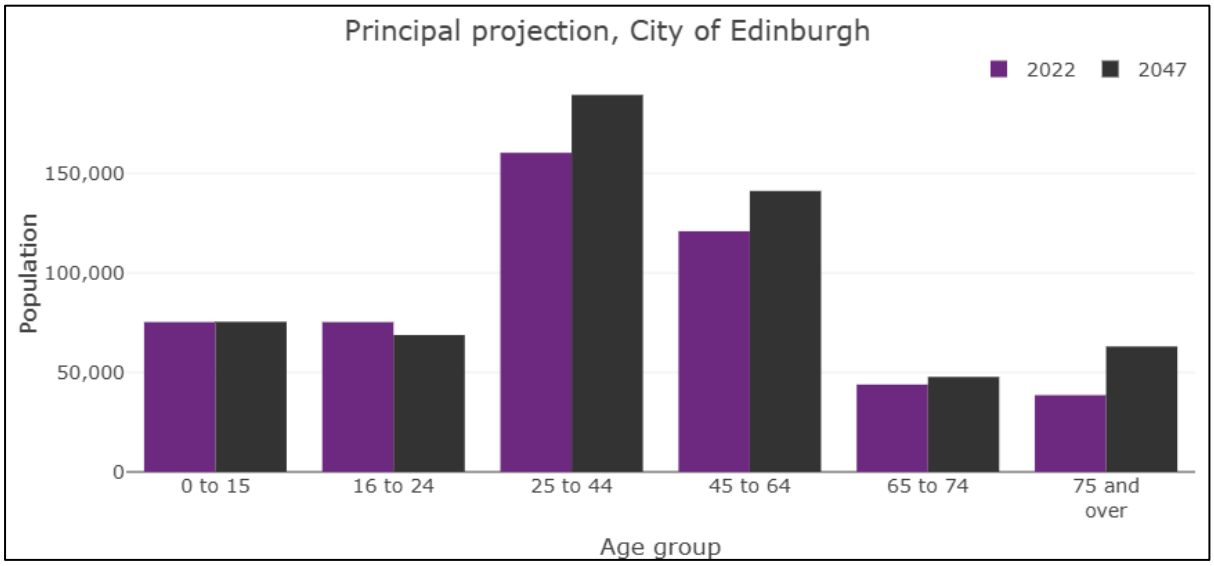


Figure 13.3: NRS Principal population projections for Edinburgh

The projections indicate an increase in all age groups with the exception of 16-24 age group.

Households

NRS household estimates 2024 indicate 244,791 households in Edinburgh, a 7.5% increase in the last 10 years. This compares with a 6.1% rise across Scotland as a whole.

The average size of households, both in Scotland and Edinburgh has been falling. In 2024 the average household size in Edinburgh of 1.96 was much lower than that of Scotland at 2.08.

	Edinburgh	Scotland
1 person	39%	37%
2 people	35%	34%
3 people	13%	14%
4 people	10%	11%
5 people	3%	3%
6 or more people	1%	1%

Figure 13.4: Household size (source: NRS Mid-2024 Household Estimates)

NRS produce household projections for local authority areas. The latest projections from Edinburgh are 2018 based. Topic 12 Housing land sets out the projected make-up of Edinburgh's households in the period to 2043 and this is replicated below.

Table 2.10: Household projections

	2018	2023	2028	2033	2038	2043	Change 2018-2043	% Change 2018-2043
City of Edinburgh								
1 Adult	94,483	101,009	106,252	111,041	115,378	119,430	24,947	26%
1 adult, 1+ child(ren)	12,436	13,074	13,576	13,963	14,003	13,804	1,369	11%
2 person all adult	73,257	77,596	79,944	82,490	85,671	88,514	15,257	21%
2+ adults, 1+ child(ren)	37,129	38,916	40,967	42,391	43,067	43,126	5,997	16%
3+ person all adults	18,467	18,245	18,505	19,155	20,053	20,851	2,384	13%
All Households	235,771	248,841	259,245	269,040	278,171	285,725	49,954	21%

Figure 13.5: 2018 Household Projections (source: HNDA3)

Inequalities

Edinburgh is a flourishing, prosperous city. However, wealth is not distributed equally. The LHS reports that 17% of Edinburgh's residents – and 20% of all children – are living in poverty across the city. According to the Scottish Index of Multiple

Deprivation (SIMD) which looks at the extent to which an area is deprived across seven domains: income, employment, education, health, access to services, crime and housing, 71 areas in Edinburgh fall within the most deprived 20%. Within this, 30 areas fall within the 10% most deprived and 18 within the most deprived 5%.

Living in poverty is one of the main causes of poor health and health inequalities. Increases in the cost of housing, declines in net supply and in-work poverty mean that housing affordability remains a key driver of poverty in Scotland. Public Health Scotland's Healthy Housing for Scotland report 2021 estimated that 19% of Scotland's population were living in relative poverty after housing costs.

The availability of affordable housing in a particular area can constrain or facilitate access to work.

Health and wellbeing

Edinburgh by Numbers 2024 reports that Edinburgh has the highest life expectancy and healthy life expectancy, compared with the rest of Scottish cities, with female population expected to live to an average of just over 82 years old and male population to 78 years old. Both male and female population spend an average of around 80% of their lives in good health. However, this is not equal across the city and there are recognised links between people living in poverty and poorer health outcomes.

It has long been recognised that housing has an important influence on people's health and wellbeing. Housing is one of the social determinants of health, which is linked to other factors such as employment, education and income. As noted in Public Health Scotland's Healthy Housing for Scotland Report 2021, housing can influence health directly through condition, security of tenure, overcrowding and suitability for inhabitants' needs. Wider aspects of housing that influence health indirectly include affordability and poverty, housing satisfaction, choice and control, social isolation, access to key services such as health care, and environmental sustainability.

Actions to End Poverty in Edinburgh 2025 Update (published October 2025, Edinburgh Poverty Commission) updates and refreshes the call for action needed to end poverty in Edinburgh by 2030. It identifies that some of the most important building blocks of good health and well being rest on a good job, a good home, a safe place, a good education, a sense of community and good local amenities in which to exercise, buy healthy food and enjoy green spaces.

High housing costs can reduce a household's access to other health-promoting factors such as nutritious food or leisure activities as well as the financial pressures can lead to poor health behaviours,

Having the right home is important for health and wellbeing and further evidence on this is provided in Topic 16 Health and wellbeing and also within the Place Profiles which provide a ward based analysis of health and wellbeing.

Housing Profile

Housing stock

Edinburgh's tenure mix differs from the rest of Scotland. Compounded by a dramatic reduction in social housing numbers in the late 20th century, only 16% of households in the city are in social rent housing. This is notably lower than the Scottish average of 22% and lower than most major cities in the United Kingdom. At 23%, the number of households in the private rented sector in Edinburgh is larger than the Scottish average of 13% (Scotland's Census 2022).

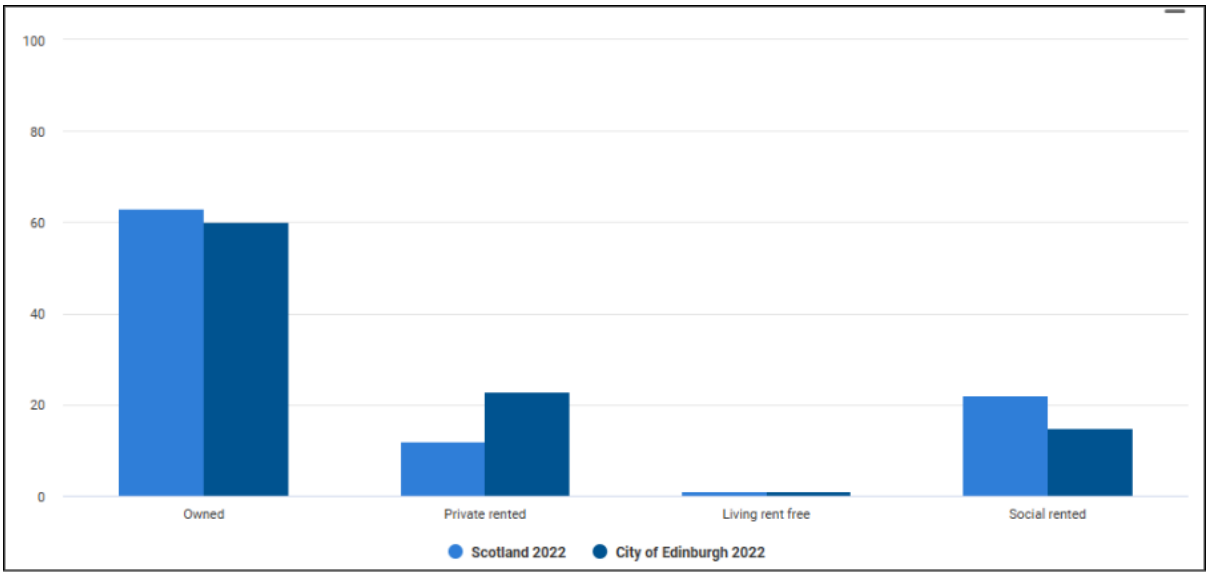


Figure 13.6: Dwellings by tenure in Edinburgh (source: Scotland's Census 2022)

Edinburgh has an ageing housing stock. Almost half the homes in the city were built before 1945. Edinburgh also has a high percentage (63%) of flatted properties.

	Edinburgh	**Scotland**
House or bungalow	37%	65%
Detached	11%	24%
Semi-detached	13%	23%
Terraced house	13%	18%
Flat or maisonette	63%	34%
Caravan or other temporary structure	0.03%	0.16%

Figure 13.7: Dwelling types (source: Scotland's Census 2022)

Scotland's Census 2022 shows that Edinburgh has a lower proportion of homes with three or more bedrooms with only 40% of homes of that size compared with 52% across Scotland as a whole.

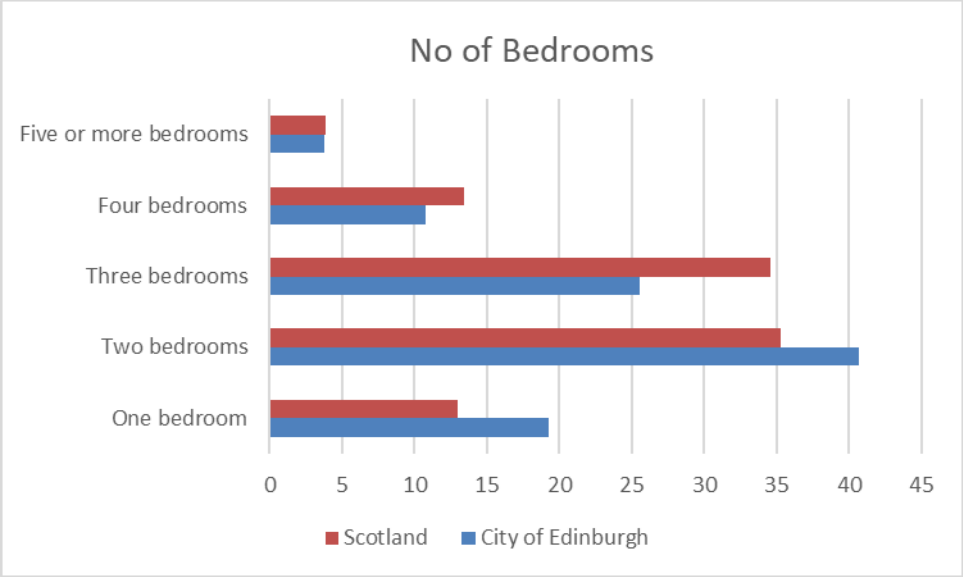


Figure 13.8: Dwelling size (source: Scotland's Census 2022)

The Scottish House Condition Survey provides information on the physical condition of Scotland's homes as well as the experiences of householders. The latest survey was reported in 2023. Data is not published for single years at local authority level due to insufficient sample sizes. There are no local authority publications relating to 2019 to 2021 due to the lack of data for 2020 because of the Covid pandemic and methodological differences since 2021.

Based on the data from the Scottish House Condition Survey Local Authority Analyses 2017-19, approximately 44% of all homes in Edinburgh failed to comply with the Scottish Housing Quality Standard, with homes in the social rented and private sector having higher percentage of non-compliance at 45% each, than those in owner-occupier sector at 43%. About a third (29%) of Edinburgh's homes were in urgent disrepair, i.e. homes requiring immediate repair to prevent further damage of the building or health and safety risk to occupants, ranging from 27% in the owner-occupier sector, to 28% in the social rented sector, to 35% in the private rented sector.

If focusing on the critical elements of a building, which relates to disrepair to building elements central to weather-tightness, structural stability and preventing deterioration of the property, the percentage reduced to 23%, i.e. about a quarter of Edinburgh's homes were in urgent disrepair of critical elements. Around 2% of the owner-occupied housing in Edinburgh was estimated to be Below Tolerable Standard (BTS), while no statistically robust sample was found in the social rented and private rented sector.

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owner-occupied housing in Edinburgh was estimated to be Below Tolerable Standard (BTS), while no statistically robust sample was found in the social rented and private rented sector.

Housing needs of older and disabled people

As set out in the population section above, the population of Edinburgh is ageing with the population aged 65+ expected to form an increasing proportion over time. The number of people with a disability has also been increasing.

HNDA3 presents trends in specialist provision. It acknowledges that coming to firm conclusions on numbers and projections is challenging principally because of different methods for collecting and recording data within and across local authorities and any attempt to provide specific forecasts in most cases would not be robust or credible.

A 2022 report from the Scottish Commission for Learning Disabilities highlighted the particular challenges faced by people with learning disabilities in being able to choose where and how they live. The IJB Strategic Plan identifies the lack of suitable housing for people with a learning disability as a chronic challenge. This can lead to people with a learning disability who have a high level of need remaining in hospital for years at a time because there is no suitable environment for them to be discharged to. The Edinburgh Health and Social Care Partnership is updating its Learning Disability Delivery Plan and will work with housing partners to identify housing needs for people with learning disabilities over the next 3-5 years so this can be factored into future social housing developments through the Strategic Housing Investment Plan (SHIP).

Between 2018 and 2030, the number of people estimated to have dementia in Edinburgh is expected to increase by 26.5% (Edinburgh HSCP JSNA Paper on Dementia). People with dementia face a range of challenges within housing. All the evidence suggests that staying at home helps people living with dementia achieve the best outcomes for themselves in familiar surroundings and where they can maintain connections with community life.

Affordability is a particular concern among older households. HNDA3 reports that older households continue to have the lowest mean annual income when compared to the other household types across South East Scotland.

Most older people live in their own homes rather than in specialist accommodation. Providing accessible and adaptable homes and services that support people to live independently in their own homes for as long as possible is important to meet the needs of an ageing population. A rapid evidence assessment on what older people want, and can afford, when it comes to their housing choices when looking to move was prepared by the Ministry of Housing, Communities and Local Government in November 2024. Findings included:

- preference amongst older people for remaining in their current home
- desire to live in housing that provides ready access to amenities, leisure facilities and green space, and is close to friends and family
- importance of adequate living space and spare bedrooms.

Research carried out on behalf of Age Scotland, Housing Survey Research Findings 2023 surveyed residents of Scotland aged 50+ to establish their views on their current housing situation. The majority of respondents considered that their home was ‘very suitable’ (45% of respondents) and ‘fairly suitable’ (40%) for their current needs. 38% of respondents felt that their property would be suitable in the next ten years, 37% did not and 23% were unsure. Reasons why current properties were unsuitable were that they were expensive to heat, inaccessible and required too much maintenance. 42% did not intend to move home. The main reasons for not considering moving home were that respondents felt that their home met all their needs and that they were comfortable in their home. Respondents considering a move would choose a home that was cheaper to run (44%) and fully accessible (40%). Their preference was for a bungalow or a flat, maisonette or apartment i.e. a property on one level. 27% of respondents who were considering moving home in the future would rather move to a new build property which they perceived would be more energy efficient and good quality.

These findings are also reflected in the ‘what makes a good place engagement’ which has informed the Evidence Report. This engagement asked the public what they thought about their homes and what changes they would like to make. The findings show that accessible housing was particularly mentioned.

The LHS notes that the Scottish House Condition Survey 2022 reports an estimated 28% of households in Edinburgh contain members who are long-term sick or disabled (LTSD), lower than the Scotland figure of 44%. In an estimated 4% of Edinburgh households, an LTSD individual is restricted by the dwelling. These figures are higher for older households compared to families and other households in both Edinburgh and Scotland.

Edinburgh has the oldest housing stock in Scotland, with almost half (48%) of homes built before 1945. Over 60% of homes in Edinburgh are flats, compared to the Scottish average of 36%. Both factors bring challenges in relation to adapting and upgrading homes and in meeting accessible housing needs from existing stock.

Homes delivered with the support of grant funding through the Affordable Housing Supply Programme (AHSP) are delivered to the standards set out in the Housing for Varying Needs design guide (HfVN) produced by Scottish Homes. HfVN provides guidance on good practice in the design of all housing, so that new build, refurbished or adapted buildings achieve a degree of flexibility, suit people of different abilities, are convenient to use and fit for their purpose. While many of the design standards within HfVN are now included in building standards, HfVN sets additional standards. The Scottish Government has committed to introducing the Scottish Accessible

Homes Standard for all tenures of new homes. A consultation, Enhancing the accessibility, adaptability and usability of Scotland's homes, was carried out in summer 2023 with a view to implement the standard through changes to building standards and guidance from 2025-26.

There are different types of specialist housing designed to meet the diverse needs of older and disabled people, which can include; age-restricted general market housing; sheltered housing and housing-with-care.

Scottish Housing Statistics indicate that in 2024, the Council had just over 1,500 sheltered units. In 2024/25, Scottish Housing Regulator data indicated there were around a further 3,160 sheltered, very sheltered or amenity units provided by RSLs.

City of Edinburgh Council has a long-standing target of 10% of all social rented homes being wheelchair accessible. A requirement for cross tenure targets for the delivery of wheelchair accessible homes was introduced in 2019 guidance for Local Housing Strategies. For the purpose of contributing to meeting the target, Scottish Government guidance requires that this means homes suitable for wheelchair users to live in should as a minimum comply with the design criteria indicated as a 'basic' requirement for wheelchair users, as outlined in Housing for Varying Needs (HfVN) (column 'B' in 'Summary of Design Criteria'). Local authorities are strongly encouraged to include the design criteria indicated as 'desirable' (column 'D' in 'Summary of Design Criteria') wherever possible.

An Accessible Housing Study was commissioned by the Council in 2022 and reported to the Council's Housing, Homelessness and Fair Work Committee in December 2022. The report made a number of recommendations including:

- Enhance the provision of wheelchair and accessible homes in the city across tenures, engaging with key partners to set achievable targets, taking into account factors such as property size and location.
- Build on the insight needed to better understand existing provision and improve capture of information on accessibility across tenures.
- Consider the role of regulation and engagement with private developers to enhance the contribution to wheelchair and accessible housing supply.
- Develop mechanisms to support the gathering of newly forming needs, including working with health and social care partners to improve data sharing and analysis, contributing to early planning and commissioning.
- Explore ways of improving data sharing and monitoring between partners.
- Ensure planning policy and a placemaking approach to development contributes to improved accessibility of the wider environment and infrastructure, as well as provision of homes in locations across the city.

One of the challenges identified in the study was the fragmented data across partners and professionals with limited insight on housing need, demand and supply

in the private housing sector. The study notes that information on wheelchair and accessible housing within the private sector is limited and this should be considered when defining the overall need for this specialist type of housing and a flexible approach in policy decision making around requirements considered.

The study estimated a total need for all tenure wheelchair housing of around 158 homes per annum. Benchmarked against average annual completions in Edinburgh (2,425 homes) this accounts for 7% of all annual housing completions. An indicative, cross tenure wheelchair accessible homes target of 7% annually for all completions was reported in the SHIP 2023-28.

The Council has been monitoring planning applications to identify the number of wheelchair accessible homes receiving planning consent. There has been a total of 179 wheelchair accessible homes granted planning permission since 2022, only 5 of these were provided by the private sector.

The SHIP 2024/25 pipeline includes 5% fully wheelchair accessible homes that could be approved over the next five years. Some sites or locations may not be suitable for fully wheelchair accessible housing and in most developments the wheelchair homes will be limited to ground floor properties. Challenges in delivering affordable housing at scale, with additional costs for wheelchair housing due to larger space requirements, need to be considered in terms of overall deliverability. Whilst additional extra funding is available through the AHSP for additional quality measures, these do not include extra funding for the provision of wheelchair or specialist homes. Additional costs can range from around £2,500 per home for general needs, older people or ambulant disabled persons homes and around £10,000 for a two-bed, four-person ground floor flat designed for wheelchair users (with even higher costs for larger wheelchair homes). RSL partners have also noted that they may have limited influence on the design of sites provided through the AHSP, which can be a barrier to providing more specialist homes. The provision of wheelchair and specialist homes will therefore almost always require above benchmark levels of grant funding. With a reduction in overall funding, coupled with overall benchmark delivering specialist homes will mean less homes overall.

There are widely recognised challenges in assessing current provision and unmet needs for accessible, specialist and wheelchair housing in Scotland including:

- No universally agreed standards or definitions of what is meant by accessible housing.
- Limited availability of hard data particularly on the extent and nature of provision and unmet housing need across a range of disabilities and health conditions.
- The tool developed by Scottish Government for carrying out Housing Need and Demand Assessment does not enable information to be collected on detailed requirements for accessible or wheelchair housing.
- Fragmented data across partners and professionals with limited insight on housing need, demand and supply in the private housing sector.

Given the expected increase in demand for accessible and adaptable housing and specialist accommodation that support people with certain needs, it will be important that the Proposed Plan considers how it can help to deliver these types of homes.

Care Homes

Public Health Care Homes Census, September 2025 indicates that there are 77 care homes in Edinburgh, providing 3,000 registered places. 57% of care homes are provided by the private sector, 30% by the voluntary/not for profit sector and the remaining 13% provided by the local authority. Since 2014 the number of care homes has fallen by 14%.

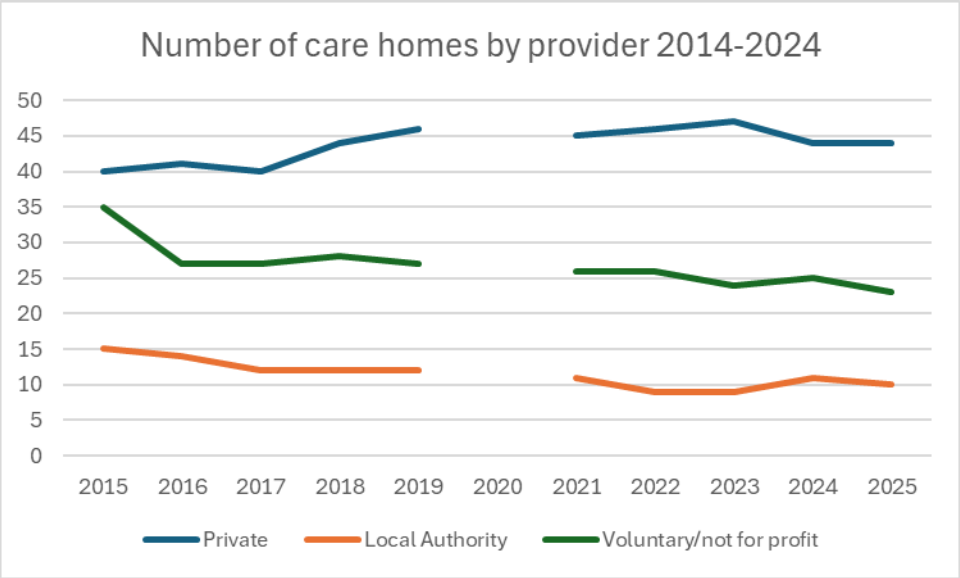


Figure 13.9: Number of care homes by provider 2014-2025 (source: Public Health Care Homes Census, September 2025)

Care homes provide for a range of care needs. Most care homes are provided for older people.

	Number of care homes	Registered Places
Older People	61	3,000
Learning disabilities	10	65
Mental Health problems	1	15
Other groups	2	20
Physical and sensory impairments	6	52

Figure 13.9: Number of care homes and registered places 2025 (source: Public Health Care Homes Census, September 2025)

Care Homes are not evenly spread across the city with notably less provision in the west of Edinburgh.

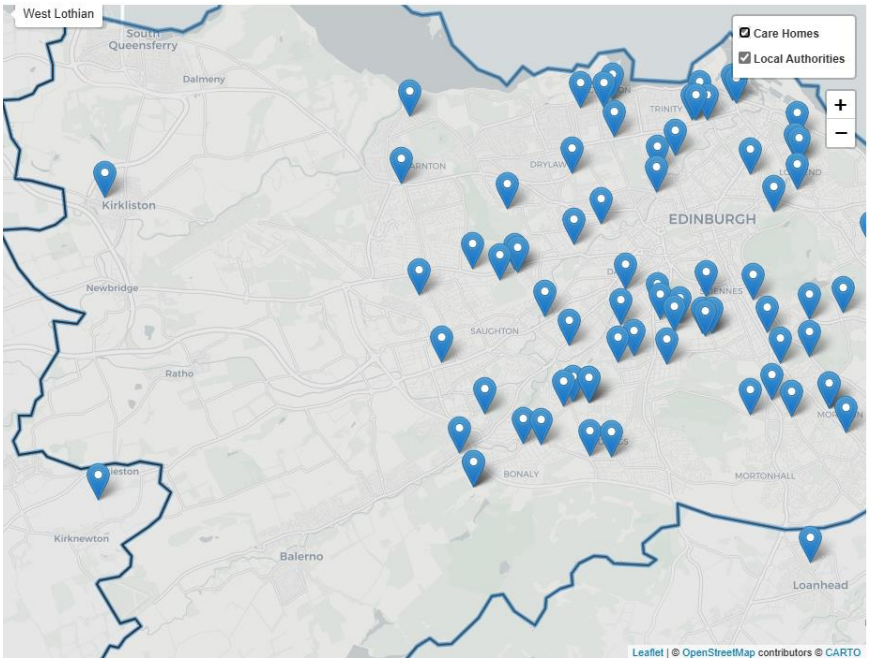


Figure 13.10: Location of Care Homes September 2025 (source: Public Health Care Homes Census, September 2025)

The Edinburgh Integration Joint Board (IJB) Strategic Plan 2025-28 notes that Edinburgh has fewer care homes for its population than might be expected for a city of its size. The Care Homes Census, September 2025 estimates that there were 34 places in care homes for older people per 1,000 population. The LHS notes that Edinburgh manages with comparatively few care home beds because it has a large market for care at home. In Edinburgh, 65.7% of older people aged 65 plus who have high levels of care needs live at home (compared to 63.5% Scotland overall).

Demographic change in Edinburgh will create more demand for health and care services. NHS Lothian undertook a comprehensive demand forecast programme which included projected demand for care homes in Edinburgh until 2043. The review used projected demographic changes based on the 2018 NRS population projections. Modelling forecasts that Edinburgh will need an additional 60 care home beds each year to keep up with population changes over the next twenty years. This is equivalent to an additional 1,200 care homes beds by 2043 (from 2023).

The IJB Strategic Plan states that they will invest capital for the development of new care homes and work with the Council to incentivise private developers to build more care homes in Edinburgh.

In 2022 the Care Inspectorate produced Care Homes for Adults - A Design Guide. It identifies the following as important elements of providing an integrated and connected environment:

- Access to local facilities; the premises should be sited in areas suitable for domestic living and should avoid non-domestic locations such as industrial or retail sites

- Access to public transport systems and pedestrian walkways, to allow both staff and visitors easy access to the home
- Being close to local community
- Suitable and stimulating visual outlooks
- The effect of noise or air pollution to be minimised to a level that is in keeping with a residential setting
- Accessible outdoor areas and environment that encourage people to move more
- Premises should be single storey where possible, and people living there and their visitors must have independent access to the outdoors
- Facilities, for example visiting rooms with outdoor access, Wi-Fi and IT availability, that support those living in the service to maintain contact with friends and family
- Appropriate and accessible car parking and cycle facilities for people using the service, visitors, and staff.

The Care Inspectorate recommends that care homes for older people should have no more than 60 residents in total. Care homes for younger client groups such as those for adults with mental health needs should have no more than 10 residents in total. Care homes for adults with autism and/ or learning disabilities must have no more than six residents in total.

From this evidence, it is clear that the delivery of new care homes will be important for Edinburgh in the future given the predicted ageing population and the increasing number of people with a wide range of disabilities. There needs to be consideration of where such services are under-provided within the city as well as ensuring they are part of an integrated and connected environment

Action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people

City Plan 2030 Policy Hou 3 Mixed Communities provides policy on the mix of housing. Proposals for housing will be permitted if it is demonstrated that:

a. they address local housing priorities by meeting identified gaps in provision,

b. development provides an appropriate range of housing of different types and sizes.

The mix should respond to the differing needs of residents, including families, older people and disabled people. Citywide objectives, including the Council's housing strategy, should inform the provision of housing to meet identified needs including accessible, adaptable and wheelchair housing. An inclusive approach to design of market and affordable housing should be taken to ensure homes are accessible to as wide a range of people as possible and provide adaptability for occupants to meet changing needs.

Guidance is provided in the Edinburgh Design Guidance (EDG). This supports the Scottish Government's Housing for Varying Needs Standards. Developers are encouraged to provide adaptations which facilitate independent living.

Guidance is also provided within the EDG on suitable locations for homes for older people and the need to provide for a range of mobilities. Provision of wheelchair accessible housing in the market sector is encouraged.

Listed Buildings and Conservation Area Guidance, September 2025 sets out guidance on adaptation of listed buildings for accessibility.

An accessible housing summit was held on 22 April 2025. The event was attended by Council officers from Housing and Homelessness, Planning, Building Standards and Children's Services, the Edinburgh Health and Social Care Partnership, members of Housing, Homelessness and Fair Work Committee, Registered Social Landlord (RSL) partners and third sector and private sector organisations. Three key areas were explored including delivering new accessible and wheelchair accessible homes. In summary the main points expressed through the discussion were:

- Definitions of accessible housing – no consistency.
- Need to encourage private developers to build more accessible housing and get evidence to support this.
- Role of planning in setting targets for wheelchair accessible housing.
- Legislative change needed at national level.
- Competing priorities on sites – difficult to meet all requirements on every site.
- Funding restraints.
- Futureproofing at design stage.

Following the summit, actions are being developed.

Adaptations to Council homes are funded through the Housing Revenue Account (HRA), with funding provided to RSLs through the Affordable Housing Supply Programme. The Council has set a budget of £1m each year for private sector adaptation grants. Since 2013/14 the Council has invested £6.3 million on adapting 1,433 Council Homes. The Council's Scheme of Assistance also assists private owners with adaptations to their homes and in the last five years the Council has funded £6.9million of property adaptations.

Grant funding for adaptations to RSL homes is administered by the Council on behalf of the Scottish Government. Spend has been increasing in recent years and the budget in 2024/25 was maintained at the 2023/24 level despite an overall cut to the Affordable Housing Supply Programme allocation, from which Stage 3 adaptations are funded.

Adaptations for homeowners and private tenants' homes are supported by grant funding provided through the Council's Capital Budget Strategy. There is a statutory duty to provide grants of 80% or 100% for those living in the private sector, who are assessed as needing adaptations.

It is estimated that 16% of homes within Edinburgh have been adapted; 26% within the social rented sector, 17% in the owner-occupied sector and 9% in the private rented sector. This compares to an estimate of 15% of homes in Scotland overall. (SHCS 2022).

Many adaptations are carried out without the need for planning permission. In the last 10 years, Building Standards records indicate that there have been 971 applications for building warrants for adaptations.

Specialist groups

Key Workers

There is no legal test or universal definition of 'key workers' although this generally includes some or all of the following: health and social care workers; teachers and staff providing childcare; energy suppliers and wider public, private or third sector workers providing emergency or critical welfare; national infrastructure services including grocery shop and transport staff, and other key service industries without which there would be a significant impact such as the tourism and hospitality workforce.

Housing to 2040 recognised that many areas experience difficulty in attracting or retaining key workers, particularly in places where there is a lot of competition for housing. For Edinburgh, this is recognised in the Council's Strategic Workforce Plan 2024-27, which cites high housing costs as a barrier when attracting people to live and work in the city.

Data from the Office of National Statistics Key Workers Reference Table estimated that 89,000 people in Edinburgh (33.2% of the population) were in key worker roles in 2019. At present, Edinburgh does not have a standalone policy around key workers and their housing needs, although the provision of mid-market rent housing has been recognised as an important housing option for households who would fall within this broad categorisation. A consideration for the Proposed Plan is whether and how it can support different forms of housing tenure to address different housing needs.

Armed Forces Communities

Data from the 2022 Census shows that the City of Edinburgh has one of the lowest proportions of veterans, relative to population (2.6%).

City of Edinburgh Council adopted the Armed Forces Covenant to support service personnel, veterans and their families. The Council also commissioned 85 bedspaces for veterans at Whiteford house, in the Canongate area, as a registered housing support service provided by Scottish Veterans Residences for former members of the UK Armed Forces who are homeless or at risk of homelessness.

Homes for larger families

The LHS notes that there continues to be significant demand for ground floor, larger family homes and increased demand for 4-bed plus homes. Current figures show that there are 405 homeless households who require a property of four bedrooms or larger. The Council's Housing Emergency Action Plan sets out an action to develop and implement a plan to ensure that larger (3+ bedroom) affordable homes might be increased.

NPF4 Policy 16 Quality homes supports development proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision which could include a range of size of homes such as those for larger families.

City Plan Policy Hou 3 Mixed Communities contains a requirement for the provision of a minimum of 20% of units suitable for larger families where 12 or more units are provided.

Recent completions data show that the largest proportion of new housing has been 2 bed properties - 43%.

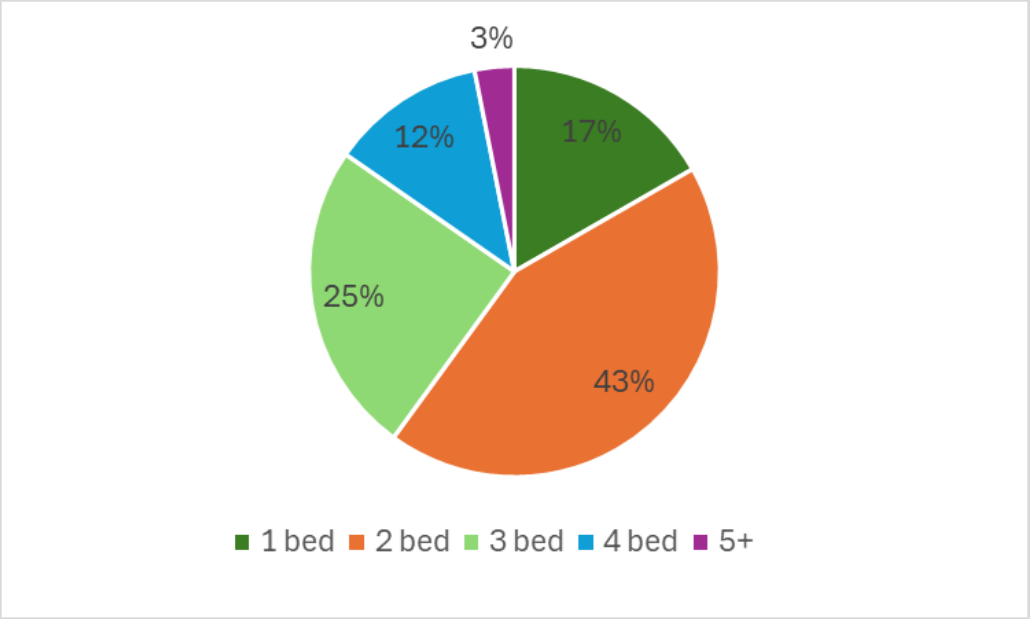


Figure 13.11: Completions 2019-2025 by number of bedrooms (source: CEC Housing Monitor)

67% of new dwellings in the period 2019-2025 were flatted properties.

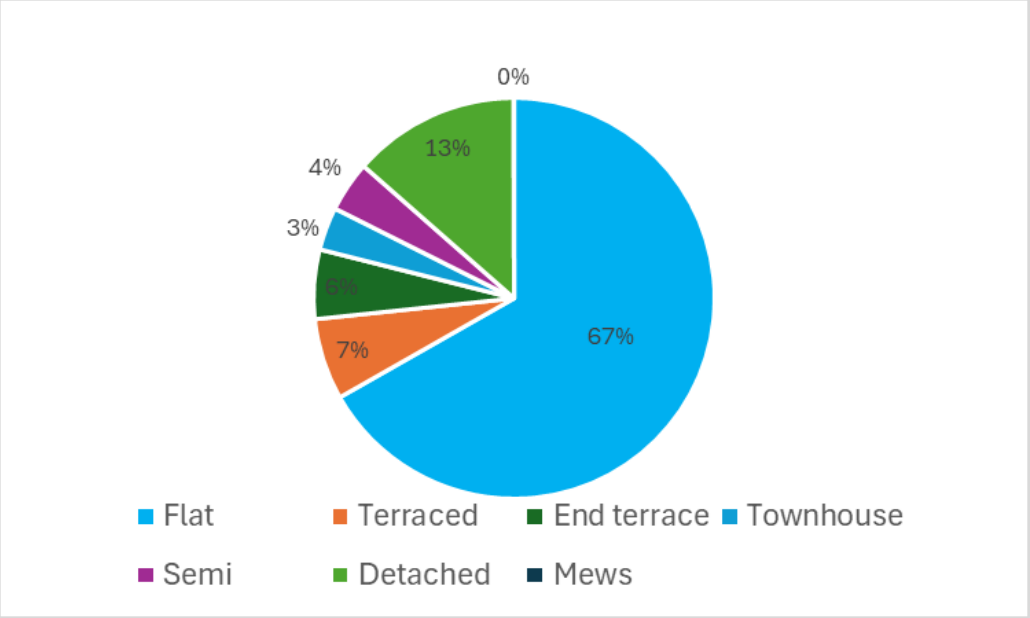


Figure 13.12: Completions 2019-2025 by dwelling type (source: CEC Housing Monitor)

Over 66% of the homes delivered through the AHSP over the five years from 2018/19 – 2022/23 were 2-bedroom properties. One-bedroom homes formed around 30% and a small number of 3+-bedroom properties were built.

The Place-based engagement with the general public asked people what they thought about their homes. People were generally happy but having a bigger place was cited as the thing that they would like to change. The Place and Play engagement with children and young people also asked what they thought about their homes and again, they were generally happy but having their own bedroom or a bigger place were the biggest changes they wanted. This engagement supports the data and the fact that there is some over-crowding of homes particularly in certain places. The Place Profiles provide a ward-based analysis of homes and whether they are meeting the needs of the local community.

Build to rent (BTR)

BTR differs from traditional homes (built for sale) in a number of ways. It can be characterised by:

- Single institutional ownership and professional on-site management of the entire development
- Individual units are self-contained and separately let
- Resident access to shared, communal facilities and on-site amenities integrated as part of the development

Developments in the sector have different economics from build for sale as financing is longer-term, relying on a stable rental income stream. The pace of delivery of new

homes is likely to be quicker than build for sale, since units are not sold to individual buyers at a constrained sales rate.

Housing to 2040 identifies investment in build to rent in the private sector, with an emphasis on the delivery of homes at the affordable end of market rates as vital to the delivery of Housing to 2040.

Scotland's devolved Land and Buildings Transactions Tax (LBTT) aims to support the delivery of new affordable homes throughout the country, encourage the emergence of the Build to Rent sector and support homeownership.

NPF4 Policy 16 supports build to rent where it improves affordability and choice by being adaptable to changing and diverse needs, and which addresses identified gaps in provision. Scottish Government Planning Delivery Advice, September 2017 encourages the development of build to rent and a positive approach to BTR developments should be taken to expand housing delivery.

Advice also recognises that BTR is a means of supporting key economic sectors and can also support labour market mobility by providing homes for people moving into areas for work.

Advice identifies a range of opportunities from BTR:

- Delivery of housing at pace and scale
- Design quality
- BTR can act as a catalyst for larger development sites due to the rapid speed of delivery of both housing and amenity.
- City centre brownfield sites with access to a wide range of facilities can be particularly attractive for BTR investment. Efficient use of existing facilities and amenities can help to support the creation of vibrant and sustainable urban communities.

It is advised that consideration should be given to developer contributions sought and any potential for a tailored approach, for example through phased payments, which is justified by the characteristics of the BTR sector and the individual development as the long-term, revenue-focused interests of the developer/investors in the site can present challenges in relation to development viability, where upfront investment is required to meet planning obligations.

The key differences from other traditional forms of housing which are important to consider in relation to BTR are typically the inclusion of on-site shared facilities and design features such as open plan residential layouts used to increase the proportion of usable space within a unit and large glazing to maximise natural light levels. As a result of these characteristics, a flexible approach to relevant elements of design may be justified. In particular the above differences suggest the need for

consideration of flexibility in relation to density, minimum space standards and single aspect units where the overall quality of the development remains appropriate.

BTR can bring institutional investment to the city and secure affordable housing without the need for grant subsidy through the delivery of intermediate rent homes.

In January 2019, the Council's Housing and Economy Committee noted the opportunity that BTR provides to accelerate housing development, support placemaking, increase housing choice and improve customer experience of renting housing in the private sector. In January 2020 the Council agreed an approach to securing affordable housing in build to rent developments. There have been 880 approvals for intermediate rent since this time. There were 116 BTR completions in 2024/25. Discussions with BTR developers, operators and investors are ongoing to support delivery of the current pipeline and identify further affordable BTR homes that can be delivered without grant funding. There are 12 BTR developments included within the SHIP 2025-2030.

The BTR sector faces similar challenges to other house building sectors, including increased construction costs, however the impact of increased interest rates is higher as much longer-term borrowing is required in comparison to properties built for sale. The Build to Rent In Scotland 2024 market review report by Rettie & Co (Nov 2024), states investment in BTR in Scotland has been limited in comparison to other parts of the UK.

The Housing Scotland Act November 2025 exempts BTR from any rent control areas which may be implemented by local authorities.

Co-living

Co-living is a form of build to rent housing. Unlike self-contained accommodation which comes complete with its own private kitchen and living area, within co-living schemes, these facilities are shared amongst residents of the scheme. The market for co-living is generally 18 - 45 year olds. Co-living schemes have also proved popular with students. Building Homes, Supporting Urban Regeneration and Fostering Communities through Co-Living, Conscious Co-living, July 2025 reports that students account for between 7% - 25% of occupants within UK developments depending on location.

While co-living developments have been a feature in cities such as London and Manchester, it is not an established market in Edinburgh. A report from Ryden in December 2023, How Co-living Could Get a Foothold In Scotland, stated that Edinburgh has the right demographics and economies to make co-living an appealing residential sub-sector due to high levels of graduate retention, constrained supply of residential letting accommodation and a high proportion of financial and tech sector employers. Reflecting interest from developers, potential impacts on users and surrounding neighbourhoods, Glasgow City Council developed

supplementary guidance in 2024 to provide a framework for assessment of co-living development.

According to Knight Frank's The Co-Living Report 2024, rents are on average 7% lower than the private rented sector (PRS) and 14% lower than BTR when accounting for included costs. A lack of planning guidance is cited as a reason that this form of accommodation is not being brought forward as quickly as it may otherwise.

NPF4 does not refer to co-living in particular but supports BTR. With no definition it will be important to differentiate co-living from other shared forms of accommodation.

Houses in multiple occupation (HMO)

The Scottish Government's Planning Advice Note 2/2012 identifies that HMOs provide a vital source of accommodation, and planning authorities should seek to ensure that an adequate supply is available to meet demand. Demand for HMOs should be met where it arises, and local authorities should consider HMOs when developing local housing strategies and development plans.

There is no definition of a HMO in planning legislation. For the purposes of licensing, Part 5 of the Housing (Scotland) Act 2006, as amended, defines that living accommodation is a HMO within the meaning of the Act if it is occupied by three or more persons from three or more families, and occupied by them as their only or main residence or in some other manner specified by the Scottish Ministers by order, and either a house, premises or a group of premises owned by the same person with shared basic amenities, or some other type of accommodation specified by the Scottish Ministers by order.

However, The Town and Country Planning (Use Classes) (Scotland) Order 1997 defines a house (Class 9) as being the sole or main residence of a single person, or any number of persons living together as a family, or not more than five residents living together as a single household. As with houses, the Council would also expect a material change of use to occur in flats when more than five unrelated people share accommodation. All planning applications for Houses in Multiple Occupancy (HMOs) are assessed using City Plan 2030 LDP Policy Hou 6 Inappropriate Uses in Residential Areas. This policy does not permit developments, including change of use, which would have a materially detrimental effect on the living conditions of nearby residents.

The Scottish Government's Planning Advice Note 2/2012 recognises that this kind of accommodation can give rise to amenity impacts for neighbouring residents and sets out guidance on the provision and management of houses in multiple occupation through the planning system.

It highlights that planning authorities may wish to adopt policies to limit HMO concentrations, where the residential amenity of a community is already adversely

affected by high concentrations of HMOs, or in areas where it is likely that this may happen in the future. Within Edinburgh, there is currently no planning restriction on numbers of HMOs. The Council's Guidance for Businesses provides planning guidance on the suitability of HMOs.

Scottish Government publishes statistics on HMOs in each local authority area. The data set out in Scottish Housing Statistics HMOs shows that there has been an overall increase in the number of licences in force in Edinburgh over the last 10 years.

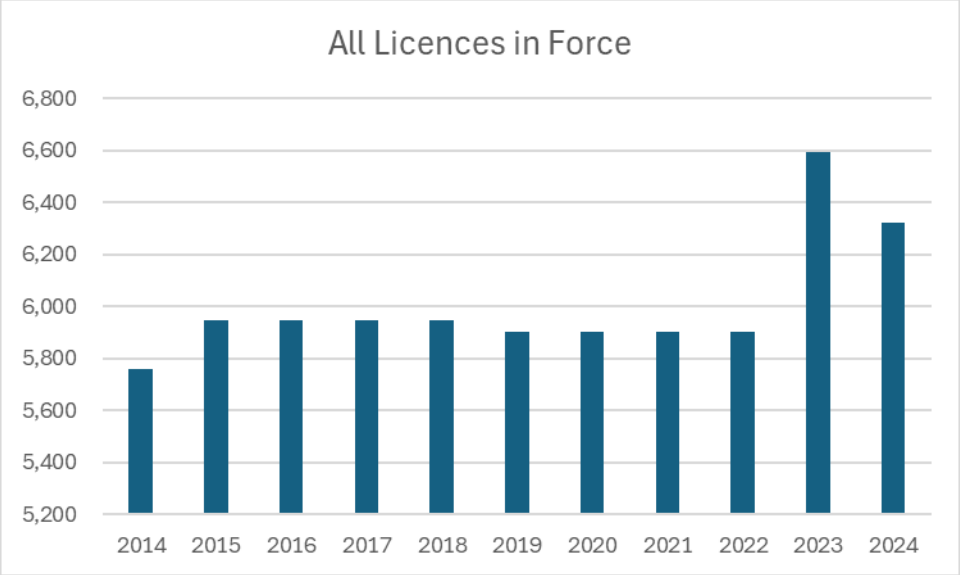


Figure 13.13: HMO licences in Edinburgh 2014-2024 (source: Scottish Government Housing Statistics May 2025)

Whilst since 2014, the number of new licences granted in Edinburgh each year had been a relatively consistent figure but there was a sizeable increase in 2023 and then this fell back in 2024. In 2024 there were 6,325 licences in force - almost 10% of all registered private rented homes in Edinburgh.

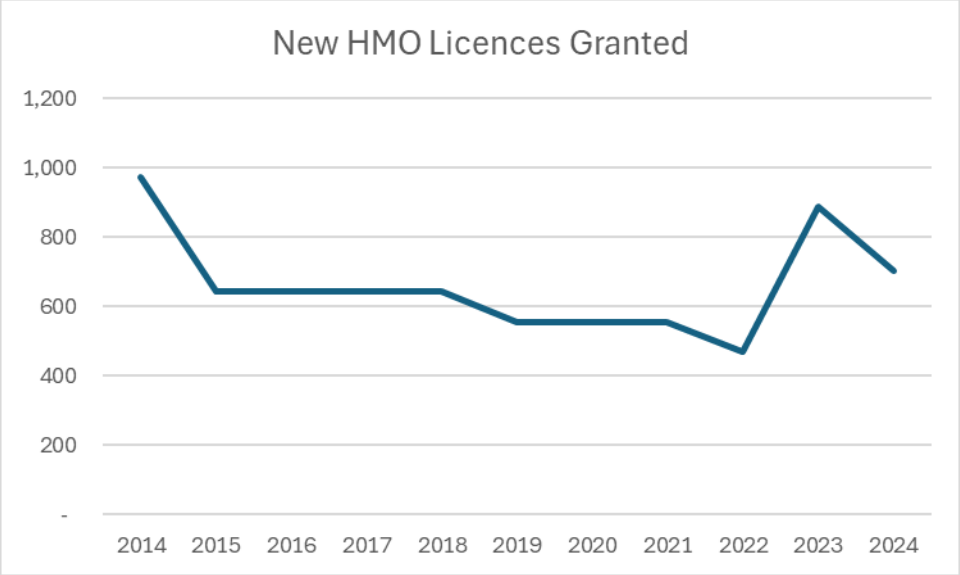


Figure 13.14: New HMO licenses granted (source: Scottish Government Housing Statistics May 2025)

The majority of licences in Edinburgh are for flats/houses let as a whole.

Licence Type 2024	Number
Landlord with lodgers	80
Bed-sits	2
Flats or houses to let as a whole	6,094
Nurses Homes	1
Student Halls of Residence	80
B&Bs, Hotels & Guesthouses	34
Hostels (LA & Charity)	34

Figure 13.15: HMO licence by type (source: Scottish Government Housing Statistics, May 2025)

Housing Needs of Gypsy/Travellers and Travelling Showpeople

Gypsy/Travellers are recognised as a distinct ethnic group. The population in Scotland includes a range of communities who regard a travelling lifestyle as an important part of their identity, some of whom travel all year round while others maintain a permanent base on a site or in housing. Travelling communities in Scotland are not a single group. There are many different groups. Each is defined by its different history, culture and lifestyle. While each group is made up of extensive family networks, these may have little or no connection with other Traveller groups.

Gypsy/ Gypsy Travellers are defined in the Planning (Scotland) Act 2019. For the purposes of section 16B of the Act "Gypsies and Travellers" means persons, whatever their race or origin, who are:

> (a) of or from a nomadic cultural tradition including—
> (i) members of Gypsy, Romany and Traveller ethnic groups including Roma Gypsies, Scottish Gypsy Travellers and Irish Travellers,
> (ii) persons who have ceased to travel temporarily or permanently,
> (b) members of an organised group of Travelling Showpeople or circus people (whether or not travelling together as such).

Since 2011, the Scottish Census has identified Gypsy/Travellers as a distinct ethnic group. The 2022 Census included the addition of categories for showman/ showwoman and Roma. These changes mean that the data for Gypsy/Travellers are not fully comparable with data from the 2011 census. Gypsy/Travellers in Scotland: an analysis of Scotland's Census 2022 provides analysis of Census 2022 data on Gypsy/Traveller demographics. A total of 3,343 respondents self-identified as Gypsy/Travellers in Scotland's Census 2022, representing 0.06% of the population. In Edinburgh there were 256 respondents that identified as Gypsy/Travellers.

Census results show that in 2022 the Gypsy/Traveller population was younger than the rest of Scotland. There was a higher proportion of people in age groups younger than 50 for the Gypsy/Traveller population, when comparing to the rest of Scotland. The biggest difference in age is recorded for those aged 65 and over, where 10.0% of Gypsy/Travellers are over 65 compared to 20.1% across the rest of Scotland.

The most commonly lived in type of accommodation for Gypsy/Travellers were flats, maisonettes or apartments. A higher percentage of Gypsy/Travellers reported living in this type of accommodation in comparison to the rest of Scotland (38.4% compared to 27.6%). About half of Gypsy/Travellers (49.8%) lived in accommodation that was socially rented from Councils or Housing Associations/Registered Social Landlords. This is a higher proportion than the rest of Scotland, of which about a fifth lived in this type of accommodation (20.3%). A higher percentage of Gypsy/ Travellers reported living in privately rented accommodations than the rest of Scotland (20.5% compared to 12.4%).

Overall, the proportion of Gypsy/Travellers that reported a limiting long-term health condition or disability was higher than the rest of Scotland. Nearly a quarter (23.4%) of Gypsy/Travellers reported being limited a lot while 16.2% reported being limited a little. This is higher than the rest of Scotland where about 10.8% reported being limited a lot and about 13.3% reported being limited a little.

It is considered likely that the figures are a significant underestimate and that population size in Scotland could be much higher, the lower Census figures being influenced by the mobile lifestyle of the community, fear of discrimination or disconnect.

Whilst acknowledging that the Gypsy/Traveller community is diverse, within Edinburgh communities can be broadly characterised as:

- Those that permanently reside in traditional ‘bricks and mortar’ accommodation.
- Those that live permanently on the site at North Cairntow. These residents have Scottish Secure Tenancies following the recent re-development of the site.
- Those that have permanent homes within Travelling Sites (both private and local authority) or traditional ‘bricks and mortar’ accommodation in other parts of the country. Choosing to travel through the summer months to Edinburgh and other regions for economic reasons. These groups are the main occupants of unauthorised encampments in Edinburgh.
- Those that permanently live on the roadside within Edinburgh and have no permanent place to locate to. They spend a few weeks in one site, before being moved on (usually by a private landowner) to another site in a cycle that continues throughout the year.

An Action Plan for Gypsy/Travellers- Improving the lives of Gypsy/Travellers – Action Plan 2019-21 was published in 2019 setting out five areas of commitment to:

- Provide more and better accommodation
- Improve access to public services
- Better incomes in and out of work
- Tackle racism and discrimination
- Improve Gyspy/Traveller representation.

It also committed the Scottish Government to providing additional capital investment in public sector Gypsy/Traveller sites which is being provided by the Gypsy/Traveller Accommodation Fund. A review of the action plan shows that while progress has been made, work continues to be required in areas including accommodation.

Improving the Lives of Scotland's Gypsy/Travellers 2 | Action Plan 2024 - 2026 was published in September 2024 to address points raised in the review. These include:

- Need for more accommodation with more sites and increased pitch numbers, including transit pitches where needed
- Need for better accommodation and an improvement in standards
- Need for more choice - recognising there are different accommodation needs and preferences throughout communities including council/housing association run sites, houses, private yards, transit sites and stopping places
- Need for better communication/understanding around planning and the issues communities wish to address through planning.

An Interim Site Design Guide for Gypsy/Traveller sites, was published by the Scottish Government in December 2021. New sites or major redevelopments of existing sites should be in line with this guide. An independent evaluation of the Fund and Design Guide is under way. This will gather the key points of learning from the demonstration projects to inform future projects, a final Site Design Guide and policy on Gypsy/Traveller accommodation.

There are minimum standards for Gypsy/Traveller Sites published in 2015. These set out the minimum standards for public sites, covering things such as safety, maintenance, repairs and facilities. While these were welcomed, the engagement highlighted that the these could mean a reduction in pitch numbers to meet the standards. During engagement, the need for separate toilets blocks for men and women and double pitches, as most families have 2 vans with one for older children, were highlighted.

The Scottish Government Evidence Review: Accommodation Needs of Gypsy/Travellers 2020 provides a review of literature on the accommodation needs and experiences of Gypsy/Travellers in Scotland. The review concludes:

- One-size fits all approach to accommodation is not appropriate.
- Accommodation needs are likely to change over an individual's life course.

- There is limited available evidence on the current population, specific accommodation. aspirations and travel patterns of Gypsy/Travellers in Scotland.
- There is no agreed methodology for understanding Gypsy/Traveller accommodation needs.
- Accommodation preferences of Gypsy/Travellers are diverse, and influenced by a number of factors, including privacy, proximity to family, access to services and health considerations.
- Ways of engaging Gypsy/Travellers in the research planning, design and implementation of accommodation needs assessments, should be considered carefully, including ways of reaching households in conventional housing.
- Partnership and sub-regional working are crucial to the completion of robust Gypsy/Traveller needs assessments.
- Poor quality of sites continues to be a major issue for many Gypsy/Travellers on local authority/RSL sites.
- Failure to meet the accommodation needs of Gypsy/Travellers is a key factor in the discrimination that they face.
- Opposition from the settled community continues to present a significant barrier to further site provision.

A Scottish Government Gypsy/Traveller Accommodation Fund is providing up to £20 million to local authorities, between 2021 to 2026, for more and better accommodation. City of Edinburgh Council received £90,660 of Scottish Government Funding as part of the joint action plan 'Improving the lives of Gypsy/Travellers: 2019-2021' to improve its site at North Cairntow. The cost of the re-development of the site was around £3,844,733 and met from the HRA Capital Budget, alongside the Scottish Government funding.

Existing permanent site provision

A private or socially rented site for permanent occupation typically provides a long-term permanent accommodation option with facilities provided on-site (although residents may spend regular or extended periods away from the site to facilitate a nomadic way of life).

Scottish Government's research report Gypsy/Traveller Sites in Scotland 2018 provides the most up-to-date data on the numbers of Gypsy/Traveller sites both public and private across Scotland. For 2018, data returns identified a total of 54 sites across Scotland, comprising 25 private sites and 29 public sites providing a total of 613 pitches. The 29 public sites were providing a total of 397 active pitches. This represented a reduction of public site provision of 62 pitches between 2008 – 2018, representing a fall of -14%. The majority of pitches were let on a permanent basis.

The 25 active private sites provided a total of 216 pitches. Most of the local authority areas with private site provision are relatively rural in nature, with the majority of private site provision in the central and east of Scotland. Around 91% are let on a permanent basis.

Within South East Scotland, there were 6 sites providing 84 pitches in 2018. Since this time, the pitch shared between Midlothian Council and East Lothian Council closed in June 2021 reducing the number of sites to 5 and pitches to 76. Occupancy ranged from 70%-90% with all sites holding a waiting list and most pitches had been occupied for over two years.

	Number of sites	Active pitches	Occupancy	Current Waiting list	Tenancy over 2 years
Edinburgh	1	20	90%	7	13
Midlothian	0	0	0		0
East Lothian*	1	8	63%	0	4
West Lothian	0	0	0		0
Fife	3	46	87%	16	26
Scottish Borders**	1	10**	70%	3	0
Total	**6**	**84**			

Figure 13.16: Gypsy/Traveller sites in South East Scotland (source: Gypsy/Traveller Sites in Scotland, 2018)

* Shared with Midlothian
** Seasonal April-October

Within the South East Scotland local authorities, there are a total of 6 sites with only Fife having private sites. These 6 sites account for 62 pitches which are allocated on a permanent basis.

There is a preference for private sites amongst Gypsy/Traveller communities which was referred to in the Scottish Government Evidence Review 2020. Reasons for this preference are varied but include the need to maintain control over choice of accommodation, privacy, avoidance of disruption from other families and ability to pass on sites to children.

The Council currently owns and manages one site in Edinburgh, known as the North Cairntow Travellers Site located south of Duddingston. The site was established in 1984. The Housing and Homelessness service has recently completely re-developed this site, with the old one being demolished. The new site opened in December 2022. The re-development involved a comprehensive programme of community engagement and consultation with residents and architects to co-design the improved site. It now features ‘top of the range’ prefabricated chalets that comply

with modern building standards, with additional external utility blocks on each pitch. The site provides 20 premium holiday style chalets.

All are currently let. Leases vary between 2 years and 20 years. Residents now have a Scottish Secure Tenancy Agreement, providing greater security of tenure and increasing rights. This was a tailored agreement which acknowledged and respected the community's culture with an allowance built-in for set periods of travel throughout the year, in line with cultural traditions.

Transient Sites

Transient sites are established by Local authorities for temporary use by Gypsy/Travellers. They are usually available for 28 days to 3 months. Facilities generally include a utility block inclusive of toilets and refuse collection.

Gypsy/Travellers have a long-standing presence in Edinburgh and the Lothians and Scottish Travellers and Romani Gypsies have long been part of Edinburgh's social and cultural fabric. Locations such as Gypsy Brae hold heritage value as historic stopping places. Despite this, Edinburgh currently lacks a dedicated transient site, leading to recurring unauthorised encampments and tensions with settled communities.

Community members reported that the land available for them to stop on is reducing year on year, due to a combination of land being developed and landowners taking measures to prevent access. Many of the traditional stopping places are no longer accessible and often leads to Gypsy/Traveller families stopping in places they would not ordinarily choose.

Sites for Travelling Showpeople

Travelling Showpeople are a distinct community of business owners managing fairground rides and attractions. Historically, Travelling Showpeople moved around the country, usually between March and October, attending fairs and living in caravans on the fairgrounds, and then in the winter months, on secured permanent bases for the storage of equipment and residential purposes. Such sites tend to be privately owned compared to Gypsy/Travellers who rely on public sites.

The Scottish Showmen's Guild indicates 400 member businesses, totalling over 2,000 Showpeople in Scotland. It also suggests that around 80% of these are based in the Glasgow area when not operating. The figure for South East Scotland cannot be assessed with any accuracy due to the lack of information on Travelling Showpeople, and whilst local knowledge suggests a site in Craigmillar, there is no definite information on sites in Edinburgh. However, The Scottish Showmen's Guild as a stakeholder has been contacted as part of the scoping for the Evidence Report.

As part of the consultation on HNDA3 it was noted that 'Travelling Showpeople have faced forced relocations and the segmentation of Showmen's Yards in areas of multiple deprivation. Many are routinely denied permanent planning status despite the vast majority of Showpeople residing in permanent sites. Suggestions include the introduction of special provisions for the sale of individual plots and community

owned sites; and the introduction of ‘buffer’ zones, providing special planning status where Showpeople could own yards which straddle residential and business use.’

Identifying need

The Scottish Government Evidence Review 2020 found that ‘there is no agreed methodology for quantifying the need for different types of accommodation among the population, particularly when attempting to account for future demand and cultural differences within Gypsy/Traveller communities. Quantification is made more difficult by a lack of visibility and information on large sections of the community, particularly those living in housing and on unauthorised encampments. There are also difficulties around what constitutes need, taking into account the existence of unused or underused site provision, transit or stopping places, and variation in accommodation aspirations. Further, Gypsy/Travellers as a group cannot be considered homogenous and a “one-size fits all” approach is inappropriate. Therefore, different groups require responsive and flexible approaches to meet their specific needs and contexts.’

The Scottish Government have identified in the Improving the Lives of Scotland’s Gypsy/Travellers 2 | Action Plan 2024-2026 that they will commission research to create an Accommodation Needs Toolkit to help local authorities identify Gypsy/Traveller accommodation needs and include them in their Housing Needs and Demand Assessments (HNDA), Local Housing Strategies (LHS) and Development Plans.

The Edinburgh and South East Scotland Housing Need and Demand Assessment 3 considers the need and demand for the provision of sites for Gypsy/Travellers and Travelling Showpeople. It considers gaps and shortfalls in current/future provision. It identifies key issues for site provision but does not identify any evidenced need for sites. It highlights the difficulties in obtaining accurate data to inform a meaningful estimate of need and demand.

The following may provide indications of need/demand:

Public sites pitch occupancy

Gypsy/Traveller Sites in Scotland 2018 provides occupancy rates. Of the South East Scotland authorities, City of Edinburgh had the highest occupancy rate at 90%. In February 2024, the occupancy of Edinburgh’s pitches at North Cairntow was 100%.

	Active pitches	**Let pitches**	**Occupancy**
Edinburgh	20	18	90%
East Lothian & Midlothian (shared)	8	5	63%

Fife (West & Central)	30	23	77%
Scottish Borders	10	7	70%
South East Scotland	**84**		**78%**
Scotland	**397**	**351**	**88%**

Figure 13.17: Pitch Occupancy 2018 (source: Gypsy/Traveller Sites in Scotland, 2018)

Public sites waiting list

In 2018 there was a waiting list for 20 pitches across South East Scotland and 90 nationally. East Lothian Council and Midlothian Council's joint site was the only site with no waiting list. Although waiting lists can provide evidence of demand for site provision, the quality of sites, relationship between the site and potential tenants will both influence whether people join a waiting list. City of Edinburgh's experience is that Gypsy/Travellers generally only apply to sites where they have family members or relatives present. Therefore, the site at North Cairntow is mostly populated by tenants who are in some way related to each other. Unlike a waiting list for local authority housing, there is no consistent way for Gypsy/Travellers to indicate their need for a pitch(HNDA3). In September 2025 North Cairntow had a waiting list of 17, most of which have an existing connection to residents already living in the site.

Public sites likely turnover of pitches

The likely rate of turnover could indicate the potential future supply of pitches. In March 2025, North Cairntow was fully occupied and the view of the Site Manager and Roadside Encampment Liaison Officer was that there is unlikely to be turnover.

Unauthorised encampments

Unauthorised encampments are typically the result of Gypsy/Travellers stopping for a short period when travelling through or visiting an area. Encampments vary in size from small family groups (typically 1-2 vans) to larger groups of up to 20+ vans. Locations used also vary considerably and can include open ground in rural locations or within/adjacent to towns, industrial locations, and retail or business parks.

The Scottish Government Evidence Review 2020 highlights that some studies have suggested a correlation between a lack of appropriate site provision and traditional stopping places, and the number of unauthorised encampments. At present, there is no unified mechanism to record and monitor roadside encampments in Scotland. It is difficult to assess the extent to which data provides a comprehensive account of encampment activity. For example, anecdotal evidence indicates that local authorities are more likely to be made aware of larger encampments and/or those in more 'visible' locations, but that encampments in more remote rural areas may go unreported. This makes it difficult to draw meaningful conclusions between the

number of roadside encampments and the need for increased site provision. Whilst this might be an obvious association, some Gypsy/Travellers choose to live on roadside encampments when actively travelling to different areas. Gypsy Traveller Sites 2018 identified a total of 406 locations as being used for unauthorised Gypsy/ Traveller encampments over the previous 3 years, typically in and around small towns and urban areas.

HNDA3 identifies the number of roadside encampments reported by local authorities. The number in Edinburgh was extremely low in comparison to other areas at that time.

Table 5.47: Roadside encampments

	2017/18	2018/19	2019/20
City of Edinburgh	2	2	3
East Lothian	29	24	22
Fife (West & Central)	34	39	7
Midlothian	6	8	2
Scottish Borders	Not available	Not available	14
West Lothian	74	16	41
South East Scotland	**145**	**89**	**89**

Source: South East Scotland Local Authorities, 2021

Figure 13.18: Roadside Encampments (source: HNDA3)

However, Edinburgh experienced unprecedented levels of unauthorised encampments in 2024. This can perhaps be explained partly by the hosting of the Life and Light Mission at Hunter's Hall Park in Edinburgh. Increased numbers may also be explained by the recent Police, Crime, Sentencing and Courts Act 2022 (Police Act England) giving the police powers to move Gypsies and Travellers living on roadside camps in England. Anecdotal evidence suggest that other Scottish local authorities have not experienced greater numbers of unauthorised encampments this year. Again, it may be that Edinburgh is a more attractive option in terms of work opportunities.

Planning applications for private sites

Gypsy Traveller Sites 2018 identified a total of 88 planning applications for private Gypsy/Traveller sites across Scotland in the period 1992-2018. Most authorities received a relatively small number of planning applications however, a small number of authorities reported larger numbers of applications, most notably Aberdeenshire and Perth and Kinross.

HNDA 3 identifies that of the 88 planning applications that were submitted across Scotland,18% were in the South East Scotland area. Of the number of planning applications submitted, a higher percentage received approvals at the initial application stage in South East Scotland (75%) compared to Scotland (40%).

Table 5.41: Planning applications for private sites				
	Number Planning Apps	Initial applications approved	Approved on Appeal	Refused, withdrawn or pending
City of Edinburgh	0	0	0	0
East Lothian & Midlothian	2	1	1	0
Fife*	6	5	0	1
Midlothian	1	0	0	1
Scottish Borders	0	0	0	0
West Lothian	7	6	1	0
South East Scotland	**16**	**12**	**2**	**2**
Scotland	**88**	**35 (40%)**	**18 (20%)**	**35 (40%)**
Source: Gypsy/Traveller Site Provision, Scottish Government, 2018; Fife Council, 2021 *Includes all Fife				

Figure 13.19: Planning applications for private sites Gypsy/Travellers living in conventional housing

The 2022 Census identified that 93% of the Gypsy/Traveller population lived in some form of conventional housing. The Scottish Government Evidence Review 2020 identifies that while some Gypsy/Travellers do choose to live in 'bricks and mortar' housing by choice, many are forced to through lack of authorised sites or because the sites that are available are of poor quality and fail to meet their needs. This was reinforced through engagement on the Evidence Report. Other studies identified push and pull factors including a lack of space on existing sites; disputes with other families and official sites with unused pitches not being seen as a viable option. Changing factors such as employment or social care needs may lead Gypsy/Travellers to choose to live in settled accommodation.

Feedback from community

There are recognised difficulties in engaging with Gypsy/Travellers who are on the road or in roadside encampments to gain an understanding of housing needs. There was no primary research undertaken with the Gypsy/Traveller community in the preparation of HNDA3. A briefing paper prepared by MECOPP, who work to support the Gypsy/Traveller community, Gypsy/Traveller Accommodation Paper 3: A Capacity Crisis in Gypsy/Traveller Accommodation identifies concerns raised by members of the Gypsy/Traveller community in finding a place to call home. Part of the issue being a lack of access to social landlord sites and challenges in developing accommodation options privately. Discussions with members of community at the Light and Life Mission in 2025 highlighted the difficulty of obtaining planning consent for family-based sites.

In terms of permanent sites, the point was raised through engagement with MECOPP that North Cairntow has 20 pitches but there is no room for growth within that community. As families grow, they have to leave the area and live away from their community. The Gypsy/Traveller community has grown and there is a need to be able to expand existing sites or provide additional site within the same locality. The demographic information for the Gypsy/Traveller community suggests a younger population than the Edinburgh average which indicates that the community is likely to grow in the future. Further discussions with the North Cairntow community will be required for the Proposed Plan stage.

Engagement and through the local knowledge of the Council's Site Manager and Roadside Encampment Liaison Officer, there is a separate community currently moving between unauthorised sites within Edinburgh looking for a permanent site. This would need further exploration as part of the Proposed Plan stage.

Engagement suggested that the lack of transient sites 'forced' communities who are travelling to or moving through Edinburgh into unauthorised encampments with inadequate facilities which can lead to conflict. In addition, a lack of transient sites in Edinburgh was raised causing some Gypsy/Traveller Communities who wish to move continuously looking for more permanent sites.

Future provision

There is no provision within the Council's current HRA Capital Programme 2024/25 for Gypsy/Traveller accommodation. The Council's Strategic Housing Investment Plan 2025-2030 sets out priorities for affordable housing. The SHIP does not identify any future pipeline of Gypsy/Traveller sites.

Locations for Gypsy/Travellers Sites

The Scottish Government Evidence Review 2020 found that the location of any new provision was a key factor in assessing need. Gypsy/Travellers have often not been able to access culturally appropriate sites in the areas they wish to live and enforcement activity may have distorted where they have settled.

The Scottish Government's Interim Site Design Guide for Gypsy/Traveller Sites in Scotland identifies the following key aspects to consider when identifying suitable locations:

- Roads and access: safe and easy access for vehicles is important.
- Water, sewage, electricity and digital connectivity: sites need to be able to be supplied with all the essential services.
- Access to public services and amenities: the site should provide good access to public transport, schools, health services, shops and other community facilities.
- Communal recreation and play areas should be provided.
- Impact on amenity
- Character and appearance

When considering the above aspects, potential locations for Gypsy/Traveller sites should generally be considered inappropriate if they would be unsuitable for other residential developments. Engagement with Minority Ethnic Carers of Older People Project (MECOPP) suggested that the Gypsy/Traveller community was offered sites which did not provide an appropriate level of amenity.

The literature suggests that Gypsy/Travellers prefer sites that strike a balance between access to local urban centres and some degree of seclusion, with access to public transport, shops, health services and education identified as key drivers of satisfaction (Craigforth 2007). This was also a view expressed during engagement

on the Evidence Report and that remote/unconnected locations mean many Gypsy/Travellers have to move to settled accommodation to access services.

Meeting specific needs within the Gypsy/Traveller community

The Scottish Government Evidence Review 2020 highlighted a study which looked at the accommodation experiences of older Gypsy/Travellers which emphasised the need for flexibility in accommodation provision. Given the identified higher levels of health conditions and disability within the population, as Gypsy/Travellers get older, for many the frequency of travel also declines often resulting in a move into 'bricks and mortar' accommodation.

Evidence from Scotland and the UK has attributed a lack of access to culturally appropriate housing as a major contributory factor in the poor health, educational and societal outcomes experienced by Gypsy/Travellers. Challenges with adaptations exist for disabled Gypsy/Travellers, as sometimes static caravans and chalets are classed as unsuitable or ineligible for adaptation. Some Gypsy/Travellers are therefore forced into mainstream housing as a result of ill health or disability or the need to care for an ill or disabled relative. Gypsy/Travellers moving into mainstream housing have reported a loss of cultural identity and isolation, which is known to be detrimental for their mental health and wellbeing (MECOPP).

Scottish Government's Interim Site Design Guide for Gypsy/Traveller Sites in Scotland requires that as a minimum, newly designed pitches and amenity blocks will be expected to meet the relevant basic requirements of the design criteria for dwellings in general to suit varying needs specified in Housing for Varying Needs. In order to meet the needs of a range of residents over time, a proportion of new or refurbished accommodation should be configured to meet the needs of older and ambulant disabled people. Guidance advises that like mainstream social housing, local authorities should assess the needs for their area. Reflecting on the 2011 census which reported that Gypsy/Travellers are more likely to have a long-term health problem or disability, the guidance indicates the level of provision may need to be higher than for the settled community. Providing accommodation with full wheelchair accessibility should be considered in accordance with identified need for a specific tenant. The pitch and amenity block should be designed for full wheelchair accessibility meeting the relevant design criteria within Housing for Varying Needs.

Summary of the action taken to meet the needs of Gypsy/Travellers

There are no site specific allocations made for Gypsy/Traveller or Travelling Showpeople sites in the adopted City Plan 2030. City Plan 2030 continues the policy of the Edinburgh Local Development Plan 2016 (Hou 9).

Within City Plan 2030, Policy Hou 7 Sites for Gypsy/Travellers and Travelling Showpeople supports the development of a site for caravans for Gypsy/Travellers and Travelling Showpeople provided:

a. it has been demonstrated that a site is needed in the location proposed,

b. the site would not detract from the character and appearance of the area,

c. the site would not detract from the amenity currently enjoyed by residents in the area,

d. the site can be adequately screened and secured and provided with essential services and,

e. it has been demonstrated that the site will be properly managed.

Criteria based approach provides a framework to consider proposals should there be evidence of need. In the period since 2016, Policy Hou 7 has been applied to one application and this was for the redevelopment of the Council owned and managed site at North Cairntow.

The Proposed Plan should explore the appropriateness of the wording of the policy and its effectiveness in supporting the delivery of public and particularly private sites.

North Cairntow, as Edinburgh's only site, is complete but work is continuing to support the community. Council officers have been working with Edinburgh Tenants Federation (ETF), supporting the community to set up a Registered Tenants Organisation (RTO), which would enable access to wider funding. The on-site Community Hub programme is used by the community and a variety of partners and external agencies. The Cyrenians, in partnership with Minority Ethnic Carers of Older People Project (MECOPP), deliver a thriving surplus food hub, providing good quality food that otherwise would have been sent to landfill. MECOPP also deliver nutritional and active lifestyle advice sessions. Community Education colleagues are planning to deliver literacy support to the community. Similarly, MECOPP are engaging with the Education Department to explore the provision of support to school aged children. Income Maximisation surgeries have been held on site to provide access to financial advice and to identify underlying benefit entitlement.

The benefits of a permanent site are evident and this is reflected in the fact that it is fully let. However, consideration needs to be given as to whether there is scope to extend the site to support a growing community. In addition, it needs to be explored as to whether any other permanent sites are required within the city to address need and demand.

A Site and Roadside Encampment Manager is based at North Cairntow and is the first point of contact for residents, providing support to access additional Council and external services. The role also supports colleagues across the Council to implement a consistent approach to unauthorised encampments. The role is to ensure that the Scottish Government's Management of Unauthorised Encampment Guidelines, are put into practice and to co-ordinate the Council's response to Roadside Encampments, balancing the management of roadside encampments with the identified needs of those residing in these encampments.

Given the on-going challenges of unauthorised encampments for both the Gypsy/Traveller communities and the surrounding residents, it is important

consideration is given to providing a transient site within Edinburgh with appropriate facilities.

Summary of stakeholder engagement

Key Stakeholder	Homes for Scotland
Main views raised	• **Scoping (May 2025):** Potential alternative tenures and models of delivery should be covered
Council response and implications for the proposed plan	The topic paper covers a range of alternative tenures but it is outwith the scope of the Evidence Report to outline possible delivery models.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other engagement and matters raised

Scoping (May 2025):

The Watkins Jones group commented that the benefits of BTR should be recognised and planned for positively, should assess the benefit of discount market rent and assess the need for co-living and policies to secure its delivery.

The paper does cover BTR and Co-living and the Proposed Plan will explore whether planning policies can secure their delivery.

The Scottish Showmen's Guild was contacted. No response received.

Draft Topic Papers (Nov 2025):

The Scottish Showmen's Guild was contacted with regards to reviewing relevant topic papers. No response received.

Final Topic Papers (March 2026):

The Scottish Showmen's Guild was contacted with regards to reviewing the finalised topic papers. No response received.

There have been on-going discussions and liaison with the Housing and Homelessness service in the development of the Local Housing Strategy and its different elements. Planning will continue to collaborate with Housing and Homelessness and other stakeholder in helping to meet current and local demand for a range of housing needs.

There will also be on-going engagement with the Edinburgh IJB on the development of care homes and other supported accommodation for Edinburgh

There has been discussions with BTR developers, operators and investors and Planning will continue these discussions along with any other alternative tenure/ delivery model providers.

A Planning Officer attended the Lothian Gypsy/Roma Forum on 16 June 2025. A number of contacts and potential sources of evidence were put forward at the meeting. A lack of temporary sites in Edinburgh was raised as an issue for healthcare and education. A contact was provided for the Roma community, gypsy/traveller community in Edinburgh and MECOPP.

A number of in-person and on-line discussions with the Council's Traveller Site Manager and Roadside Encampment Liaison Officer and a Police Constable from the Prevention, Intervention and Partnerships Divisional Coordination Unit in Police Scotland. Their experience and relationship with the different Gypsy/Traveller communities established in Edinburgh was an important source of information. Engagement and working collaboratively with Housing and Homelessness will continue through the development of the Proposed Plan.

In-person discussion on 23 June 2025 with members of different Gypsy/Traveller families who were pitch on an unauthorised encampment. This highlighted the importance of transient with proper facilities which was particularly important for girls and young women.

Planning attended the Light and Life event at Hunter's Hall in Craigmillar on 30 June 2025. It was an opportunity to talk to the pastor and a number of people from Scotland and also rest of the UK. It was an opportunity to discuss the difficulty of finding appropriate settled sites and achieving planning consent.

There was an on-line meeting on 27 August 2025 with Virginia Francis, Community Health Team Leader within MECOPP (Minority Ethnic Carers of People Project) who is also a member of the Gypsy and Traveller community who provided an insight into the settled gypsy community and its needs. In particular, this discussion highlighted the importance of permanent sites having space to grow to accommodate families and the cultural importance of staying within a family group. Also, the issue of offering sub-standard sites which did not provide adequate amenity was raised.

The Engagement Report in Appendix 1 of the Evidence Report provides more information on the engagement activity with the Gypsy and Traveller community but the key issues raised were:

- If there is no room to growth in the permanent site, it means that as families grow, they have to leave and live away from their community
- Lack of other permanent sites in Edinburgh for different communities that are looking to have a more permanent site in Edinburgh
- Lack of transient sites with the right facilities including adequate segregated toilet facilities. Communities were 'forced' into unauthorised encampments because there are no transient sites.
- Importance of being near local services and not in a poor location – sites need a good level of amenity.
- Planning will continue to engage with the Housing and Homelessness service with regards to the Gypsy/Traveller communities in terms of need and what provision may be required which the Proposed Plan can help to deliver.

Summary of implications for the proposed plan

- The Proposed Plan needs to recognise that access to a home that is in good condition and meets a household's specific needs is important for health and wellbeing and can be a factor in helping people out of poverty. The Proposed Plan will need to ensure a diverse range of housing to meet the needs of the population.
- Edinburgh's population is ageing and the number of people with disabilities is also increasing. There are also gaps in provision for people with particular challenges for example suitable housing for people with learning disabilities or living with dementia. The Proposed Plan will need to explore whether it can help to deliver affordable accessible and adaptable homes as well as specialist accommodation that support people with certain needs. This will require continued working with key partners and stakeholders including in the private sector to understand existing provision and needs as well as delivery.
- The evidence suggests that with the predicted demographic change, there will be more demand for health and care services including for care homes in Edinburgh. The Council will continue to work with stakeholders and developers to identify demand and the Proposed Plan will consider how it can support and help deliver new care homes in the right locations within the city

including in areas with under-provision provided they are part of an integrated and connected community.

- The Proposed Plan will consider how it can support a wide range of housing models and tenures including co-living, build for rent and mid-market rent as a means of meeting different housing needs and to provide a range of housing options that could help to attract and retain people living and working within Edinburgh.

- Whilst it is expected that household sizes are decreasing in size, there remains a need and demand for affordable larger family homes, particularly to help with over-crowding. The Proposed Plan will consider household size projections in terms of housing need and seek to ensure that an appropriate mix of housing size is delivered including homes for larger families.

- The Proposed Plan needs to help address the needs of the different Gypsy/Traveller communities within Edinburgh in terms of both public and private sites and look at ways to support the delivery of adequate transient facilities.

- The Proposed Plan will also need to consider the needs any potential Travelling Showpeople based within Edinburgh.

Statements of agreement/dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

14: Student accommodation

Topic	**14: Student accommodation**
Description of topic	Assessment of the housing needs of those undertaking further or higher education.
Information required by the Act	**Town and Country Planning (Scotland) (Act) 1997, as amended:** Section 15(5) • the housing needs of the population of the area, including in particular the needs of persons undertaking further and higher education, older people and disabled people;
Relevant NPF4 Policies	• Policy 16 Quality Homes
Local Development Plan Guidance	A place-based plan is expected to identify which allocations will help contribute to meeting specific needs including for further and higher education. The spatial strategy of the LDP must take account of the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people
Linked Topic Papers	Topic 13 Specialist housing and other accommodation
List of and links to evidence	• **CD033** City Plan 2030 Written Statement, City of Edinburgh Council, November 2024 • **CD432** Student Accommodation Report 2023, Cushman Wakefield, 2023 • **CD433** Student Accommodation Report 2025, Cushman Wakefield, 2025 • **CD538** Economic Impact of The University of Edinburgh, London Economics, 2023 • **CD043** Edinburgh Economic Needs Study: Visitor Accommodation, AR Hospitality Consulting (City of Edinburgh Council), May 2025 • **CD289** Edinburgh by Numbers 2024, City of Edinburgh Council, 2024 • **CD555** Household Projections for Scotland (2022-based): Methodology Guide, National Records of Scotland (NRS), December 2025 • **CD315** Housing Emergency Action Plan - Update, City of Edinburgh Council, June 2025

- **CD530** Student Accommodation Survey, Knight Frank, 2024
- **CD300** Edinburgh's Local Housing Strategy 2025-2030, City of Edinburgh Council, June 2025
- **CD262** City of Edinburgh Council's Local Housing Strategy Action Plan, City of Edinburgh Council, June 2025
- **CD541** London Plan Guidance Purpose-built Student Accommodation, Mayor of London, October 2024
- **CD071** Non Statutory Guidance - Student Accommodation, City of Edinburgh Council, September 2025
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023
- **CD237** Question reference: S6W-25244: Recommendations of PBSA Review Group, Scottish Parliament, February 2024
- **CD187** Purpose-built student accommodation (PBSA) and student housing in Scotland: research, Scottish Government, December 2022
- **CD196** Scotland's International Education Strategy, Scottish Government, February 2024
- **CD366** Student Accommodation Survey, City of Edinburgh Council, May 2025 – is this the link?: Print Survey - City of Edinburgh Council - Citizen Space
- **CD367** Student Homelessness Crisis Motion to City of Edinburgh Council, City of Edinburgh Council, June 2023
- **CD682** Student Housing Options and Experiences of Homelessness in Scotland, Cross-party Group on Housing, UK Collaborative Centre for Housing Evidence, September 2024
- **CD697** Student Living Report, University of Edinburgh, Edinburgh Napier University, Heriot-Watt University, Queen Margaret University, June 2025
- **CD230** Widening university access, Scottish Government, January 2026
- **CD528** Student Accommodation and the City Plan 2040 on Key Considerations for the Future Provision of Student Housing in Edinburgh, Joint University Response, April 2026
- **CD539** The benefits and costs of international higher education students to the UK economy: Analysis for the 2021-22 cohort , London Economics, May 2023
- **CD493** Table 1- HE Student enrolments by HE provider 2014/15 to 2024/25, Higher Education Statistics Agency (HESA)
- **CD491** Introduction Higher Education Statistics 2014/15 Table B, Higher Education Statistics Agency (HESA)

- **CD492** Introduction- Higher Education Statistics 2015/16 Table B, Higher Education Statistics Agency (HESA)
- **CD482** Figure 7- HE Student enrolments by HE provider and permanent address 2016/17, Higher Education Statistics Agency (HESA)
- **CD483** Figure 7- HE Student enrolments by HE provider and permanent address 2017/18, Higher Education Statistics Agency (HESA)
- **CD484** Figure 7- HE Student enrolments by HE provider and permanent address 2018/19, Higher Education Statistics Agency (HESA)
- **CD485** Figure 7- HE Student enrolments by HE provider and permanent address 2019/20, Higher Education Statistics Agency (HESA)
- **CD486** Figure 7- HE Student enrolments by HE provider and permanent address 2020/21, Higher Education Statistics Agency (HESA)
- **CD487** Figure 7- HE Student enrolments by HE provider and permanent address 2021/22, Higher Education Statistics Agency (HESA)
- **CD488** Figure 7- HE Student enrolments by HE provider and permanent address 2022/23, Higher Education Statistics Agency (HESA), August 2024
- **CD481** Figure 7 - HE student enrolments by HE provider and permanent address 2023/24, Higher Education Statistics Agency (HESA), March 2025
- **CD489** Figure 7- HE Student enrolments by HE provider and permanent address 2024/25, Higher Education Statistics Agency (HESA), January 2026
- **CD480** Figure 5 HE student enrolments by personal characteristics 2020/21 to 2024/25, Higher Education Statistics Agency (HESA), January 2026
- **CD494** Table 57 - Full-time HE student enrolments by HE provider and term-time accommodation 2014/15 to 2024/25, Higher Education Statistics Agency (HESA), January 2026
- **CD490** Higher Education Student Statistics: UK 2024/25, Higher Education Statistics Agency (HESA), January 2026
- **CD445** Our Capital, Our College, Edinburgh College, 2024

List of Matters Covered

This topic paper considers the following in relation to student accommodation:

- National context
- Local context
- Edinburgh's further and higher education institutions

- Students
  -Current numbers
  -Long-term trends
  -Overview
- Student accommodation-
  -Purpose-built student accommodation (PBSA)
  -Private rented sector (PRS)
- Cost and affordability
- Term time accommodation 2024/25
- Current need for student accommodation.
- Calculating current need
- Future need for student accommodation
- Summary of stakeholder engagement
- Implications for the proposed plan

Summary of evidence

National Context

National Planning Framework 4 (NPF4)

NPF4 Policy 16c) supports development proposals for new homes that improve affordability and choice by being adaptable to changing and diverse needs, and which address identified gaps in provision. This could include homes for people undertaking further and higher education.

Scotland's International Education Strategy, February 2024

The strategy recognises that international students, staff, and researchers have an overwhelmingly positive impact in Scotland bringing social and cultural diversity, enriching the overall learning experience, supporting local economies, businesses, and jobs and making a substantial contribution to the sustainability of universities.

It sets out an ambition to attract students, staff, and researchers from outside the UK and to help diversify the international student population.

Scottish Government Review of PBSA

In response to rapid expansion of Purpose Built Student Accommodation (PBSA), a review group was formed. To inform the work of the group, a research report Research on purpose-built student accommodation (PBSA) and student housing in Scotland, Scottish Government, December 2022 was prepared by the UK Collaborative Centre for Housing Evidence (CACHE). Key messages from the research were:

- student accommodation is a complex, interdependent system interacting with local housing systems and communities

- emerging strains from external shocks, such as the Covid-19 pandemic, internal processes, such as landlord retreat from student housing in the Homes in Multiple Occupation (HMO) private rented sector (PRS), and political risk from ongoing housing and educational policy developments
- private sector PBSA is market driven, which evokes a range of divergent perspectives and PBSA should be approached in a joined-up way
- new PBSA developments continue to move upmarket and, with the signalled decline of mainstream PRS, there needs to be a wider range of accommodation provision
- there is limited data on variations in student housing affordability
- sector needs robust and regular, data on students' economic circumstances and the affordability of different types of accommodation throughout Scotland.

The research also notes:

- gaps in the market provision due to a move towards up-market accommodation and a declining numbers of university halls
- more modest, but sufficient quality, mid-range PBSA supply is needed
- a shift in perspectives from PBSA being a solution to 'studentification' and poor quality private rented student accommodation, to becoming a key part of the problem of perceived new forms of neighbourhood dominance.

Eleven recommendations were considered by Ministers and accepted in full and announced in response to a parliamentary question in February 2024. The following recommendations are of particular relevance:

- national round table discussion with higher education institutions, private PBSA providers, investors/developers, students, and local authorities, to explore improvements in relation to ensuring the housing needs of students are met
- strategic partnerships to be established at local level, involving all those involved in provision / use of student accommodation to consider / address supply issues at local level in the short, medium, and long-term
- Scottish Government to work with partners to identify and address barriers to expanding the supply of affordable accommodation through e.g. the repurposing of existing buildings and the utilisation of alternative housing models e.g. housing co-operatives
- Scottish Government and higher education institutions to engage with property investors/developers in the private sector to encourage the development of a more diverse accommodation, which could meet the needs of families and those on lower incomes.

Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing, September 2024 considers the current shortage of student housing in Scotland, gaps in knowledge of the student housing market,

and the different forms of student housing that are available to students in Scotland. The report notes:

- lack of clarity whether students choose accommodation that meets their needs or if their choices are limited by availability and lack of knowledge
- pressures created by private landlords exiting the market while the provision of new PBSA continues to move upmarket have created affordability issues pointing to a need for more mid and lower-range PBSA
- students need a wider range of housing options, particularly more affordable tenures, and this is not currently being provided by the market
- Private Residential Tenancy regime and subsequent regulatory changes have significantly impacted the PRS, particularly in terms of landlord behaviour and availability of student housing.

The report also identifies a number of knowledge gaps:

- data on student demographics and their housing needs
- uncertainty in projecting student numbers, especially due to the volatile international student market
- significant gaps in reporting and monitoring student homelessness
- incomplete data on student housing market trends, especially regarding landlord behaviour, vacancy rates, and the impact of regulatory changes
- data gaps in relation to rent levels, student incomes, and the specific needs of different student groups
- limited data on the quality of student housing
- insufficient understanding of student housing choices which can affect housing decisions.

Local Context

Edinburgh's Housing Emergency

In June 2023, the City of Edinburgh Council passed a motion titled 'Student Homelessness Crisis', in which it recognised the scale of housing insecurity and homelessness among students in Edinburgh.

A housing emergency was declared in Edinburgh in November 2023 due to an increasing number of homeless households in the city, the number of households in temporary accommodation and the shortage of social rented homes. A housing emergency action plan has been developed which identifies the following actions directly related to student accommodation:

- work with universities and private rented sector to increase the availability of affordable housing for students and reduce risk of student homelessness
- explore potential ways for new co-operative housing ventures, such as student housing co-operatives, to be supported
- work with universities and student bodies to develop a more data driven approach to understand accommodation requirements based on courses and

curriculum on offer, existing student accommodation supply, and develop supporting policies focused on affordability and preventing homelessness.

Edinburgh's Local Housing Strategy 2025-30 (LHS)

The strategy sets out the vision for all types of housing and housing-related services in Edinburgh for the coming years. Challenges are identified for students in accessing accommodation mostly related to lack of availability, affordability and suitability of leases.

The associated LHS action plan sets out an action to:

- work with partners to review and support housing options information and advice for university students and prospective students.

LHS engagement with students identified a recurring theme around the challenges of finding and securing suitable private rented accommodation that is affordable, citing high monthly rents as well as often unobtainable deposit requirements. Issues were highlighted around a lack of HMO accommodation as well as difficulties sourcing short-term accommodation which was required due to the unavailability of some PBSA over the summer period. Attention was also drawn to students with a disability and/ or particular access requirements. Concerns were raised around PBSA rent levels and the pricing differential between university owned and privately owned PBSA.

Edinburgh Local Development Plan

The adopted City Plan 2030 Policy Hou 5 Student Accommodation sets the requirements for student accommodation:

- good access by public transport and active travel routes to further and higher education institutions
- provision of suitable amenity to students, including open space
- no more than 10% studio flats provided; and
- no adverse impact on the established character of the area.

Policy Econ 2 requires that proposals for commercial uses, including PBSA, within the urban area on sites 0.25ha or larger, should where compatible and appropriate within the site context, provide at least 50% of the site for housing.

City Plan 2030 does not allocate land specifically for student accommodation.

There is currently no planning restriction on numbers of Houses in Multiple Occupation (HMO) in Edinburgh. HMOs are assessed against LDP Policy Hou 6 Inappropriate Uses in Residential Areas which does not permit developments, including change of use, which would have a materially detrimental effect on the living conditions of nearby residents.

Non-statutory guidance on student accommodation was approved by the Council's Planning Committee on 10 September 2025. The guidance seeks to ensure the

provision of good quality PBSA in appropriate locations whilst protecting the character of existing areas.

Edinburgh Student Living Survey, 2025

The City of Edinburgh Council carried out an online consultation to seek the views of students on their experience of accommodation and living in Edinburgh. A total of 222 student responses were received. Key findings were:

- difficulty of finding accommodation due to competition for properties and lack of suitable accommodation
- challenges for international students due to guarantor requirements
- challenge of affordability with students describing rents across PBSA and rented sector as unaffordable
- poor quality accommodation is not reflected in rent levels
- more affordable accommodation is often located far from campus
- wide ranging accommodation costs per month range from less than £200 to over £1,000
- lack of disabled-friendly accommodation and limited housing options suitable for postgraduates, families or mature students.
- preference for private rented accommodation with reasons including the ability to choose who to live with, independence, freedom from hall restrictions, better value and ability to remain over summer
- locational preference for accommodation close to place of study with good transport links, access to shops and services, safe neighbourhood and access to greenspaces
- preference for a room in a shared flat, considered by some to be the most affordable option
- studio accommodation can be valued for personal space and reduced conflict with flatmates
- support for mixed housing and reducing segregation which can be caused by student-only accommodation and having shared space to enable natural interaction between students and the wider community.

Edinburgh's Higher and Further Education Institutions

Edinburgh's universities and colleges provide a substantial cluster of higher and further education establishments.

- Edinburgh Napier University
    - three main Edinburgh campuses at Merchiston, Craiglockhart, and Sighthill
- The University of Edinburgh

    - five main campuses located in central Edinburgh, Holyrood, Western General Hospital and to the south of the city at King's Buildings and at the Edinburgh BioQuarter
- Heriot-Watt University
    - single campus situated in the south-west of the city
- Queen Margaret University (QMU)
    - single campus university located in East Lothian, just outside the Edinburgh Council boundary included within the consideration of accommodation provision due to its proximity to Edinburgh and implications for accommodation.
- Edinburgh College
    - three campuses in Edinburgh located at Milton Road, Sighthill and Granton with a fourth campus in Midlothian
- Scotland's Rural College (SRUC)
    - campus locations across Scotland with Edinburgh campus at the University of Edinburgh's King's Buildings Campus and within the Bush Estate in Midlothian

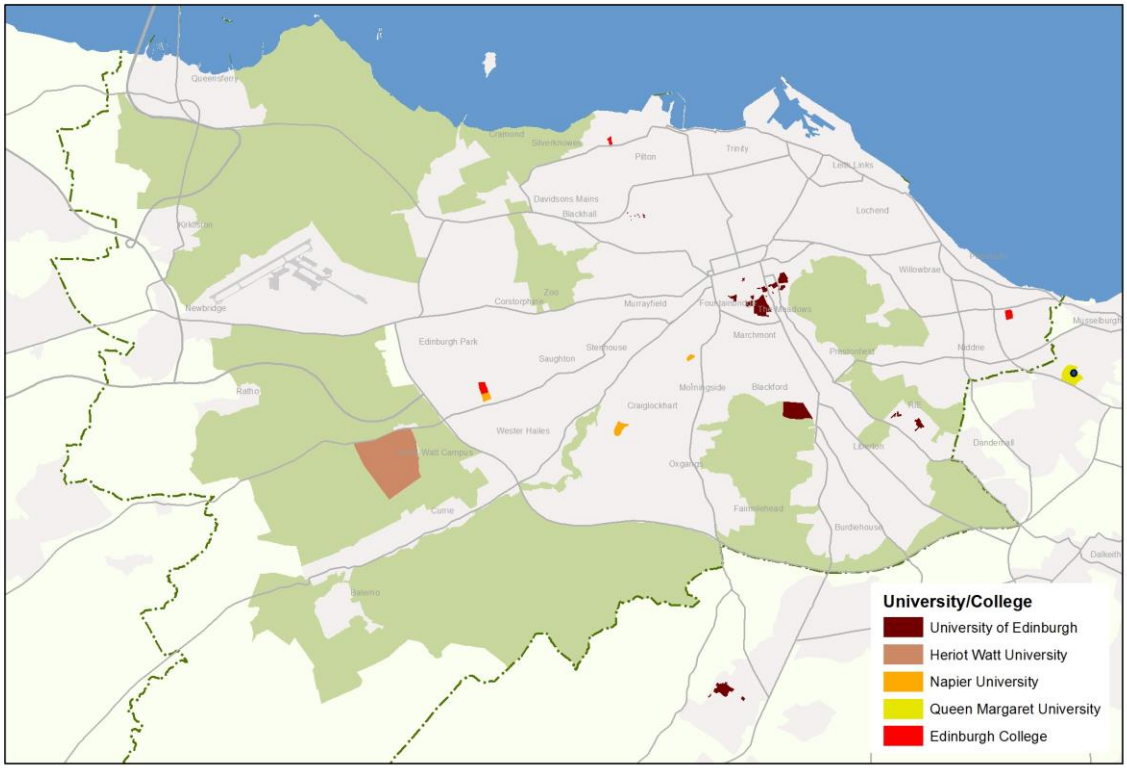


Figure 14.1: Location of further and higher education institutions

Students

Current Numbers

Students are a key part of the city and contribute to the local economy, supporting services and transport and providing diversity. They are resident in the city while

studying and many remain post studies. Edinburgh has the 7th largest full-time student population in the UK.

While the Census is the most wide-ranging survey of its nature, it has limitations for the purpose of identifying higher/further education institutions.

Firstly, in capturing data on full-time students, the Census does not distinguish between individuals attending school and individuals attending college or university.

Secondly, the Census is a snapshot of a single day, which is not ideal for sampling the student population of Edinburgh which fluctuates throughout the year.

Notwithstanding these limitations, the Census does provide a useful indicator of the number of potential students living in Edinburgh regardless of whether they attend an institution within the Edinburgh boundary. The Census identifies 66,204 full-time students aged 16 +. The map below shows where higher concentrations of students are living within Edinburgh which generally correlate with the location of campuses.

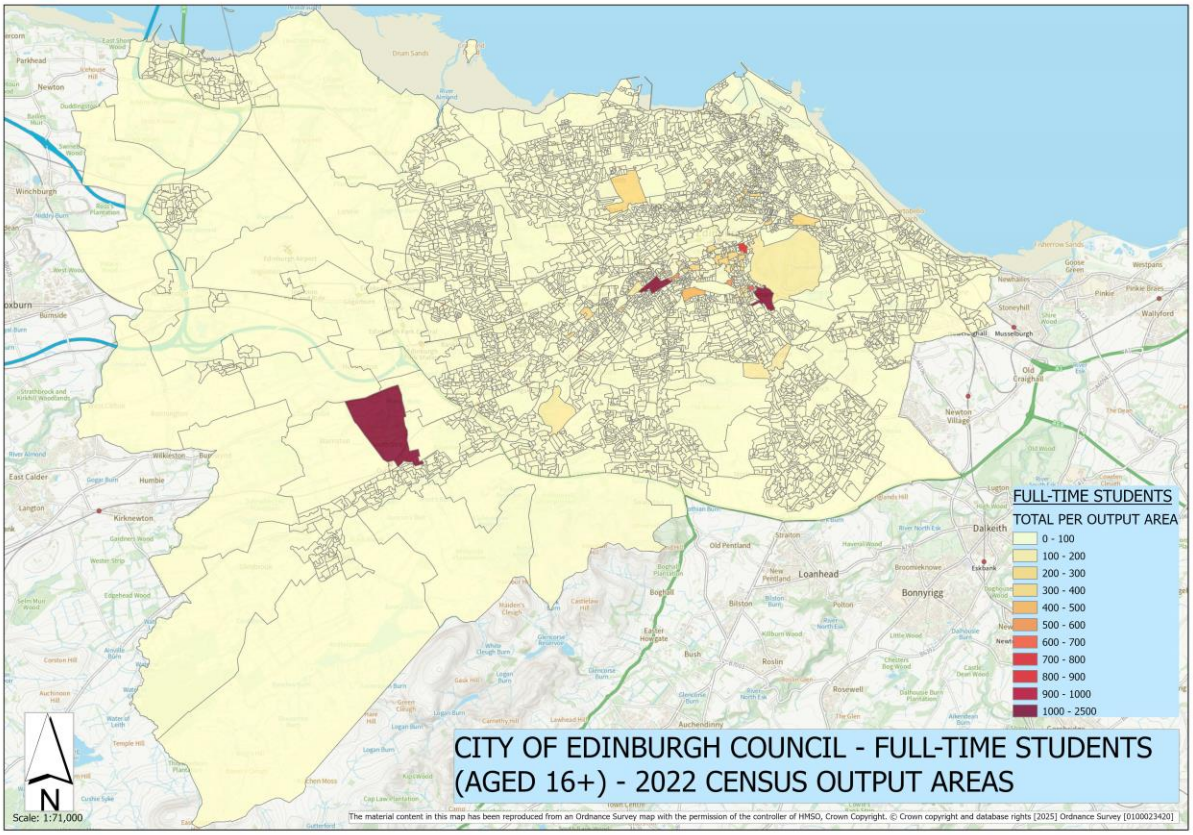


Figure 14.2: Location of full-time students aged 16+ by Census output areas

The Higher Education Statistics Agency (HESA) provides an official source of data on higher education in Scotland broken down by the institution attended. The latest information available is for the academic year 2024/25. There were 69,255 students (including both undergraduates and postgraduates) across the four universities (The

University of Edinburgh, Edinburgh Napier University, Heriot-Watt and QMU). 60,985 were full-time and the majority of students (67%) were undergraduates.

There were 27,000 students attending Edinburgh College (Edinburgh by Numbers 2024, CEC). This represents all enrolled students which includes full-time, part-time and evening enrolments. No breakdown is available of the attendance at the SRUC Edinburgh Campus. There were 1,260 students in attendance at their campuses spread across Scotland.

Edinburgh College data (Our Capital, Our College, 2024) shows that the majority of their students study part-time (56%) whilst 78% of students are in further education. As a result it is likely that the majority of students attending Edinburgh College will choose to stay at home and travel to college instead of requiring student accommodation.

Colleges are generally excluded from HESA data. As a result, students attending both Edinburgh College and SRUC are not included in the HESA statistics.

Reflecting this, the student numbers for Edinburgh College and SRUC have not been considered further in relation to the requirements for student accommodation. The Council will continue to work with and liaise with Edinburgh College and other providers with regards to identifying any accommodation needs for its students.

The information set out in the table below, based on HESA data, show that in 2024/25, a total of 69,255, students attended the 4 major higher education providers in Edinburgh. This number includes all full time, part time, undergraduate and postgraduate students.

	2024/25		
Higher education provider	**Part-time**	**Full-time**	**Total**
Edinburgh Napier University*	1,235	12,570	13,805
The University of Edinburgh*	3,590	35,425	39,015
Heriot-Watt University*	995	8,850	9,845
Queen Margaret University, Edinburgh*	2,450	4,140	6,590
Total	**8,270**	**60,985**	**69,255**

Figure 14.3: Enrolled students by mode of study 2024/25 (source: Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)

Higher education provider	All Undergraduate	All Postgraduate	Total
Edinburgh Napier University	10,255	3,550	13,805
The University of Edinburgh	25,790	13,225	39,015
Heriot-Watt University	6,890	2,955	9,845
Queen Margaret University	3,830	2,760	6,590
Total	**46,765**	**22,490**	**69,255**

Figure 14.4: Enrolled students by level of study 2024/25 (source: Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)

HESA is the official agency for the collection, analysis and dissemination of quantitative information about higher education in the United Kingdom, therefore, their data is a main basis for this topic paper. It should be noted that HESA data on student numbers for 2025/26 is not yet available, however, any implications from it will be considered in the Proposed Plan process when available.

Student numbers for 2024/25 as well as more up-to-date numbers for the current academic year 2025/26 have been provided directly by the universities, however, the figures provided by the universities for 2024/25 do not reconcile exactly with HESA data due to reporting methods.

A comparison of figures provided by the universities indicate that there has been a combined slight increase in the number of full-time students overall between 2024/25 and 2025/26, although numbers have fallen at the University of Edinburgh. The figures provided by the universities for 2025/26 are, however, still below the 2024/25 HESA numbers. These comparative figures are set out in the table below.

	HESA 24/25	University 2024/25	University 2025/26
Edinburgh Napier University	12,570	12,422	12,737
The University of Edinburgh	35,425	35,219	35,105
Heriot-Watt University	8,850	8,480	8,595
Queen Margaret University	4,140	3,525	3,573
Total	**60,985**	**59,646**	**60,010**

Figure 14.5: Full-time students 2024/25- 2025/26 (source Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)

The university provided figures also show has been an overall increase in the number of full-time first year undergraduates although numbers have fallen at Heriot-Watt University and QMU as set out in the table below.

	HESA 24/25	University 2024/25	University 2025/26
Edinburgh Napier University	3,435	2,944	3,397
The University of Edinburgh	6,410	6,740	7,109
Heriot-Watt University	1,925	1,780	1,700
Queen Margaret University	1,040	781	703
Total	**12,810**	**12,245**	**12,909**

Figure 14.6: First-year full-time undergraduates 2024/25-2025/26 (source: Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)

Longer-term trends

Numbers of Full-Time Students

While there has been a 25% overall rise in full-time students over the last 10 years, from 48,655 students in 14/15 to 60,985 in 24/25, the number of full-time students has fallen by 5% in the last 3 years, from according to HESA data. The number of full-time students at all institutions in Edinburgh also dropped by 1,550 between 2023/24 and 2024/25.

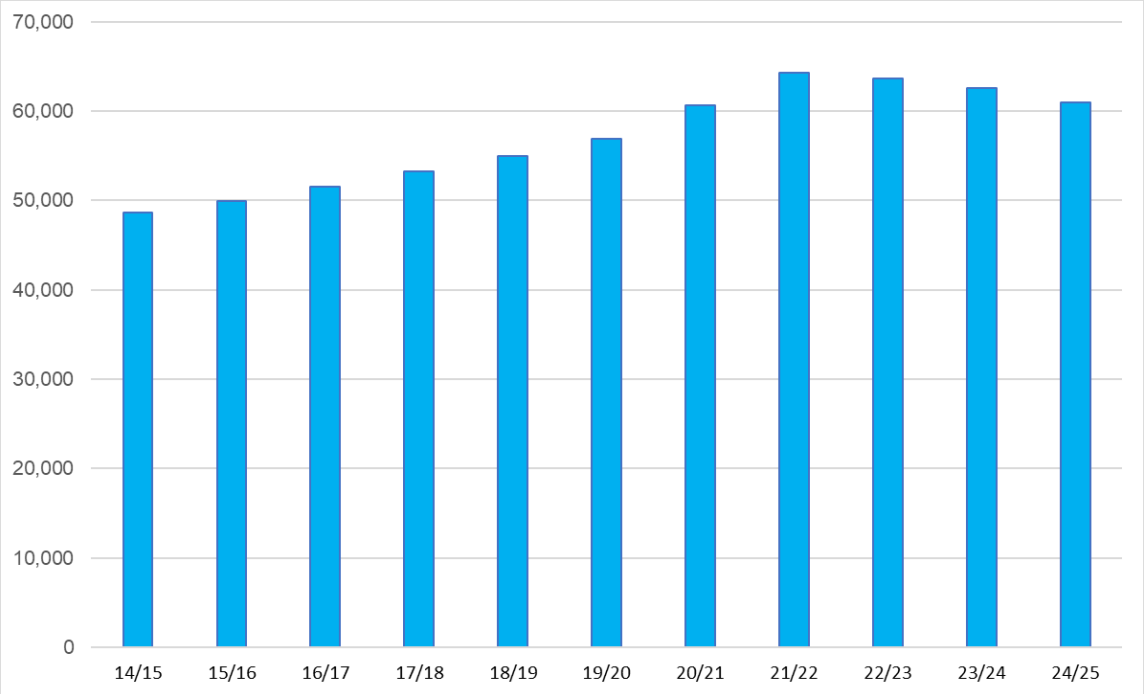


Figure 14.7: Trend in full-time students enrolled at Edinburgh's four universities (source: *Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)*

	2020/21	2021/22	2022/23	2023/24	2024/25
Edinburgh Napier University	12,840	13,575	14,100	12,970	12,570

The University of Edinburgh	33,940	36,210	34,920	35,785	35,425
Heriot-Watt University	9,645	10,220	10,085	9,430	8,850
Queen Margaret University, Edinburgh	4,195	4,250	4,535	4,350	4,140
Total	**60,620**	**64,255**	**63,640**	**62,535**	**60,985**

Figure 14.8: All full-time students by institution 2020/21-2024/25 (source: Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)

Numbers of first year full-time undergraduates

The number of first year full-time undergraduates increased in all institutions between 2023/24 and 2024/25, with the exception of Heriot-Watt, according to the HESA data. Despite an overall rise in the number of first year full-time undergraduates between 2022/23 and 2024/25, the total number in 2024/25 (12,810) is still below the numbers of the preceding years 2020/21 (13,390) and 2021/22 (13,895).

	2019/20	**2020/21**	**2021/22**	**2022/23**	**2023/24**	**2024/25**
Edinburgh Napier University	3,340	3,615	3,535	3,335	3,170	3,435
The University of Edinburgh	6,020	6,780	7,350	6,045	6,015	6,410
Heriot-Watt University	2,085	1,785	2,000	1,770	1,945	1,925
Queen Margaret University	1,015	1,210	1,010	960	960	1,040
Total	**12,460**	**13,390**	**13,895**	**12,110**	**12,090**	**12,810**

Figure 14.9: 1st year full-time undergraduates by institution (source: Higher Education Statistics Agency (HESA). Tabl1 1- HE Student enrolments by HE provider 2014/15 to 2024/25)

Numbers of EU and Non-EU Students

Since 2020/21 there has been a fall in the number of full time and part time EU students attending Edinburgh based universities, according to HESA data. In 2020/21 there were 6,755 EU students, whilst in 2024/25, there were only 3,625 (6% of the total student population).

The number of non-EU part time and full-time students continued to rise peaking at 21,995 at 2023/24 before dipping in 2024/25 to 20,720. Non-EU students made up 30% of the student population attending Edinburgh based universities in 2024/25.

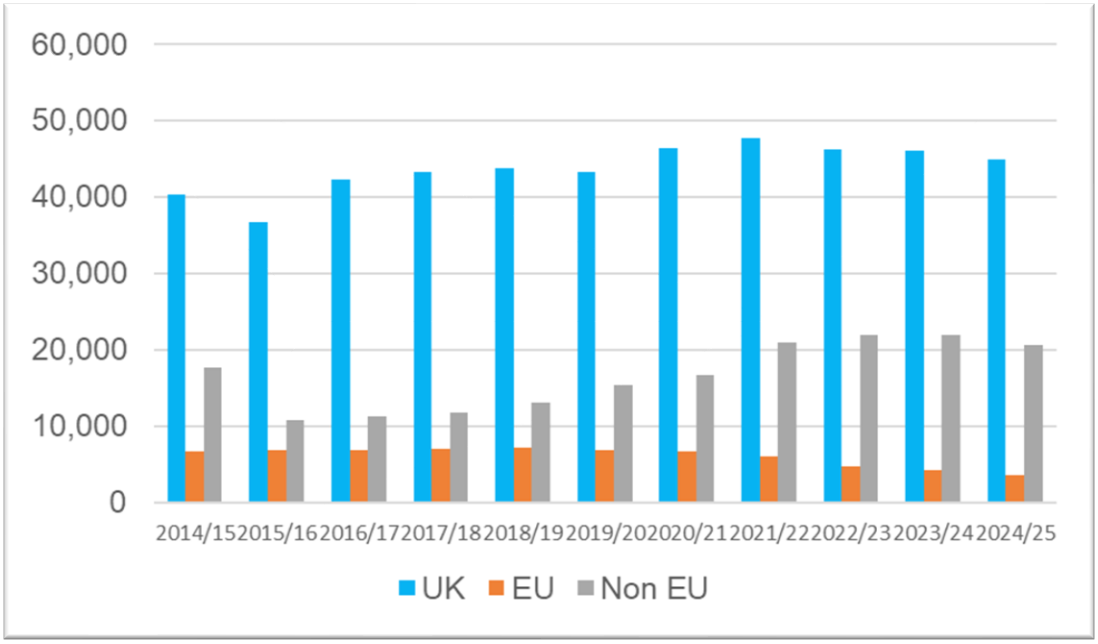


Figure 14.10: Domicile of all enrolled students 2014/15-2024/25 (source: Higher Education Statistics Agency (HESA), Higher Education Statistics)

Disability

20% of full-time students attending Scottish universities self-assessed as having a disability in 2024/25, this has increased from 14% in 2019/20. The number is not reported by HESA for individual institutions or by type of disability. Not all those declaring a disability will have a physical disability. Applying the 20% to the current enrolments at Edinburgh's universities suggests around 12,197 full time students may have a disability.

Disability status	**19/20**	**20/21**	**21/22**	**22/23**	**23/24**	**24/25**
Known disability	14%	15%	15%	17%	19%	20%

Figure 14.11: Disability status Scotland (source: Higher Education Statistics Agency (HESA) Figure 5- HE student enrolments by personal characteristics 2020/21 to 2024/25)

Accessible bedrooms for wheelchair users are required within PBSA developments at a rate of one wheelchair accessible bedroom for every 20 bedrooms, or part thereof, in accordance with Scottish Building Standards. Recent applications indicate a range in provision of between 4% and 9% with the most common provision being 5%.

A small number of respondents to the Student Accommodation Survey carried out by the Council noted a disability or access need. Responses highlighted issues

including lift and building access problems, reliance on well-maintained facilities, sensory overwhelm in shared flats and lack of adaptable space and personal control.

Overview

The information collected above shows that in 2024/25 there were 69,255 students attending the four major higher education providers in Edinburgh. Of those 60,985 were full time students according to HESA data. The HESA data also shows that whilst the numbers of full-time students in the city has increased by 25% over the last ten years (2014/15-2024/25) the numbers of full time students have actually fallen by 5% over the last 3 years from a peak of 64,255 full time students in 2021/22.

The numbers of 1st year full time undergraduates has increased between 2023/24 and 2024/25, however the numbers are still below those of 2020/21 and 2021/22. Since 2020/21 there has also been a quite dramatic reduction in the number of students attending Edinburgh based universities from EU countries, whilst even the numbers of students from non EU countries has dipped between 2023/24 and 2024/25.

Overall, the HESA data shows that after a period of relatively steady growth in full-time students numbers between 2014/15 and 2021/22, there has been a sustained gradual reduction in the number of full-time students attending the four major higher education providers in Edinburgh since 2021/22.

Whilst the most up-to-date data obtained from the Universities suggests that there has been an increase in student numbers between 2024/25 and 2025/26, this increase is only 0.6% and their-full time student numbers for 2025/26 are still below those provided by HESA for previous years. The data does not suggest a return to the growth in numbers seen between 2014/15 and 2021/22.

The percentage of full-time students attending Scottish universities self-assessed as having a disability has increased from 14% in 2019/20 to 20% in 2024/25. Therefore around 12,197 full time students attending the four major higher education providers in Edinburgh may have a disability.

Student Accommodation

There are four broad types of accommodation used by students in Edinburgh:

- Purpose-built student accommodation (PBSA) owned (or leased) by the university or college (also known as halls of residence). These properties are exclusively rented out to students attending the university or college in question. Many universities guarantee accommodation for first year students.

- Purpose-built student accommodation (PBSA) owned and operated primarily by the private but also the third sector, such as a co-op. These properties are generally available to rent by students irrespective of what university or college

they are attending. However, in some cases the owner of the property will enter into a 'nomination agreement' with a university or college, giving them first right of refusal over a specified number of bedrooms.

- Private homes rented by students (Private Rented Sector (PRS)), often in conjunction with several other students. These will frequently be house of multiple occupancy (HMO) properties. In theory, these properties are rented on the open market, although in practice the landlord may exclusively target student occupiers. Some students may live in mixed households rather than purely student households, for example students living with their parents or with their own family in rented accommodation.

- Private homes owned either by students or by their family. This accommodation type is most likely to be used by college students, who are more likely to live locally, and by postgraduate students, who are more likely to own their own home.

Purpose Built Student Accommodation (PBSA)

Summary of PBSA provision

Figure 14.12 below shows that universities account for just over half of PBSA bedspaces in Edinburgh with private/third sector accounting for the remainder.

Provider	No of PBSA properties	No of studios in PBSA	No of cluster-bed spaces in PBSA	Total bedspaces
University owned/managed	60	529 (4%)	12,048 (96%)	12,577*
Private	60	3,881 (36%)	6,955 (64%)	10,836
Edinburgh Student Housing Co-op	1	0	106	106
Total	**121**	**4,410 (19%)**	**19,109 (81%)**	**23,519***

*Figure 14.12: Summary of PBSA provision December 2025 (*Includes 800 bedspaces at QMU outwith the Edinburgh boundary; source: PBSA Data, CEC, December 2025*

PBSA is provided as studio accommodation and cluster flats. 19% of all PBSA is provided in studio format. Figure 13 below shows there is a larger proportion of studio accommodation within the private sector (36%) than that provided by universities (4%). City Plan 2030 limits the provision of studios to 10% to support the wellbeing of students, as studio flats can lead to social isolation. In high concentration they do not foster healthy student communities while cluster flat

arrangements allow the opportunity for students to interact. Cluster flats are also likely to be lower cost than studio accommodation.

As noted above, the Student Accommodation Survey identified a preference of some students for studio accommodation which was valued for personal space and reduced conflict. Flexibility is required to respond to market need and the requirements of mature, international, or neurodivergent students who may prefer their private space.

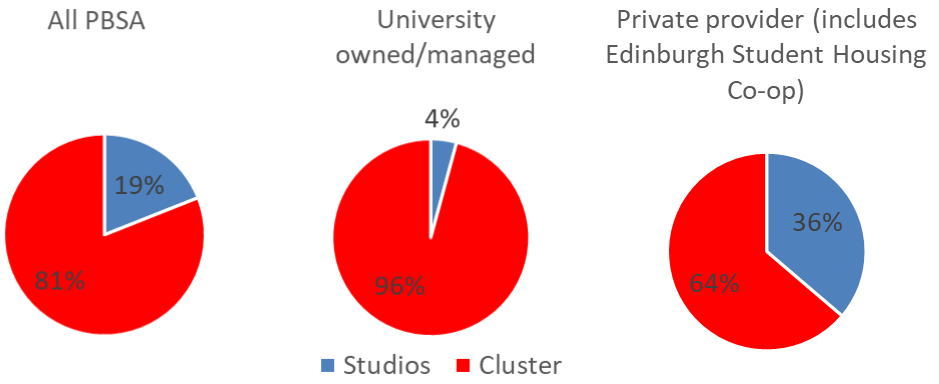


Figure 14.13: Proportion of accommodation by type December 2025 (source: PBSA Data, CEC, December 2025)

PBSA buildings in Edinburgh range in size from 11 bedspaces to 931 bedspaces. Most developments fall within the range of 50-250 beds. There are only four which are over 500 bedspaces. Most developments in the last five years have been in the range 50-250 beds.

No. of bedspaces	All PBSA	Private	University	Co-op
Less than 50	11	5	6	0
50-250	81	39	41	1
250-500	25	15	10	0
500+	4	1	3	0

Figure 14.14: All PBSA by size 2025 (source: PBSA Data, CEC, December 2025)

No. of bedspaces	All PBSA	Private	University
Less than 50	3	3	0
50-250	14	13	1
250-500	6	4	2
500+	0	0	0

Figure 14.15: Recently completed developments (2020-2025) (source: PBSA Data, CEC, December 2025)

Growth of PBSA

There has been a 41% increase in the number of all PBSA bedspaces in the last ten years (from 16,698 to 23,519). Growth has been driven by the private sector.

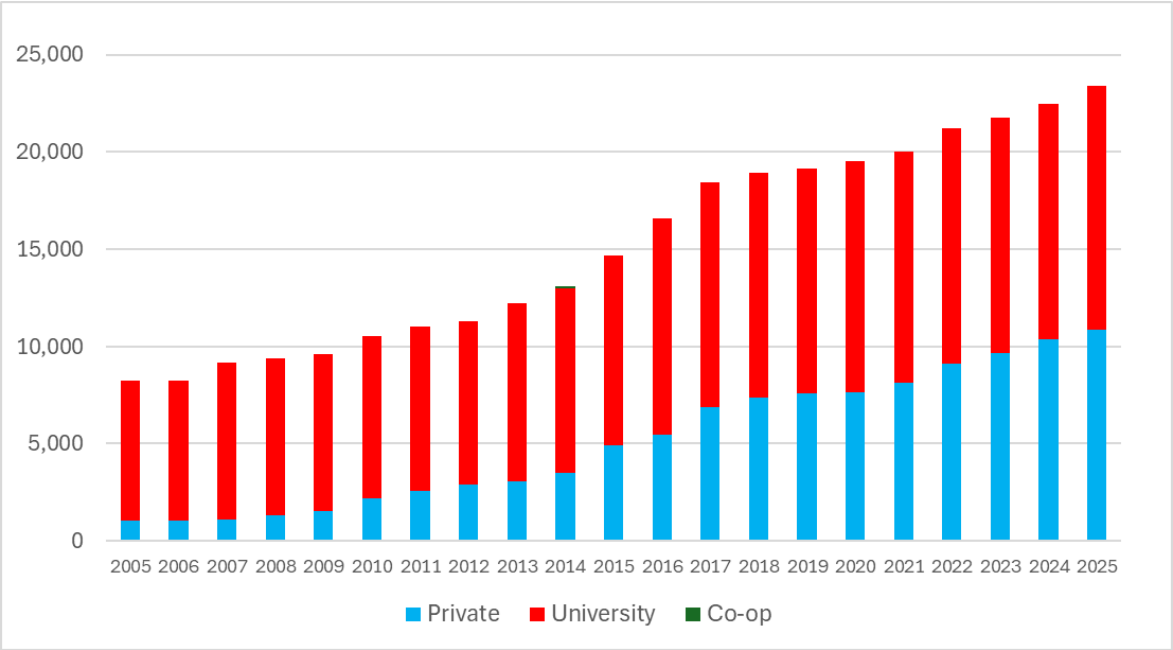


Figure 14.16: All PBSA bedspaces 2005-2025 (source: PBSA Data, CEC, December 2025 (includes 800 bedspaces at QMU completed in 2007))

The highest PBSA bedroom completion rates per annum in the period were experienced in 2015-2017 as indicated in the table below.

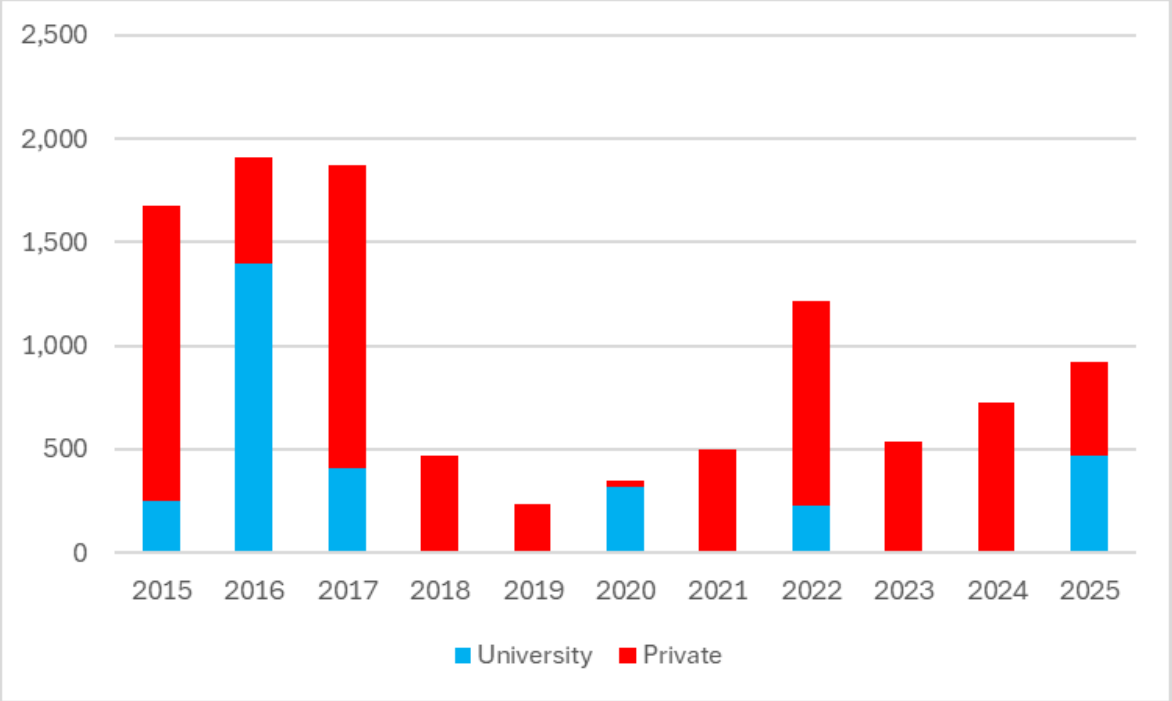


Figure 14.17: PBSA completions 2015-2025 by bedspaces (source: PBSA Data, CEC, December 2025)

There were 921 PBSA bedrooms completed in 2025, whilst this is an increase in the numbers from 2023 and 2024, it is a decline from 2022 and the period between 2015 and 2017.

Figure 14.18 shows that there have been 90 planning applications for PBSA (university owned/managed and private/third sector) since 2016. However, figure 16 also shows that in 2025, there was a fall in the number of applications for PBSA compared with 2024. While 2025 represented the lowest level of PBSA applications since 2021, it still represents applications for 1,586 PBSA bedspaces.

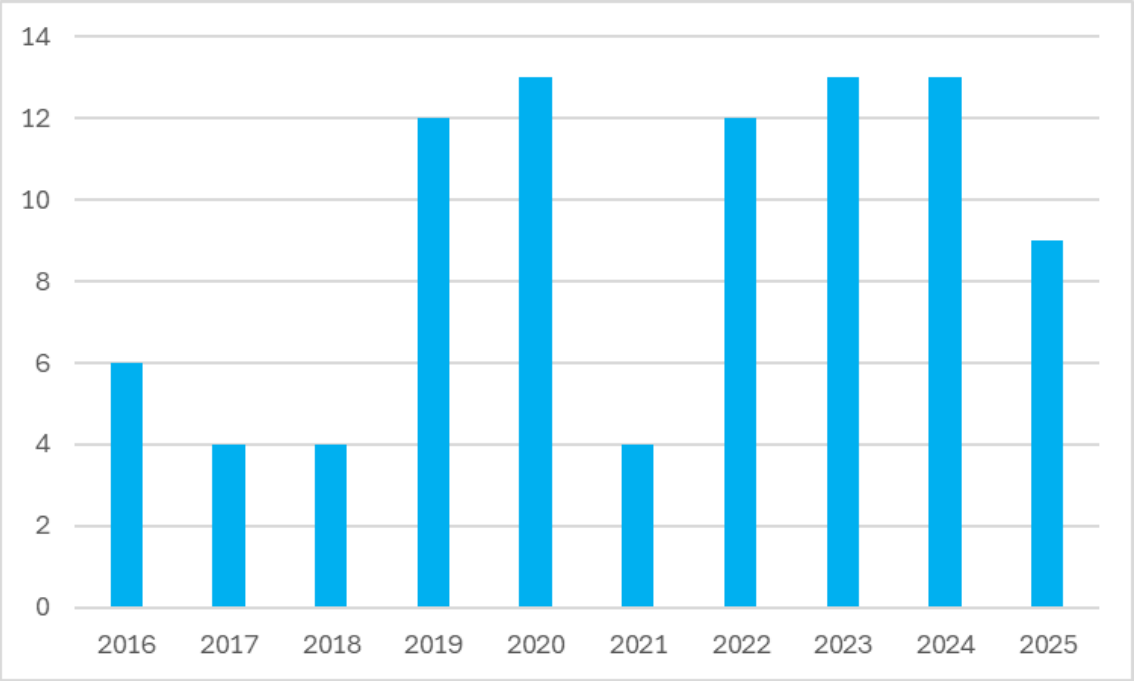


Figure 14.18: Number of planning applications received for PBSA development 2016-25 (source: Applications and decisions CEC Planning)

	Total applications received	Consents issued each year *	Appeals allowed each year	Refused each year	Appeals Dismissed each year	Withdrawn each year	Pending
2016	6	7	0	0	0	0	0
2017	4	3	0	1	0	0	0
2018	4	3	0	0	0	0	0
2019	12	3	0	0	0	0	0
2020	13	12	1	0	0	2	0
2021	4	3	1	0	0	0	0
2022	12	2	4	0	0	0	0
2023	13	4	3	2	1	1	0
2024	13	6	3	1	7	1	0
2025	9	7	3	6	1	0	5

Total	**90**	**50**	**15**	**10**	**9**	**4**	**5**

*Figure 14.19: Applications by year and decisions 2016-2025 *Includes Minded to Grant and Notice of Intention (source: applications and decisions CEC Planning)*

In the last 10 years, 50 planning consents were granted/minded to grant for 8,145 PBSA bedspaces. 15 of these consents were granted after appeals were allowed.

	Total beds	**Studios**	**Cluster Beds**
Consent*	8,145	3,949	4,196
Refused	1,443	324	1,119
Dismissed at appeal	1,019	879	140
Allowed at appeal	2,624	1,059	1,565
Withdrawn	342	68	274
Pending	525	48	477

*Figure 14.20: Applications and decisions by type and bedspace 2016-2025 *Includes Minded to Grant and Notice of Intention (source: Applications and decisions CEC Planning, December 2025)*

PBSA on sites allocated for housing in City Plan 2030

City Plan 2030 Policy Hou 1 supports housing on allocated sites to meet the housing land requirement. Land for PBSA is not included in this calculation as the housing land requirement is based on the formation of households and therefore excludes those people living in communal establishments such as PBSA. PBSA on allocated housing sites does not accord with Hou 1. Seven applications have come forward on sites allocated in the LDP for general housing, six of which have been resisted by the Council.

Planning application reference	**Address**	**LDP housing proposal reference**	**LDP housing units**	**Application housing units**	**Application total student beds**	**Decision**	**Decision Date**
24/01574/FUL	10 Orchard Brae	H34	124	65	301	Refused	19/12/2024
25/01899/FUL	Land 60m north of 1 Fettes Row	H16	349	315	593	Refused. Appeal to DPEA ongoing	17/12/2025

23/06745/FUL	52-66 Salamander Street	H35	113	46	230	Refused. Appeal dismissed by DPEA	16/06/2025 (DPEA decision)
24/03101/FUL	117-129 Pitt Street	H39 (part of)	103	0	80	Refused. Appeal allowed by DPEA	02/02/26 (DPEA decision)
24/03103/FUL	137-145 Pitt Street	H39 (part of)	103	0	140	Refused. Appeal allowed by DPEA	02/02/26 (DPEA decision)
22/06251/FUL	14 Ashley Place	H45 (part of)		0	229	Refused. Appeal allowed by DPEA	07/07/25 (DPEA decision)
24/01162/FUL	Manderston Street	H42 (part of)	235	0	201	Granted	02/04/2026

Figure 14.21: Applications on allocated housing sites (source: CEC Planning)

Homes for Scotland considers that there is competition for sites for a range of uses and considers that the Council should allocate sites for PBSA to prevent an erosion of the Local Housing Land Requirement for housing. Homes for Scotland also requests that the Council identify how many opportunities for residential development have been lost to PBSA development. The above table identifies those allocated housing sites where there has been a permission for PBSA since City Plan 2030 was adopted, however, it should be noted that those decisions were made on the basis that the sites would have sufficient remaining land to largely deliver the allocated housing numbers applied to them.

Since the adoption of City Plan 2030 in November 2024, there has been a policy requirement for the provision of housing on non-allocated sites alongside PBSA where the site is 0.25 ha or more. Provision should be 50% of the site. No applications have come forward since the adoption of City Plan 2030 on sites of 0.25 ha or larger. Prior to the adoption of City Plan 2030, the requirement was contained within the now superseded Student Accommodation Non-Statutory Guidance February 2016. Since that time, there have been 25 applications for the development of PBSA on non-allocated sites 0.25 ha or larger. Nine of these applications included housing ranging from 43% to 70% of gross floorspace.

Application Reference	Address	% of floorspace housing	Housing units	Student beds	Status
18/02719/FUL	9 Sciennes Road	63%	31	323	Operational
19/04557/VARY	151 London Road	50%	107	377	Consent
20/00465/FUL	Baltic Street	57% over wider site	14	604	Under construction
20/00972/FUL	48-50 Iona Street,	50%	80	250	Operational
20/02827/FUL	2 Abbey Lane	45%	68	298	Operational
22/00670/FUL	6 New Market Road	50%	393	406	Notice of Intention issued
22/01563/FUL	East of Leith Walk (Halmyre Street)	45%	54	230	Under construction
23/04069/FUL	94 Ocean Drive	43%	112	404	Consent

Figure 14.22: Sites above 0.25Ha providing housing (source: PBSA by site size CEC Planning)

There were 16 applications which did not include housing. Eight were granted consent, six were allowed at appeal. Unsuitability for housing, viability and developable area below the 0.25ha threshold were reasons provided as justification for lack of housing provision. Two applications were refused however failure to provide the required housing was not given as a reason for refusal.

In the last year, 2 planning consents were granted for a change of use from private PBSA to provide temporary accommodation. One application was for a temporary period of 10 years. If both were implemented this would be a loss of 163 studios.

Pipeline

The pipeline of PBSA development in December 2025 was 5,917 bedspaces. 42% of the pipeline is for studio accommodation.

Status	Total beds	Studios	Cluster beds
Consent	3,087	1,308	1,779
Minded to grant and notice of intention	960	145	815
Under construction	1,345	943	402
Pending	525	48	477
Total Pipeline	**5,917**	**2,444**	**3,473**

Figure 14.23: PBSA Development Pipeline in December 2025 (source: CEC, Pipeline Updated, December 2025)

Location of PBSA

University accommodation is provided within or close to universities. Private PBSA is more dispersed across Edinburgh. City Plan 2030 policy Hou 5a) supports PBSA where there is good access by public transport and active travel routes to further and higher education institutions. Increasingly more developments are located in the outer city.

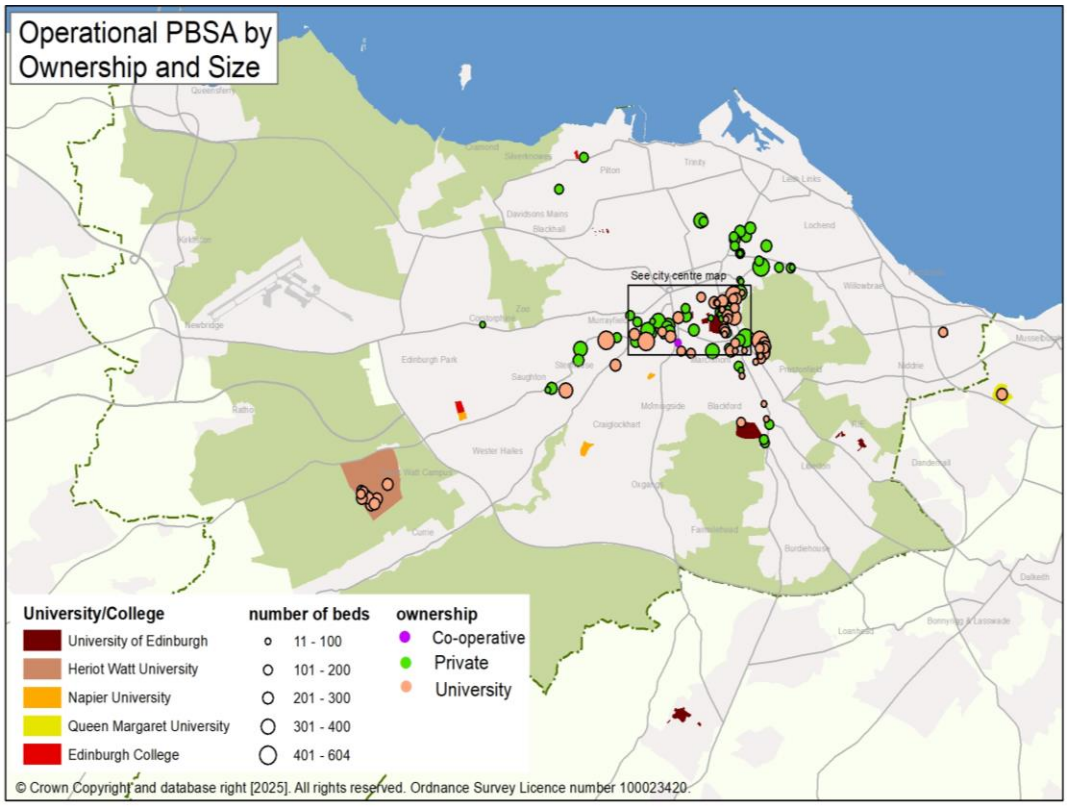


Figure 14.24: Operational PBSA in Edinburgh (source: CEC, December 2025)

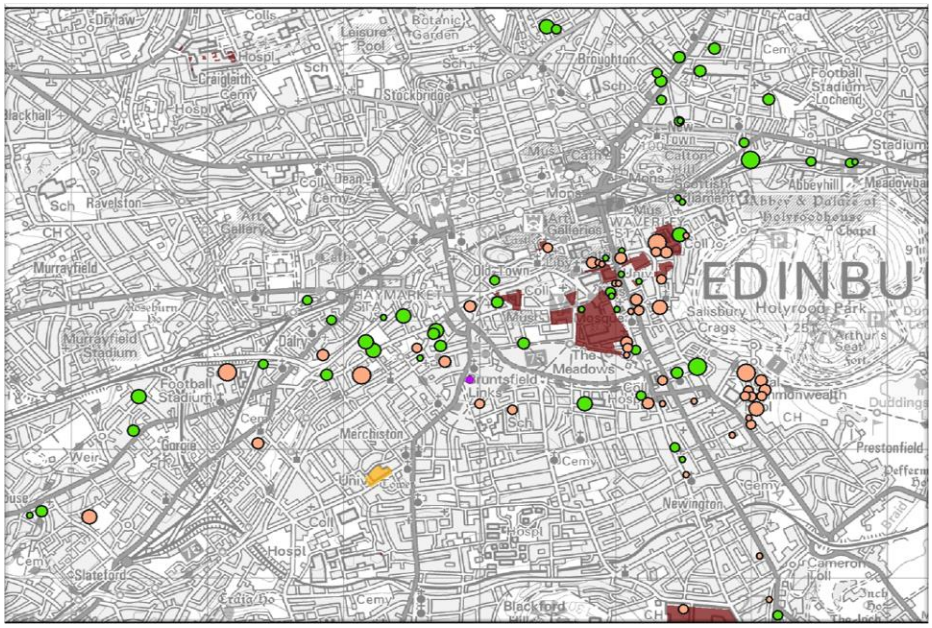


Figure 14.25: Operational PBSA City Centre Inset (source CEC, December 2025)

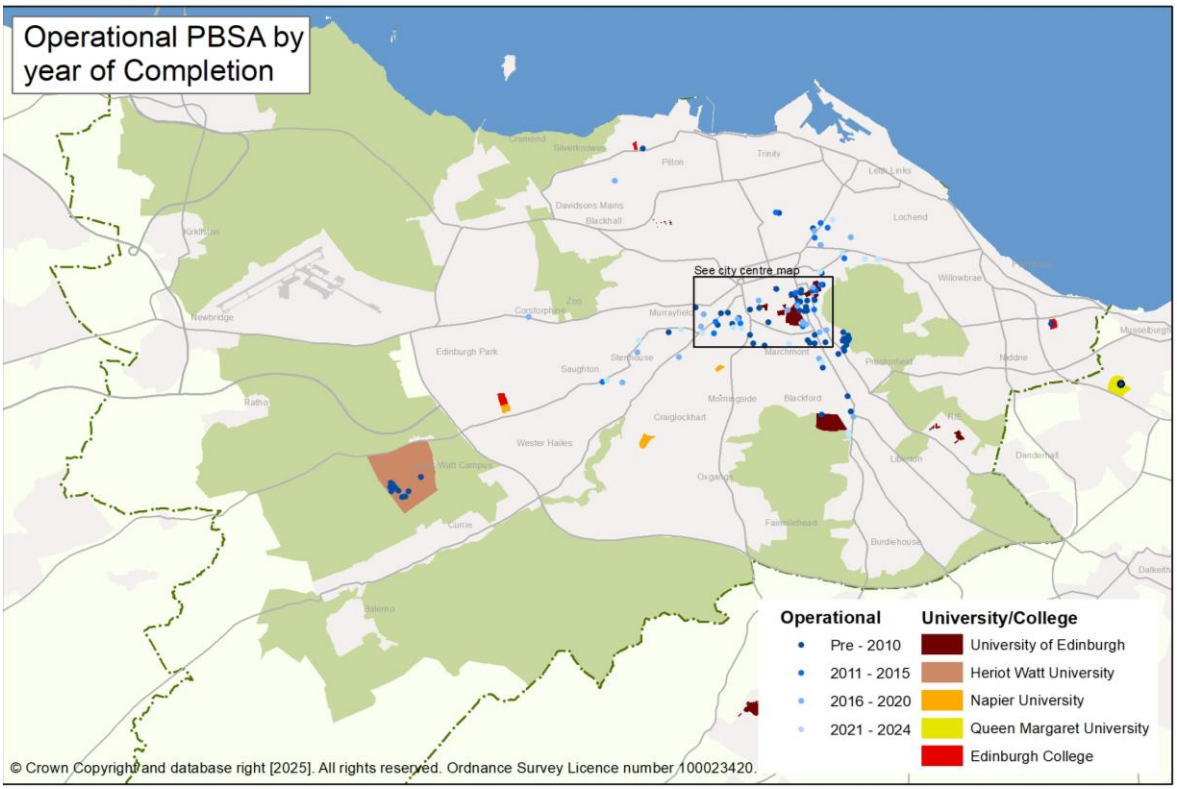


Figure 14.26: PBSA by year of completion: December 2025 (source: CEC, December 2025)

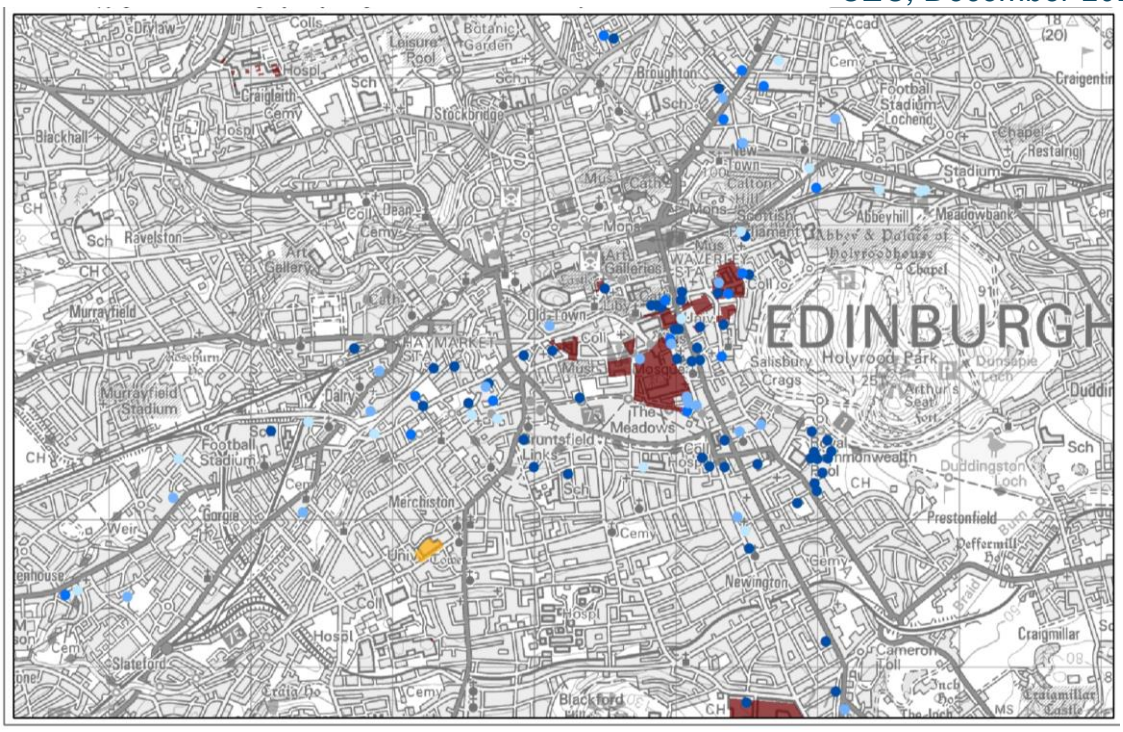


Figure 14.27 PBSA by year of completion (City Centre inset) (source CEC, December 2025)

PBSA is present in all wards in the city except for Colinton/Fairmilehead, Drum Brae/Gyle, Inverleith and Leith. The majority are located in the City Centre, Southside/Newington, Fountainbridge/Craiglockhart, Leith Walk and Pentland Hills. The wards with the largest number of bedspaces are those which contain universities.

Ward	Operational		
	No of PBSAs	**No of bedspaces**	**Overall % of bedspaces**
Almond	1	102	0
City Centre	27	5,266	23
Colinton / Fairmilehead	0	0	0
Corstorphine / Murrayfield	1	16	0
Craigentinny / Duddingston	6	1,257	6
Drum Brae / Gyle	0	0	0
Forth	1	110	0
Fountainbridge / Craiglockhart	9	2,857	13
Inverleith	0	0	0
Leith	0	0	0
Leith Walk	11	2,202	10
Liberton / Gilmerton	2	257	1
Morningside	2	281	1
Pentland Hills	10	2,042	9
Portobello / Craigmillar	1	122	9
Sighthill / Gorgie	7	1,721	0
Southside / Newington	43	6,486	28
Total	**121**	**22,719***	**100**

*Figure 14.28: PSBA by ward *Figure excludes the 800 bedspaces at QMU outwith CEC boundary (source: CEC, December 2025)*

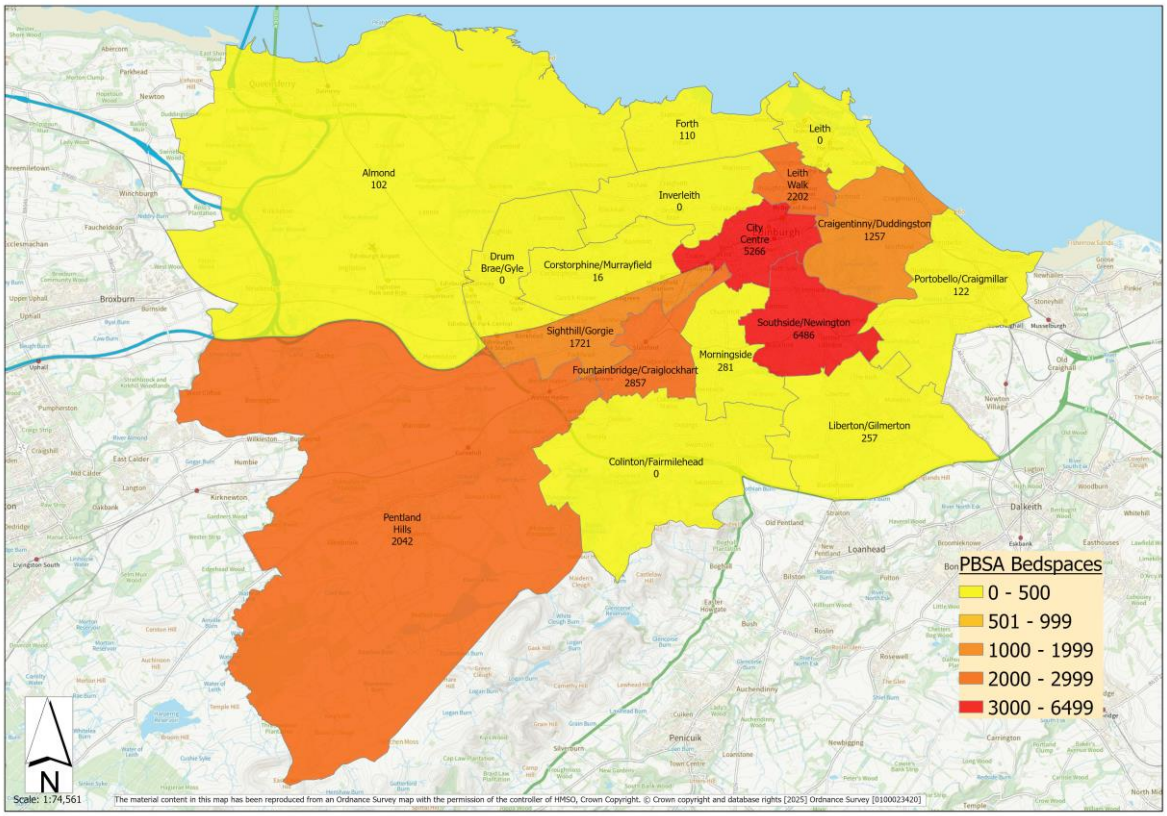


Figure 14.29: PSBA by ward (source: CEC, December 2025)

PBSA development in the pipeline is mostly located within Leith, Leith Walk and Sighthill/Gorgie wards as shown in Figure 15.30 below which shows the PBSA bedspaces pipeline location by ward (it excludes wards with no pipeline).

	Pipeline (No. of bedspaces)	**Operational plus pipeline (No. of bedspaces)**
Almond	0	102
City Centre	568	5,834
Corstorphine / Murrayfield	0	16
Craigentinny / Duddingston	719	1,976
Forth	0	110
Fountainbridge / Craiglockhart	760	3,617
Leith	1,008	1,008
Leith Walk	1,239	3,441
Liberton / Gilmerton	103	360
Morningside	0	281
Pentland Hills	382	2,424
Portobello / Craigmillar	0	122
Sighthill / Gorgie	901	2,622
Southside / Newington	237	6,723
Total	**5,917**	**28,636**

Figure 14.30 PBSA bedspaces pipeline by ward (source: CEC, December 2025)

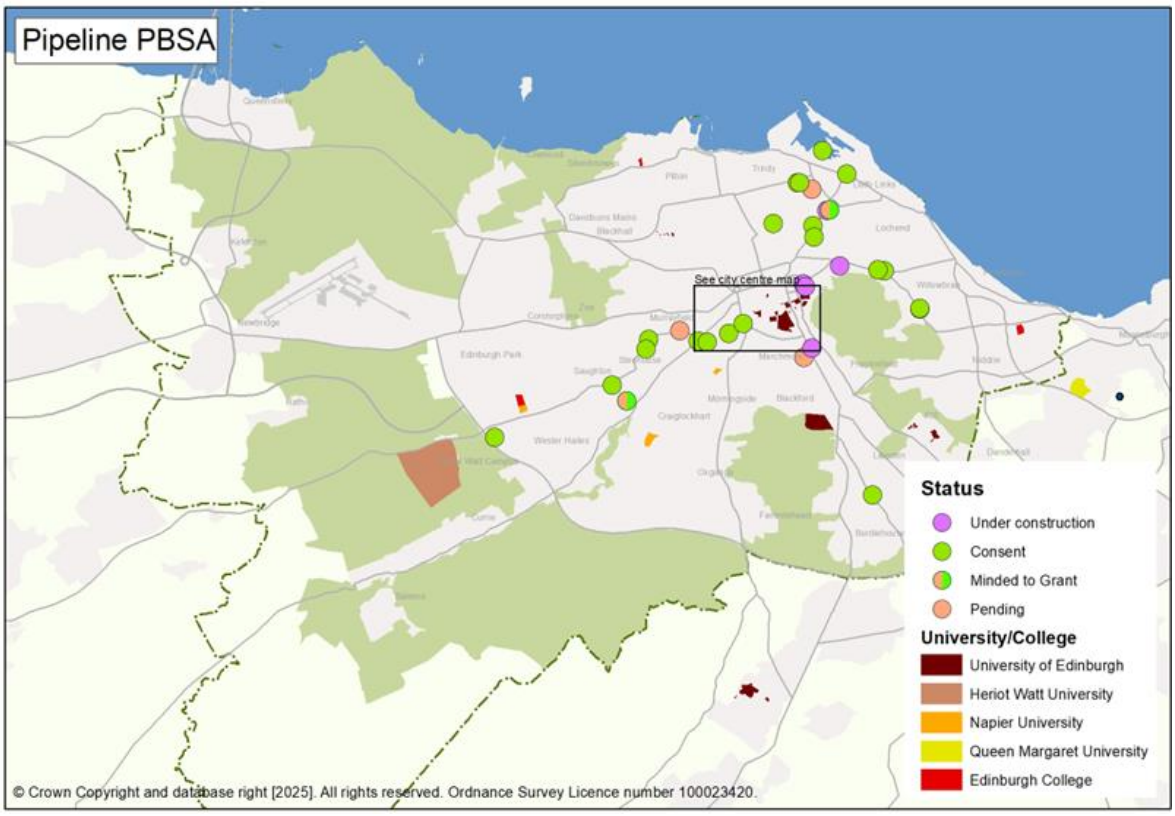


Figure 14.31: Location of pipeline PBSA (source: CEC, December 2025)

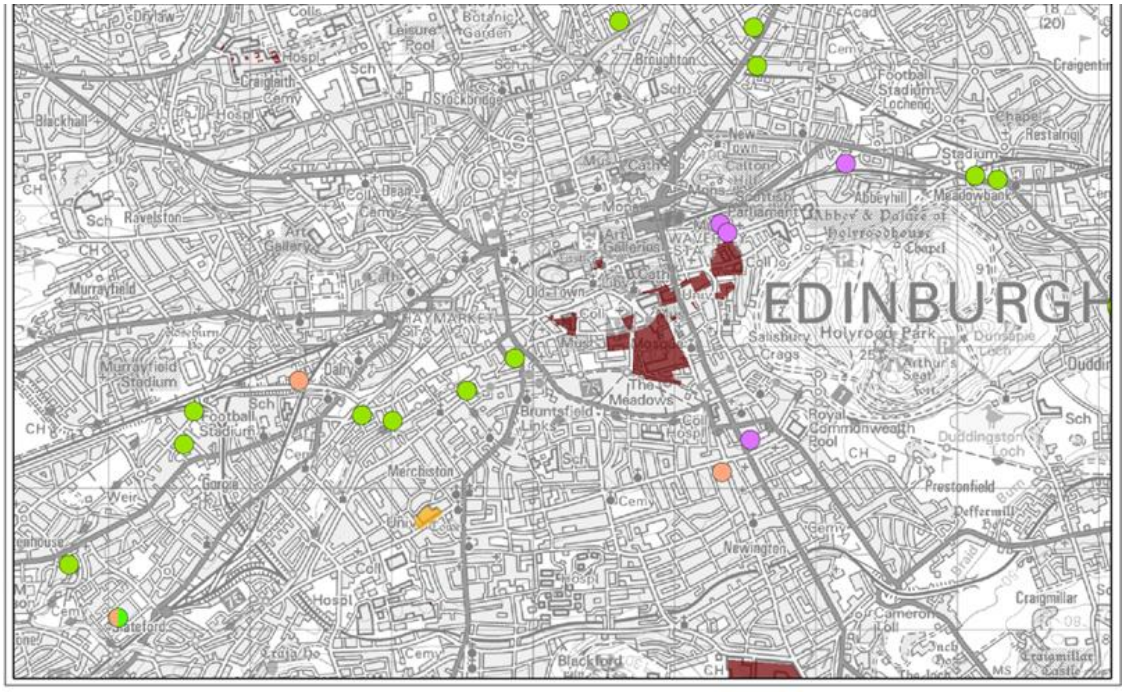


Figure 14.32: Location of pipeline PBSA City centre inset (source: CEC, December 2025)

Scottish Government research on PBSA and the Student Accommodation Survey indicate that location is an important consideration for students with preference for

accommodation close to place of study with good transport links, access to shops and services, safe neighbourhood and access to greenspaces.

Edinburgh Student Housing Co-operative (Third sector)

Edinburgh Student Housing Co-operative (ESHC), founded in 2014, is a fully mutual housing cooperative operating two buildings in central Edinburgh, originally managed by Edinburgh Napier University. These buildings comprise 24 cluster flats, totalling 106 bedrooms. Open to all full-time and part-time students in Edinburgh, membership requires purchasing a £1 share, which grants students tenancy and directorship until they cease being students or rescind their membership. Leasing its buildings from Places for People Scotland, ESHC handles all interior operations and maintenance.

The ESHC distinguishes itself from other forms of student housing through its non-profit member-focused model, which ensures affordable rents, determined democratically, based on operational budgets and lease costs. By avoiding staff employment and relying on residents' labour, overheads are significantly reduced. ESHC's community-first values integrate members into the local community. Replicating the student cooperative housing model elsewhere in Scotland, according to ESHC, will require significant policy changes to enhance funding, legitimacy and support for such projects. While there is some funding available to new housing co-operatives due to community fundraising efforts, it is difficult to compete with institutional investors on the open market.

PBSA providing accommodation in summer months

The Visitor Accommodation Study prepared for City of Edinburgh Council as part of the wider Economic Needs Study notes the role of PBSA in providing accommodation to visitors in the summer months. It notes that the exact quantum of supply available from June to August varies from year to year, but is broadly as set out in Figure 24 below:

CAMPUS	FLATS	ROOMS	TOTAL UNITS
Bainfield	117	778	2015
Orwell Terrace	35	245	2015
Pollock Estate	0	2,000	2016
Total	152	3,023	3,175

Figure 14.33: PBSA used as visitor accommodation (source: Edinburgh Economic Needs Study: Visitor Accommodation, May 2025)

In the last 5 years there have been 7 applications for a temporary change of use in the summer months from PBSA to short-term letting.

Strengths and Weaknesses of PBSA Provision

Student Housing Options and Experiences of Homelessness in Scotland, Cross-party Group on Housing, September 2024 identifies the strengths and weaknesses of

PBSA. It identifies that ‘university halls of residence offer significant advantages, particularly for first-year and international students. Their proximity to campus reduces commuting time and costs, while the structured environment, complete with support services, can help some students transition into university life. University halls also help to foster a sense of community, which can enhance the overall social experience for students. A further strength is that there is a degree of accountability and representation that is absent from private PBSA. Elected student representatives have formal routes to raise quality and affordability issues to the University leadership. However, the insecurity of the standard tenancy tied to the academic year may leave some students vulnerable to homelessness during summer breaks, as they might struggle during that time to find alternative accommodation. This is especially true for those students for whom returning home or living with a parent or guardian is simply not possible. Moreover, despite being provided by universities, student halls can still be an expensive option for students, particularly in high-demand areas.

Private PBSA is known for offering modern amenities and higher quality living standards, perhaps, than other student accommodation options, including halls. These private developments also are often accompanied by better security features compared to private rental options. Typically located in student-centric areas, private PBSA can be convenient for accessing campus and local services. However, these advantages come at a high cost. Private PBSA, especially newer luxury developments, are often more expensive than other housing options, making them inaccessible to many students, particularly those from lower-income backgrounds. This affordability gap can therefore create a division among students based on financial means, potentially leading to a segregated student community.’

Overview

In December 2025, there were a total of 23,519 PBSA bedspaces in Edinburgh. This number includes all university owned/managed sites as well as those run by the private sector and third sector. It also includes the 800 bedspaces at QMU which are outwith the Edinburgh boundary. The majority of PBSA buildings constructed are within the range of 50-250 beds and the accommodation provided is largely in the form of cluster flats

There has been a 41% increase in the number of all PBSA bedspaces in the last ten years (from 16,698 to 23,519). Growth has been driven by the private sector. The highest completion rates per annum were experienced in 2015-2017 while 2025 represented a fall in the numbers of applications for PBSA compared with 2024 and the lowest level of PBSA applications since 2021.

Whilst the data suggests a slowdown in developer appetite for PBSA, it must still be noted that the levels of applications are still higher than they were between 2016-2018 and that the applications granted in 2025 still represented 1,586 PBSA bedspaces.

The pipeline of PBSA development in December 2025 was 5,917 bedspaces. 42% of the pipeline is for studio accommodation. PBSA is present in all wards in the city except for Colinton/Fairmilehead, DrumBrae/Gyle, Inverleith and Leith.

The majority are located in the City Centre, Southside/Newington, Fountainbridge/ Craiglockhart, Leith Walk and Pentland Hills. The wards with the largest number of bedspaces are those which contain universities.

The noted strengths and weaknesses of PBSA development can differ depending on whether they are university owned/managed or are private. Strengths of university owned PBSA students are their proximity to campus, reducing commuting time and costs whilst university ran PBSA can have support services and foster a sense of community amongst students. Private PBSA is noted for offering modern amenities higher quality living standards but weaknesses for students is the high cost of PBSA, which is discussed in greater detail in the costs and affordability section below, and the insecurity of the standard tenancy tied to the academic year.

Private Rented Sector (PRS)

In 2024/25 HESA reported a total of 14,860 students (24%) residing in Edinburgh's private rented sector (PRS). PRS includes houses in multiple occupation (HMOs), build to rent accommodation or other rented accommodation. Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing note that a much larger proportion of the student population in Edinburgh is housed in the PRS compared to that in Aberdeen or Dundee.

PRS in Edinburgh and Scotland has gone through significant changes over the last 5-10 years, in terms of rent levels and the size of the PRS. The PRS now makes up 23% of homes in Edinburgh or 65,446 registered properties compared to 13% nationally (Scottish Household Survey 2023).

The LHS notes that there are 44,441 active registered landlords who are managing 65,446 registered rental properties. Landlord registration figures in Edinburgh show an increase over the last five years, with the number of active landlords increasing by 8%, and the number of registered properties increasing by 16.4%. These figures are significantly above the national trend, which shows a 6% drop in the number of active landlords and a 2.8% increase in the number of registered properties over the same period.

The LHS reports that in early 2024, Scotland's Housing Network (SHN) carried out a national survey of registered landlords to understand the issues facing landlords and to find out about their practice. Over 5,400 registered landlords in Edinburgh responded. When asked what their future plans were, over one third (39%) of landlords said they plan to keep their number of properties the same. A further third (32%) said they had not made plans and 25% planned to decrease their number of properties or sell all their properties and leave the business. Only 4% indicated they intended to increase their number of properties.

The Council's LHS reports that rents in the PRS have increased by 82% on average in Edinburgh over the last 10 years. In the last 18 months, Edinburgh has continued to experience the highest rental inflation of any UK major city.

Many students living within the private rented sector are within houses in multiple occupation (HMOs). Student Living Report, University of Edinburgh, Edinburgh Napier University, Heriot-Watt University, Queen Margaret University, August 2025 estimates 27,000 students are trying to secure housing in the Private Rented Tenancy sector.

As noted in Topic 13 Specialist housing and other accommodation, there has been a fall in the number of licensed HMOs in Edinburgh in the last year. In 2024 there were 6,325 licences in force, almost 10% of all registered private rented homes in Edinburgh.

Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing notes that PRS and HMOs provide students with more flexible tenancy arrangements and a wider range of location choices compared to PBSA and may allow for more affordable housing options further from campus. However, the quality of HMOs can vary widely with some properties being poorly maintained. Students in HMOs may also face challenges such as short tenancies, unresponsive landlords and potential exploitation, particularly for international students who may be less familiar with local tenancy laws and regulation. HMOs can also lead to tensions between students and long-term residents in the surrounding community which also applies to PBSA developments.

The loss of residential accommodation to short-term lets affects housing supply. In September 2022, the entire Council area was designated a short-term let control area and Topic 12 Housing land notes that in October 2025, the Council's register showed 2,953 licences had been issued for entire properties.

Location of students in the PRS

Council Tax records identify student only households and households with all but one student. Students are those that are full-time or meet other qualifying criteria. In April 2025 records indicate there were 9,962 properties occupied by student only households and a further 3,752 occupied by all but one student.

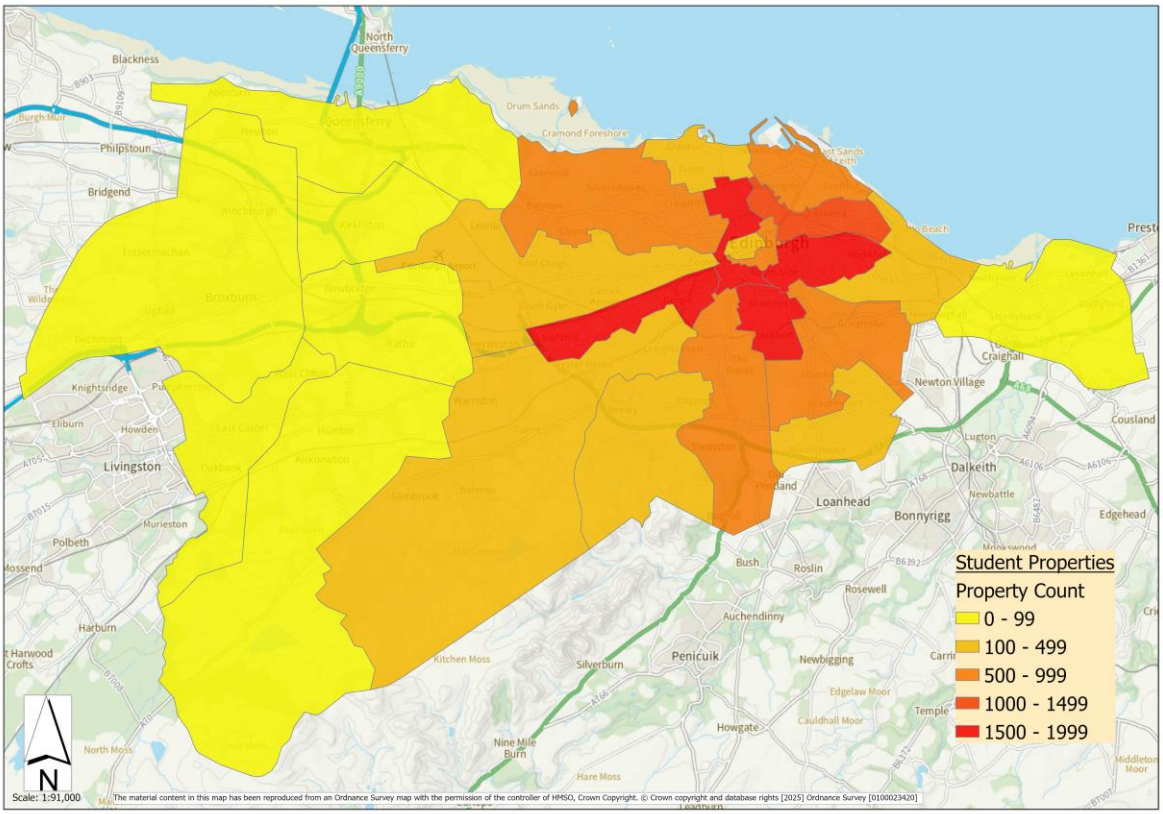


Figure 14.34: Student only households and households with all but one student April 2025

Overview

The private rented sector (PRS) makes up a significant proportion of student accommodation (24%) in total. Whilst nationally there has been a drop in the number of active landlords and only a slight increase in registered properties over the past 5 years, in Edinburgh the number of active landlords has increased by 8% whilst the number of registered properties has increased by 16.4%.

Whilst this may indicate a healthy market for providing PRS accommodation for students, the data also shows that 25% of landlords intend to decrease their number of properties or sell all their properties and leave the business. Only 4% indicated they intended to increase their number of properties. Many students living within the private rented sector are within houses in multiple occupation (HMOs). In 2024 there were 6,325 licences in force, almost 10% of all registered private rented homes in Edinburgh. As noted in Topic 13, there has been a fall in the number of licensed HMOs in Edinburgh in the last year. There is also pressure from the loss of residential accommodation to short term lets.

Concerns are also raised about how rents in the PRS have increased by 82% on average in Edinburgh over the last 10 years. In the last 18 months, Edinburgh has continued to experience the highest rental inflation of any UK major city. This is discussed in greater detail in the cost and affordability section below.

Whilst PRS and HMOs provide students with more flexible tenancy arrangements and a wider range of location choices compared to PBSA, and may allow for more affordable housing options further from campus, the quality of HMOs can vary widely, with some properties being poorly maintained.

Cost and Affordability

The average weekly private sector PBSA rent in Edinburgh is second only to London exceeding £200 per week (Cushman Wakefield UK Student Accommodation Survey 2023). Rents for studios are generally above those for en-suite rooms. Unipol's accommodation costs survey 2021 reports that the annual average rent of a studio in the UK was £9,534 compared with £6,451 for an en-suite room. The average price of a private sector studio bed in Edinburgh is reported to be £302.03, one of the most expensive weekly studio rents in the UK behind Manchester and Bristol.

There is a significant differential with university rents which in 2023 averaged £158 (Cushman Wakefield UK Student Accommodation Survey 2023). The Housing (Scotland) Act 2025 exempts PBSA from any rent control areas which may be introduced.

While limited in its sample size, the CEC Student Accommodation Survey indicates students are paying between £200 to over £1,000 per month. The largest cost cluster is £601–£800, representing almost half of respondents. Private renting and halls dominate current accommodation, while PBSA is identified as the most expensive option. However, prices and situations vary considerably.

Edinburgh has one of the the lowest percentages of all PBSA beds with rent below the average student maintenance loan at 61%, reduced from 90% in 2016. The proportion for private only PBSA is less at 42%, a reduction from 76% in 2015 indicating that Edinburgh has become less 'affordable'. (Cushman Wakefield UK Student Accommodation Report 2025).

As set out above a student co-operative operates in Edinburgh providing accommodation at lower cost than the private sector.

Knight Frank, Student Accommodation Survey, 2024 provides insight into the opinions and preferences of students about where and how they live. Results point towards affordability being the number one issue facing students in relation to accommodation. The indications were that there is a growing discrepancy between what a student is able to pay for accommodation, versus what they might have to pay because there are no alternatives. The proportion of full-time degree entrants coming from Scotland's most deprived areas has increased to the highest level on record (Widening university access, Scottish Government, January 2026, emphasising an increasing importance of affordability.

There is no provision in NPF4 requiring affordable student accommodation. An example of a requirement is provided by the London Plan Guidance – Purpose-built

Student Accommodation which requires 35% of PBSA units be affordable and defines this as no more than 55% of the maximum maintenance loan.

The Research on purpose-built student accommodation (PBSA) and student housing in Scotland, Scottish Government, December 2022 noted that there is limited data on variations in student housing affordability and that the sector needs robust and regular, data on students' economic circumstances and the affordability of different types of accommodation throughout Scotland.

Term time accommodation 2024/25

Figure 35 below shows that a total of 40% of students were living in PBSA, 30% in stock provided by universities (university-maintained property) and 10% in privately-owned stock (private- sector halls), during 2024/25 according to HESA data. 24% were renting from private landlords (other rented PRS), while 29% lived with parents or owned their own home. Privately owned PBSA therefore accounts for only a fractional share of the overall market.

However, the figure shows that the number of students living in private PBSA (private-sector halls) has risen by 5,235 (467%) since 2014/15. Over the same period, the number of students living in university-maintained PBSA stock rose by 49%. The numbers of students living at home, particularly in their own residence, has also increased.

It must be noted that there are some disparities between the PBSA numbers recorded in figure 10 and those in figure 25 below. While figure 10 indicates that there are 23,519 student beds available in Edinburgh, the numbers below suggest that there are 24,920 students living in PBSA. The disparity can perhaps be explained by the numbers of students that chose "not known" or "other" in the HESA survey.

Figure 10 also highlights that there are only 12,577 university maintained/owned beds whilst figure 25 suggest that 18,565 students lived in university PBSA. Again this can potentially be explained by students miscategorising their accommodation provider, potentially confusing university owned/managed PBSA with private sector PBSA.

	2014/15		**2024/25**	
Accommodation type	**Students**	**%**	**Students**	**%**
University maintained property (PBSA)	12,440	26	18,565	30
Private-sector halls (PBSA)	1,120	2	6,355	10
Other rented (PRS)	18,690	38	14,860	24
Parental/guardian home	7,320	15	9,445	15

Own residence	4,015	8	8,405	14
Other	1,755	4	1,780	3
Not in attendance at the provider	1,435	3	0	0
Not known	1,875	4	1,575	3
Total	**48,650**	**100**	**60,985**	**100**

Figure 14.35: Term time accommodation of full-time students 2014/15 and 2024/25 (source: HESA)

Term time accommodation varies between level of study. In 2024/25, 51% of 1st year undergraduates were living in university maintained PBSA properties, reflecting the accommodation guarantee provided by universities to 1st year students. Most returning students lived either in their own property, with parents or other privately rented accommodation. Only 6% of returners lived in private PBSA. 16% of postgraduate students were living in private PBSA, with 29% in university accommodation and 28% in other rented accommodation.

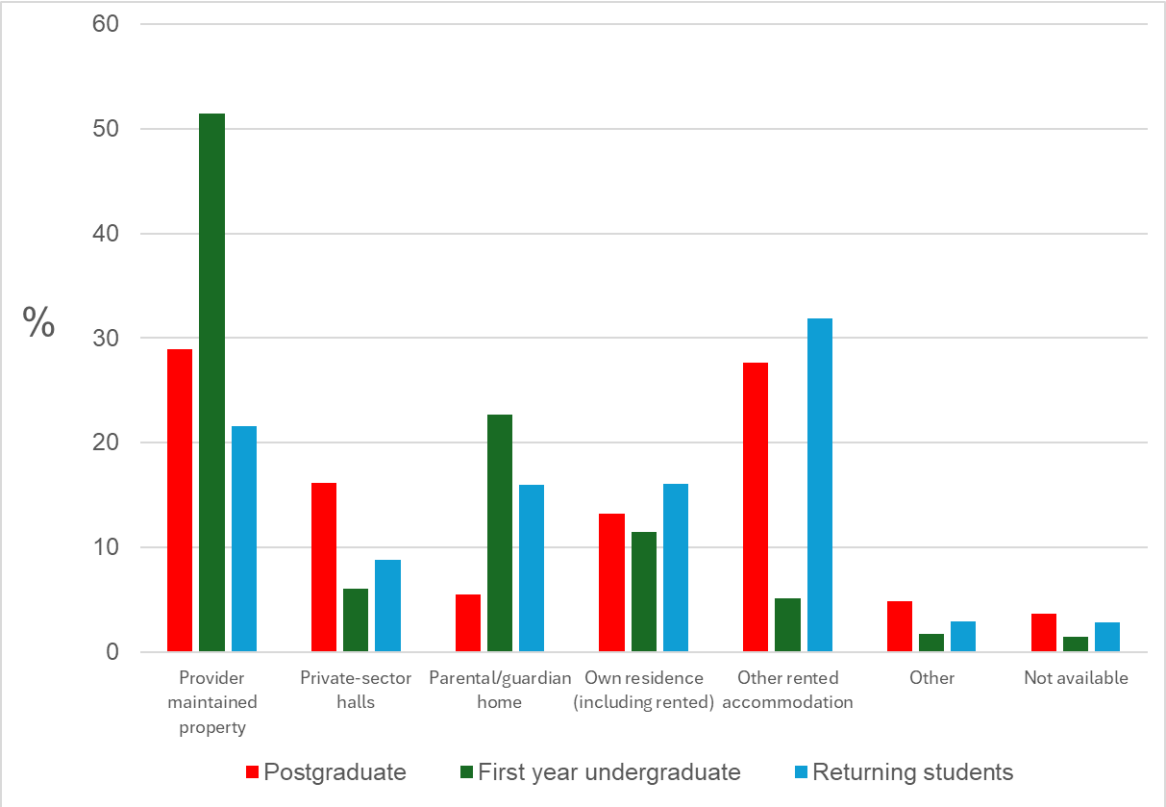


Figure 14.36: Term-time accommodation by mode of study 2024/25 (source: HESA)

Current need for student accommodation

An adequate supply of student accommodation is integral to the performance of the higher education sector. The sector plays a key role in the economy by producing

skilled workers, creating new intellectual property, producing innovative new companies, investing in real estate, and attracting visitors to the city. Reports by London Economics, Economic Impact of The University of Edinburgh, 2023 and London Economics Benefits and Costs of International HE Students estimate that the total economic impact on the UK economy associated with the University of Edinburgh's activities in 2021-22 was approximately £7.522 billion with a significant contribution from overseas students.

Calculating current need

There is no official method of calculating need for student accommodation. Needs assessments submitted in support of planning applications employ a variety of methods and provide differing estimates.

Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing prepared by CaCHE provides an estimate of the demand for and supply of PBSA in Edinburgh. Based on HESA data at 2022 and a student bedspace ratio (SBR) of 1.5, it identified an existing 'shortfall' of 13,852 student bedspaces in Edinburgh in 2022/23.

Students	
Total full-time students 2022/23	**63,640**
Less living with parents 2022/23	7,030
Less living own residence 2022/23	4,095
= **Estimated demand pool 2022/23**	52,515
PBSA	
PBSA supply at 2022	21,158
Student to bedspace ratio demand pool	2.48
Shortfall to get to 1.5 STB -demand pool only	13,852

Figure 14.37: CaCHE calculation of shortfall (source: Student housing options and experiences of homelessness report (CaCHE))

The report notes that a ratio of 1.5 students to 1 available bed is the accepted standard measure as this allows for those who opt for an HMO or other private rented options outside of the PBSA remit, however, as the volume of available HMOs has reduced it would be pertinent to consider how this ratio might need to be adjusted if the trend for HMOs exiting the market continues.

Applying the same methodology as CaCHE and utilising the latest available data from HESA and Council gathered figures a shortfall of 5,238 student bedspaces in Edinburgh in 2024/25 is estimated.

Students	
Total full-time students 2024/25	**60,985**
Less living with parents 2024/25	9,445
Less living in own residence 2024/25	8,405
= **Estimated demand pool 2024/25**	43,135
PBSA	
PBSA at December 2025	23,519
Student to bedspace ratio demand pool	1.83
Shortfall to get to 1.5 STB - demand pool only	5,238

Figure 14.38: *Estimate of shortfall 2024/25 (source: Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing)*

The most recent Joint Universities response (as agreed by The University of Edinburgh, Heriot Watt University, Napier University and Queen Margaret University) to engagement on this topic paper notes that according to their figures between 2021/22 and 2024/25 the adjusted demand pool in Edinburgh reduced by approximately 3,750 falling from 51,707 in 2021/22 to 47,951 in 2024/25.

The Joint Universities demand pool figure of 47,951 for 2024/25 is higher than the demand pool figure of 43,135 calculated in figure 28. This can be partially explained by the Joint University calculating that there are 21,683 PBSA beds in Edinburgh in 2024/25 compared to the 23,519 PBSA beds calculated in figure 10. This disparity may be explained by the fact that figure 10 includes the 800 bedspaces at QMU which lie outwith the Edinburgh boundary and that the data used for figure 10 was captured at the end of 2025 (December) instead of a 2025 mid-year estimate. The Joint University response may also have used different figures for students living with parents and living within their own residencies.

The Joint Universities have also utilised a different method in order to calculate shortfall. It states that according to its data to reach the UK average ratio of 2.05 students per PBSA bed, Edinburgh would need approximately 935 additional beds. If Edinburgh was to reach the peer city average ratio of approximately 1.9 students per PBSA bed, the city would require an additional 3,554 beds.

While limited in its sample size, results of the Student Accommodation Survey indicate students in Edinburgh find it difficult to secure accommodation due to affordability and demand for private rented properties. Research by Students for Action on Tackling Homelessness in Edinburgh (SLURP) referenced within the Student housing options and experiences of homelessness in Scotland: a report by the Cross-Party Group on Housing suggests that up to 16% of Edinburgh's student population experienced homelessness at the start of semester 2023/24 as they struggled to find suitable accommodation.

At start of 2024/25, occupancy was between 95% - 99.5% in university operated housing. (Student Living Report). At the latest meeting of the Student Accommodation Strategy Partnership there were indications that some voids had occurred in the 2025/26 period, though this was not at a significant level.

It should also be noted that occupancy can vary throughout the academic year.

Future need for student accommodation

HNDA3 does not include for the need/demand for the student population. HNDA3 is based upon household projections (Household Projections for Scotland (2022-based): Methodology Guide. In determining household projections, the number of people living in PBSA and other communal establishments are deducted from the population projections. Any need to provide for students is therefore additional to the needs of households.

HESA data shows that after a period of relatively steady growth in full-time students numbers between 2014/15 and 2021/22, there has been a sustained gradual reduction in the number of full time students attending the 4 major higher education providers in Edinburgh since 2021/22. Whilst the most up-to-date data obtained from the Universities suggests that there has been an increase in student numbers between 2024/25 and 2025/26, this increase is only 0.6% and their full time student numbers for 2025/26 are still below those produced by HESA for the two previous years. The data does not suggest a return to the growth in numbers seen between 2014/15 and 2021/22.

In December 2025, there were a total of 23,519 PBSA bedspaces in Edinburgh. This number includes all university owned/managed sites as well as those run by the private sector and third sector. It also includes the 800 bedspaces at QMU which are outwith the Edinburgh boundary.

There has been a 41% increase in the number of all PBSA bedspaces in the last ten years (from 16,698 to 23,519). Growth has been driven by the private sector. The highest completion rates per annum were experienced in 2015-2017. There were 921 PBSA bedrooms completed in 2025. Whilst this is an increase in the numbers from 2023 and 2024, it is a decline from 2022 and the period between 2015 and 2017. The Joint University reponse notes that they have evidence that the pace of PBSA delivery is slowing.

2025 also showed a fall in the numbers of applications for PBSA compared with 2024 and represented the lowest level of PBSA applications since 2021.

Whilst the data suggests a slow down in developer appetite for PBSA ,it must still be noted that the levels of applications are still higher than they were between 2016-2018 and that the applications granted in 2025 still represented 1,586 PBSA bedspaces.

Over the past 5 years in Edinburgh the number of active landlords has increased by 8% whilst the number of registered properties has increased by 16.4%. Whilst this may indicate a healthy market for providing PRS accommodation for students, the data also shows that 25% of landlords intend to decrease their number of properties

or sell all their properties and leave the business. Only 4% indicated they intended to increase their number of properties.

Many students living within the private rented sector are within houses in multiple occupation (HMOs). In 2024 there were 6,325 licences in force, almost 10% of all registered private rented homes in Edinburgh. As noted in Topic 13, there has been a fall in the number of licensed HMOs in Edinburgh in the last year. There is also pressure from the loss of residential accommodation to short term lets.

The Student Living Report prepared by Edinburgh's universities in August 2025 notes that based on the current projections, no accommodation growth is planned by universities but there is still a requirement for new student accommodation to ease demand pressure on private rented tenancies.

It notes continued geo-political pressures around graduate route visas and proposed levies on international student income, may have an impact on international student numbers and, as a consequence, university funding. Scottish Government funding for teaching, via the Scottish Funding Council, has been reduced between 2023-24 and 2024- 25, coupled with loss of European Union funding post-BREXIT. These factors continue to change the demographics of the student mix. The make-up of students will have an impact on the requirements with much of the demand for PBSA from international students. The age of students may also impact on the type of accommodation sought.

The CaCHE methodology utilising HESA and Council gathered figures produces an estimated current shortfall of 5,238 student beds within Edinburgh. The Joint Universities data calculates that there is currently a shortfall of between 935 and 3,554 beds within Edinburgh depending on what ratio of students per PBSA beds is utilised.

Regardless of what figures above are accepted, the Edinburgh's pipeline of 5,917 PBSA beds, with 1,345 under construction, 3,087 with consent and a further 960 minded to grant, would exceed any of the identified current shortfalls identified above.

However, as the Joint Universities submission notes, it is important to recognise that not all consented schemes ultimately proceed to construction, particularly in the current development environment where construction costs, financial constraints and development viability remain challenging.

As the Research on purpose-built student accommodation (PBSA) and student housing in Scotland, Scottish Government, December 2022 states, student accommodation is a complex, interdependent system interacting with local housing systems and communities. In recent years, there has been a declining availability of private rented properties which may impact on need for PBSA. There is uncertainty in projecting student number especially due to the volatile international student market. The volatility of student numbers and the complexity of the student accommodation market means that precision is difficult, however the emerging evidence points to more of a balance of student numbers and accommodation need

which the Proposed Plan will need to consider in any proposals or policy. This will also take into account any updated data as appropriate.

Summary of stakeholder engagement

The comments summarised have been taken account of through inclusion in evidence sources and analysis or noted for consideration as the part of preparing the Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Scoping (May 2025):** Homes for Scotland (HfS) considers that any loss of sites allocated (or included in the supply) for homes to student accommodation should be covered • **Final Topic Papers (March 2026):** HfS does not dispute the evidence set out in the schedule, however, it cites the London Economics Benefits and Costs of International HE Students report as a further evidence source. HfS considers that there is competition for sites for a range of uses and considers that the Council should allocate sites for PBSA to prevent an erosion of the Local Housing Land Requirement for housing. HfS also requests that the Council identify how many opportunities for residential development have been lost to PBSA development. HfS refers to the Council noting the limited and uncertain data on student accommodation due to several factors, including the volatile nature of the international student market. HFS therefore encourages the Council to engage with higher education institutions to obtain regular, robust data on student housing needs to inform suitable site allocations, which it considers essential in the context of a national and a local housing emergency. HFS requests that it be consulted on any Council policy framework or land allocations for student accommodation.
Council response and implications for the proposed plan	The Council has previously acknowledged the benefits of the Higher Education sector as a whole, notes the study referred to and that this is reflected in the evidence baseline, which includes the same source's paper on Edinburgh University, also from2023.

	On the request for the number of sites where residential development is prejudiced, Figure 25 notes where allocated housing sites have had PBSA approved, noting that in those cases it is still considered that the relevant housing numbers can be provided on the remaining land. The consideration of whether or not to allocate sites for PBSA is a matter for the proposed plan The Council has had significant engagement with all stakeholders for Higher Education and Student Accommodation and will continue this through the Student Accommodation Strategic Partnership Policies and proposals in the proposed plan will be subject to engagement and statutory consultation.
Is the agency content with the evidence?	HFS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Proposed Plan will need to consider the implications of the balance of student number trends and the locations, types, availability and affordability of student accommodation in Edinburgh and the pipeline of supply which may be delivered.

Other engagement and matters raised

The University of Edinburgh: The University considers there should be explicit support for the development of PBSA, however, this needs to be undertaken in a manner which reflects the current needs and demands of the student population and in a sustainable manner, and in locations where development can be integrated successfully into its surroundings.

There should be recognition of the need for flexibility in approach, and allow university plans, programmes and initiatives to evolve and adapt to changing circumstances in higher education, the nature and requirements of the student and staff population, and to reflect the economic and social circumstances on a local, regional and national basis .

It states that PBSA should be located on sites that have good access by public transport and active travel routes to further and higher education institutions.

It notes that research by Cushman and Wakefield indicates an ongoing shortfall of student rooms, whilst also depicting vacancies across the city.

It considers it important to understand what the true capacity of need is for PBSA in comparison to HMOs.

The University highlights the importance of flexibility to respond to market need and the requirements of mature, international, or neurodivergent student who may prefer their private space.

It encourages the Council to formally recognise combined Universities' Living Strategy.

It considers the requirement to provide 50% residential housing is untenable for university owned and operated PBSA. suggested that University owned and operated PBSA developments should receive a distinct categorisation or classification.

States there should be scope to explore affordable provision at the proportionate level but not to hinder the market.

Suggests there is opportunity to explore "Areas of Encouragement" for PBSA development, as opposed to 'Areas of Concentration'.

States there is potential for PBSA developments to be located in areas where regeneration can be encouraged, utilising areas that are not currently populated by students. Sees a need to further determine what constitutes an adverse impact on the established character of an area.

CEC Response: The Council has a criteria-based policy for PBSA which allows for development appropriate to responding flexibly to changing contexts for PBSA. It continues to work with the University, the Student Accommodation Strategy Group and other stakeholders to understand changing circumstances, including the needs of all students, the types of accommodation and their availability.

Locational and transport considerations are part of the Council's current approach, as is the provision of housing on larger sites, these are matters for the proposed plan to review. That applies also to the considerations of affordable PBSA provision and the suggested are based approaches to managing locations. Also the matter of any change to assessing impact on the character of an area.

The Council includes the Cushman and Wakefield research mentioned and the Combined Universities Living Strategy.

The Proposed Plan needs to consider the implications of the balance of student number trends and the locations, types, availability and affordability of student accommodation in Edinburgh and the pipeline of supply which may be delivered.

Watkins Jones: That the plan should recognise that the need for PBSA does not directly correlate with the number of students attending universities, which may fluctuate, and that there are wider trends

It suggests that continued delivery of more PBSA units may result in HMOs returning to the city's wider housing stock, benefitting the city as a whole and potentially providing family housing

CEC Response: The Council continues to work with relevant stakeholders and notes the comments. Any review of existing policy is a matter for the proposed plan. The Proposed Plan needs to consider the implications of the balance of student number trends and the locations, types, availability and affordability of student accommodation in Edinburgh and the pipeline of supply which may be delivered.

Network Rail: Identifies significant evidence source:

- HESA Statistics CEC Student Accommodation Schedules
- Scotland's Census 2022
- Scottish Government Housing Statistics Scottish Government, Research on purpose-built student accommodation (PBSA) and student housing in Scotland, December 2022
- Cross-Party Group on Housing, Student housing options and experiences of homelessness in Scotland, September 2024

Heriot Watt University Student Union:

Should HMOs continue to decline and PBSA continues to be delivered primarily at price points many students cannot afford, what assumptions are we making about where displaced students will live.

Should clearly outline the economic and social impact of student displacement not only on the individual but also on the student i.e. how much financially does the city spend and miss out on.

Helpful to explicitly test whether PBSA can realistically absorb HMO displacement at current rent levels, rather than assuming this will happen.

Explore why landlords are exiting from the PRS and declining HMO availability,

Is there research underway on why HMO landlords are leaving the student market specifically.

Are there local policies or licensing flexibilities that could stabilise HMO supply without undermining standards or leading to rent increases?

How can HMOs be retained or re-entered into the market in a way that protects students from excessive rents or poor conditions?

Should be mentioned and reviewed what the guideline is for luxury

Understand why more students are commuting rather than living in Edinburgh.

How do cost, proximity to campus, safety, and access to services influence student housing choices?

More explicitly recognise the economic contribution of students as residents, not just temporary occupants.

A stronger role for housing co-ops in meeting affordability gaps

Active exploration of how councils and universities could support co-operative expansion

Whether long-term planning policy could better enable non-market student housing models

Consider whether there are circumstances in which existing PBSA stock could transition into co-operative or non-profit ownership, for example, if a provider sells assets or exits the market.

C**EC Response:** Where quantitative and qualitative data has been available, this has been incorporated to ensure there is an understanding of issues from a student's perspective. The Council will continue to work with stakeholders to understand and explore the issues of student accommodation types, availability and affordability in Edinburgh. The proposed plan needs to consider the implications of the evidence on these factors alongside updated student numbers.

Edinburgh Student Housing Co-op: The Co-op considers that the draft topic paper provides a good overview of the current student housing situation in terms of both student housing provision and planning context

It would be good if the report could provide some more figures on the rents, and living conditions if there are data available, faced by students across the sector, and not just in private PBSA.

CEC Response: Where quantitative and qualitative data has been available, this has been incorporated to ensure there is an understanding of issues from a student's perspective. The Council will continue to work with providers, institutions and students through the PBSA Strategy Partnership. The proposed plan will need to consider affordability issues and whether there are any mechanisms to address this.

Student Accommodation Strategic Partnership:

A meeting of the partnership in January 2026 was attended by representatives from all Edinburgh's universities, providers, student bodies and the Council's Housing and Planning services. This raised issues for consideration in the preparation of the

evidence report and future plan. A range of comments were made related to student accommodation in general. These included:

- Need for a definition of what is affordable
- Providers open to exploring how accommodation could be made more affordable
- PBSA needed to free up general housing
- Reduction in HMO supply needs to be considered
- Need to consider needs of continuing students and provision of choice
- Consider if there is a more affordable way to create space - shared rooms, facilities, less focus on high end facilities.
- Change in student accommodation landscape – voids in university properties which have not been experienced in previous years
- Misalignment between affordability and what students need
- Need for flexibility, shorter lease lengths
- Market is volatile
- Some PBSA consents unimplemented
- Changing demographic of students
- Time from the outset of the development/design process means there is a disconnect between what has been consented and what students need
- Need to take account of needs of commuter students. Some students choose to live at home
- Decrease in number of students stating on in university accommodation- need to explore reasons
- May be potential for a hotel type model
- Volatility in terms of student numbers, political environment.
- Potential for modular buildings-cheaper forms of construction
- Consider potential for shorter lease lengths and utilising PBSA for alternative uses outwith leases
- Continuing challenge of development costs.
- Need to consider what a student might look like in 2040 and what form teaching might take- shorter stay accommodation may be required
- Much of the existing accommodation is becoming dated and will need investment.
- Need to build PBSA that can be adapted to other uses
- Consider role of co-living

The University of Edinburgh, Heriot Watt University, Napier University and Queen Margaret University - Joint Universities Response:

Student Accommodation and the City Plan 2040 on Key Considerations for the Future Provision of Student Housing in Edinburgh. The response considers the market is dynamic and sensitive. It is frequently discussed using headline ratios of

students to PBSA beds which are useful indicators but can mask volatility that can shift in relatively short periods of time. Recent updated analysis indicates the underlying demand/supply position has moved materially since the previous baseline Between 2021/22 and 2024/25 student numbers reduced by approx.3,750 students (51,707 to 47,951) whilst PBSA beds in Edinburgh increased by 2,498 (19,185 to 21,683). a swing of approximately 6,248 beds over two years reinforcing the need for regularly updated data to inform planning decisions. Current supply remains modestly below national and peer benchmarks with a substantially reduced undersupply compared with 2024 modelling. To reach the UK average ratio of 2.05 students per bedspace needs 935 additional. To reach the peer city average of 1.9 students per bedspace needs 3,554 additional.

The response notes a rising trend in commuting students in parts of the UK, citing possible factors: rising cost of living, accommodation affordability, and changing student preferences for study patterns and travel. Also notes the joint Universities are undertaking work to understand if similar trends are emerging locally which could reduce demand for PBSA and HMOs and influence overall market balance.

The response notes 4,575 PBSA beds are approved within the development pipeline (1,136 scheduled to complete in current year). If all delivered without demand increase, bedspaces could exceed benchmark ratios, noting not all consented schemes will necessarily be built and pace of delivery appears to be slowing, given the financial context.

The HMO sector is considered a significant but least understood factor in the Edinburgh market. Its scale means relatively small changes in HMO availability can have disproportionate impacts on PBSA demand and perceived supply shortages. It recommends the Council commission study of the HMO supply and PBSA demand relationship, acknowledging small changes in other related accommodation types can have similar impact on PBSA demand, including the wider private rented sector, changes in university strategies, fluctuations in international student recruitment, and broader cost-of-living pressures affecting choices. It therefore advises that policy decisions based on static assumptions risk becoming quickly outdated, with monitoring essential to ensure planning policy remains aligned with real market conditions, including the following:

- Size of the student demand pool
- PBSA supply and development pipeline
- Student to PBSA bed ratios
- HMO supply and utilisation
- Rental affordability across PBSA and the wider rental market
- Other push-pull factors
- University growth plans

It advises establishing a regular data-sharing process with the city's universities and market analysts, to achieve this.

The response advises that affordability is increasingly a significant challenge, with parts of the PBSA market focused on higher specification developments with higher rental levels, not always meeting the core needs of the majority of students, with undersupply exacerbating this issue. It suggests planning policy should support a broader range of accommodation types and ensure that affordability remains central to decision making.

The paper concludes that although near-term projections suggest limited student growth, City Plan 2040 should retain flexibility to accommodate growth given Edinburgh's universities global status so that growth opportunities should not be constrained by policy.

CEC Response: The Council acknowledges that student numbers are subject to demand fluctuation, that PBSA bedspace numbers are increasing and that the ratios will continue to change. There is a need to consider whether the next Plan continues the policy based approach of City Plan 2030, amends that policy approach with a consideration of recent data or amends in some other way.

The council will consider emerging evidence on both demand and supply for PBSA and other accommodation types used by students, including HMOs and updated trends will need to be considered at the Proposed Plan stage.

The Council acknowledges there are complex interactions within the student accommodation sector. How these could be better understood will be taken forward through the Student Accommodation Strategic Partnership.

Questions of affordability are for consideration in preparing the Proposed Plan in terms of emerging evidence, given the market shifts identified and any national considerations.

The Proposed Plan needs to consider the implications of the balance of student number trends and the locations, types, availability and affordability of student accommodation in Edinburgh and the pipeline of supply which may be delivered.

Student Accommodation Strategic Partnership: members asked whether student unions have any information on number of students commuting each day. Edinburgh University Student Association stated it is gathering evidence of which students are in PBSA, and which are likely to be commuting.

University of Edinburgh advised it had some student accommodation voids (around 200 rooms) in the last year. Queen Margaret advised their occupancy was high. Scottish Property Federation have asked private PBSA operators about void rates on behalf of the Council but had not yet had responses.

CEC Response: The Council notes that affordability and availability are increasing shared concerns, though affordability needs definition and also options, perhaps

including co-living models. Also, that student commuting may be rising and University of Edinburgh Student Union is working on quantifying this.

Adaptability for both future student needs and for alternative uses is addressed in City Plan 2030 policy and the approach to this can be further considered

Some decline in student numbers and a perceived rise in commuting students may be linked to some increased experiencing of voids by providers.

Consider measure of affordability, adaptability and future potential models though plan process

The Proposed Plan needs to consider the implications of the balance of student number trends and the locations, types, availability and affordability of student accommodation in Edinburgh and the pipeline of supply which may be delivered.

Place Engagement:
An online consultation was carried out to seek the views of students on their experience of accommodation and living in Edinburgh. A total of 222 student responses were received from students studying and living within the Edinburgh area. Results from the survey are summarised within the Local Context section of this report, set out in full in the Student Accommodation Analysis Report and have been taken into account in the summary of evidence. Key issues raised:

- Difficulties in finding accommodation due to competition for properties and lack of suitable accommodation
- Challenges for international students due to guarantor requirements
- A challenge of affordability with students describing rents across PBSA and rented sector as unaffordable
- That poor quality of accommodation is not reflected in rent levels
- More affordable accommodation is often located far from campus
- Wide ranging accommodation costs per month range from less than £200 to over £1,000
- The lack of disabled-friendly accommodation and limited housing options suitable for postgraduates, families or mature students.
- A preference for private rented accommodation with reasons including the ability to choose who to live with, independence, freedom from hall restrictions, better value and ability to remain over summer
- Locational preference for accommodation close to place of study with good transport links, access to shops and services, safe neighbourhood and access to greenspaces
- Preference for a room in a shared flat, considered by some to be the most affordable option
- Studio accommodation can be valued for personal space and reduced conflict with flatmates

- Support for mixed housing and reducing segregation which can be caused by student-only accommodation and having shared space to enable natural interaction between students and the wider community.

Summary of implications for the proposed plan

In the absence of NPF4 policy and the specific nature of the Edinburgh property market and significant presence of universities, it is likely that continuation of a local policy approach for purpose built student accommodation will be required.

The evidence shows there may be an emerging balance between student numbers and those seeking accommodation across all sectors. However, the evidence indicates that there is some uncertainty in future student numbers. Should student numbers increase, and the approved pipeline of accommodation of PBSA is not realised, a significant gap could emerge.

The volatility in student population and emergence of new forms of PBSA mixed with other uses, indicate that a flexible policy approach in terms of use and design may be required in the Proposed Plan to accommodate the uncertainties in the student accommodation market and adaptability to alternative uses.

New data on student numbers, the impact of student commuting and market for student accommodation types will continue to be assessed and monitored to inform the Proposed Plan.

Evidence shows that accommodation is unaffordable for many students. Affordability should be explored and consideration given to policies which could address affordability.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

15: Local living

Topic	**15: Local living**
Description of topic	Review of the extent to which areas are enabling people to live well locally.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5)(a) - the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district • Section 15 (2A) a statement of the planning authority's policies and proposals as to the provision of public conveniences. • Section 15 (2B) a statement of the planning authority's policies and proposals as to the provision of water refill locations.
Relevant NPF4 Policies	• Policy 13 Sustainable transport • Policy 14 Design, quality and place • Policy 15 Local living and 20 minute neighbourhoods • Policy 20 Blue green infrastructure • Policy 21 Play, recreation and sport • Policy 25 Community wealth building • Policy 27 City, town, local and commercial centres • Policy 18 Retail
Local Development Plan Guidance	• Understanding of existing settlement patterns, considering the characteristics and challenges faced by places with respect to local living. • The locations of facilities that are used for community functions, such as for the purposes of sport, leisure, arts and cultural activities, or to support lifelong learning or social interaction. • The locations of facilities that are used for support services within a community for health and wellbeing including visiting health services, clinics, support and advice services and childcare provision. • Review of previous engagement.
Linked Topic Papers	• Topic 01a Infrastructure - transport • Topic 01b Infrastructure - education • Topic 01c Infrastructure - health and social care • Topic 06 Green blue infrastructure, open space and recreation • Topic 08 and 09 Climate change and climate mitigation • Topic 10 Historic assets and places • Topic 11 Design, quality and placemaking • Topic 12 Housing land • Topic 13 Specialist and other accommodation

	• Topic 14 Student accommodation • Topic 16 Health and wellbeing • Topic 17 Community wealth building • Topic 18 Economy, business and industry • Topic 19 City, town, local and commercial centres • Topic 20 Tourism, culture and creativity • Place Profiles
List of and links to evidence	• **CD205** Scottish Government Planning Guidance: Local living and 20 minute neighbourhoods, Scottish Government, April 2024 • **CD174** Place Principle, Scottish Government, April 2019 • **CD175** Place Standard, Scottish Government, June 2024 • **CD523** Briefing: Place and Wellbeing Outcomes, Improvement Service, October 2024 • **CD238** 20-Minute Neighbourhood: Living Well Locally, City of Edinburgh Council, August 2023 • **CD066** Non Statutory Guidance - Edinburgh Design Guidance, City of Edinburgh Council, September 2025 • **CD071** Non Statutory Guidance - Student Accommodation, City of Edinburgh Council, September 2025 • **CD076** City Mobility Plan2021-2030, City of Edinburgh Council, February 2024 • **CD333** Open Space 2021 – Edinburgh's Open Space Strategy, City of Edinburgh Council, December 2016 • **CD339** Physical Activity and Sport Strategy for Edinburgh 2024 to 2034, City of Edinburgh Council, December 2024 • **CD313** Growing Locally - Edinburgh's Food Growing Strategy 2021 – 2026, City of Edinburgh Council, April 2021 • **CD083** 2030 Climate Strategy, City of Edinburgh Council, December 2021 • **CD082** Edinburgh Economy Strategy, City of Edinburgh Council, November 2021 • **CD451** A Just Capital: Actions to End Poverty in Edinburgh, Edinburgh Poverty Commission, September 2020 • **CD307** End Poverty in Edinburgh Delivery Plan 2030, City of Edinburgh Council, December 2020 • **CD525** Integrating land use planning and child poverty, Improvement Service, March 2026 • **CD666** The Edinburgh Partnership Community Plan 2022-2028, Edinburgh Partnership, February 2022 • **CD583** NHS Lothian Public Health. A strengthened approach to prevention across the Lothian health and care system, NHS Lothian, August 2024

	• **CD274** Corporate Property Strategy, City of Edinburgh Council, August 2023 • **CD264** Citywide Culture Strategy 2023-30, City of Edinburgh Council, December 2022 • **CD297** Edinburgh Street Design Guidance, City of Edinburgh Council, March 2022 • **CD389** Women's Safety in Public Places Community Improvement Partnership Annual Update Report, City of Edinburgh Council, May 2024 • **CD287** Edinburgh as a Feminist City Working Group Update Committee Report, City of Edinburgh Council, January 2026 • **CD372** The City of Edinburgh Council Scheme for Community Councils, City of Edinburgh Council, March 2025 • **CD072** Non Statutory Guidance - City Centre and Town Centres, City of Edinburgh Council • **CD122** Circular 1/2022: Local Place Plans, Scottish Government, January 2022 • **CD050** Edinburgh's Local Place Plans Register, City of Edinburgh Council • **CD100** National Planning Framework 4, Scottish Government, February 2023

List of matters covered

This topic paper sets out the evidence in relation to local living. It sets out the evidence on which facilities are required to enable people to meet most of their daily needs. It also sets out evidence on the access to these facilities and services across Edinburgh. It covers:

- National Context
    - Scottish Government Planning Guidance
- Local Context
    - Edinburgh 20-Minute Neighbourhood Strategy
    - Local Living Framework
        - Movement
        - Space
        - Resources
        - Civic
        - Stewardship
- Place-Based Approach
    - Place Profiles

Summary of evidence

National Context

Scottish Government Planning Guidance - Local Living and 20 Minute Neighbourhoods

In April 2024 the Scottish Government published planning guidance on Local Living and 20 Minute Neighbourhoods. It defines local living as providing 'people with the opportunity to meet the majority of their daily needs within a reasonable distance of their home.' 20-minute neighbourhoods were introduced as a concept as one of many ways to support local living. The timeframe of 20 minutes is derived from research undertaken in fields of health and wellbeing, urban design and planning. It is based on a walk of approximately 10 minutes to a destination and a return journey of 10 minutes, but this is not intended to be prescriptive. The benefits of local living are explored, including as a response to the climate and nature crisis, reducing health inequalities, improving local economies and liveability and quality of life.

The guidance emphasises the importance of assessing both the quality of services, amenities and facilities as well as the quantity available. The guidance introduces the Local Living Framework, which is aligned with the Place Standard and the Place and Wellbeing Outcomes. Key considerations are given for each of the 14 themes, which sit within 5 overarching categories of Movement, Space, Resources, Civic and Stewardship.

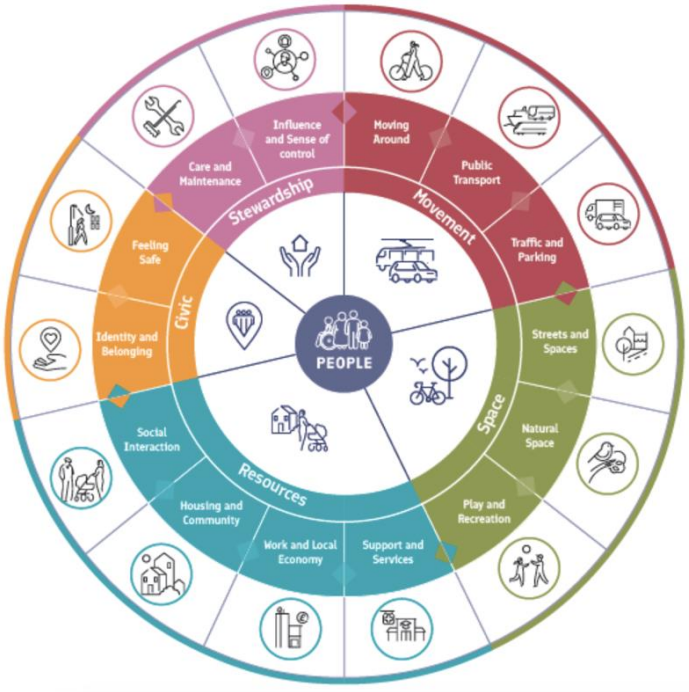


Figure 15.1: Local Living Framework (source: Scottish Government Planning Guidance)

The guidance sets out the importance of tailoring the local living approach to the specific daily needs of the relevant communities. It also emphasises the importance of considering the following:

- **Quantitative data**.
    - Spatial mapping and Geographic Information Systems (GIS) that looks at the provision of facilities, services and amenities required for daily life and whether they can be accessed within a reasonable distance
    - Scottish Index of Multiple Deprivation
    - Census data
- **Qualitative data**
    - The views of the local community, businesses and service providers using tools such as the Place Standard
    - Information from previous community engagement

Place Principle

In April 2019 the Scottish Government and the Convention of Scottish Local Authorities (COSLA) agreed to adopt the Place Principle. This recognises the following:

1. Place is where people, location and resources combine to create a sense of identity and purpose and is at the heart of addressing the needs and realising the full potential of communities
2. Places are shaped by the way resources, services and assets are directed and used by the people who live in and invest in them
3. A more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place, enables better outcomes for everyone and increased opportunities for people and communities to shape their own lives.

Local Context

Edinburgh 20-Minute Neighbourhood Strategy

The 20-Minute Neighbourhood Strategy was first approved by City of Edinburgh Council in June 2021 and updated in August 2023. The 20-minute concept is defined for Edinburgh as referring to a 20-minute round trip. The strategy emphasises that a flexible approach is needed and the distance that people will be willing to walk or wheel will vary, with different needs and expectations in urban, suburban and rural communities.

Figure 15.2: The 20-minute neighbourhood concept in Edinburgh

The approach set out in the strategy, includes the following 'building blocks':

- Working with local communities
- Supporting people to access the services they need locally
- Providing multiple services and facilities from a single location
- Delivering mixed-use regeneration and development
- Making our town and local centres greener, more inclusive and people-focused
- Supporting local economies and businesses
- Improving sustainable and active travel access to services and facilities.

The City of Edinburgh Council worked with Ramboll to build a 20-Minute Neighbourhood Mapping Tool. The aim of this interactive tool was to assess how well different areas across the city allow people to live locally. It measured using census output areas.

The tool generated a score for each of the 14 Place Standard categories using a combination of measuring several quantitative features and scoring from qualitative indicators. For example, the Natural Space category was scored on the number of nearby open spaces, trees and surface water features as well as the Parks Quality Assessment. The scores for each of the 14 categories were amalgamated into an overall score for each census output area. A visual mapping tool was created to display this information.

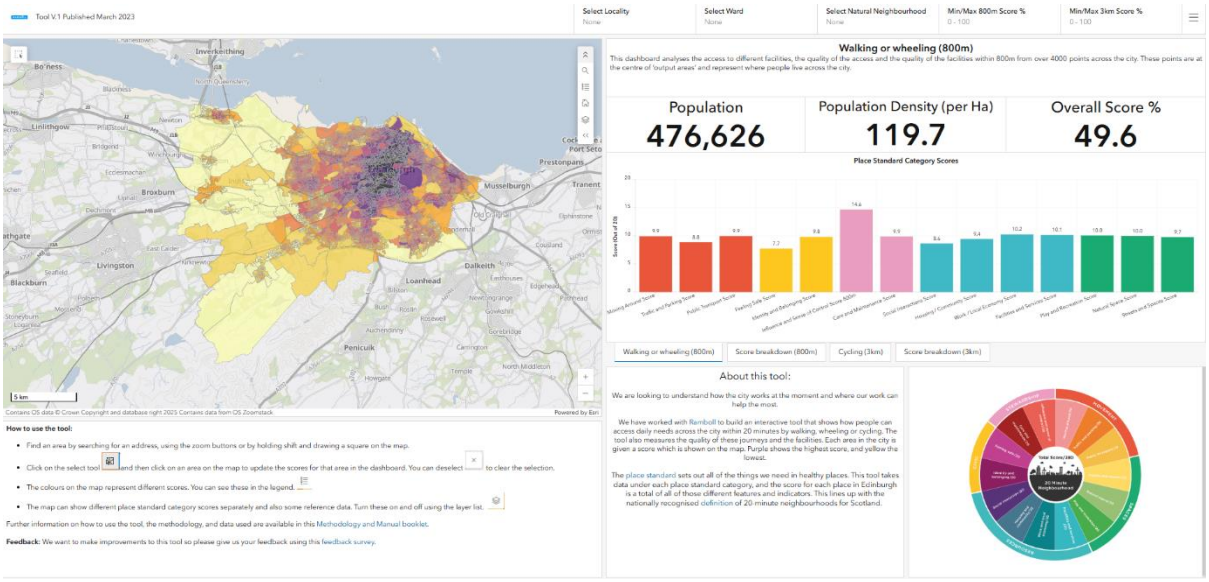


Figure 15.3: City of Edinburgh 20 Minute Neighbourhoods Baseline Study Tool

Local Living Mapping

Taking account of this tool, the Council has mapped local services and facilities across the city which people need to meet their daily needs. This mapping work provides a visual representation of which areas are well-provided, which areas are not and what key facilities or services might be missing in terms of local living.

There is no consensus or fixed template that lists what is needed to live well locally but the 20-Minute Neighbourhood Strategy outlines that for most people, the services and facilities are defined as:

- schools and lifelong learning opportunities
- local centres, shops and employment opportunities
- advice and support services, health and social care facilities
- community and cultural spaces, public toilets
- greenspaces and playgrounds, opportunities for food growth, sport and recreation facilities
- safe, high-quality walking, wheeling and cycling networks
- access to public transport.

The Place Profiles which form part of the Evidence Report contain this information for each ward. Through qualitative and quantitative information, each Place Profile assesses how well that ward is working in terms of living well locally and creating a good place to live.

The Edinburgh Design Guidance

The Edinburgh Design Guidance is non-statutory planning guidance which gives additional information on the policies of City Plan 2030. The current version was

approved by Planning Committee on 10 September 2025, following public consultation from 9 January to 4 April 2025.

The Edinburgh Design Guidance sets out the Council's expectations for the design of new development. It includes a chapter on 'Living Well Locally'. The following are listed as key facilities to have within a short walking/wheeling distance of a housing application: primary school; local green space; equipped play area; sport and recreation facilities (e.g. leisure centre, bowling green, swimming pool, football pitch); health centre (GP or pharmacy); local shops (including the nearest food shop); community facilities (e.g. community centre, library, church hall, community garden); bus or tram stop.

These facilities are used to generate a 'walkability ratio' for development that includes housing. The walkability ratio is how many of the key facility categories can be met within a relevant walking/wheeling distance (400m for bus or tram stops and local green space, 800m for the other key facilities). The quality of both the facilities and the routes to them should be assessed alongside the walkability ratio.

Both the Edinburgh Design Guidance and the local living mapping within the Place Profiles will be used to help assess how well people can meet their daily needs within a local area and whether the Proposed Plan can help meet any gaps in provision.

Student Accommodation Guidance

The Student Accommodation Guidance sets out the Council's expectations for purpose-built student accommodation (PBSA) development. It provides guidance for developers and planning officers in the assessment of planning applications. The current draft was approved by Planning Committee on 10 September 2025, following public consultation from 28 February to 23 May 2025. The guidance also requires a walkability ratio for proposals for student accommodation. This follows the same requirements as the Edinburgh Design Guidance, but without the requirement of the inclusion of a primary school, equipped play area or community facilities in the calculation of the walkability ratio.

Local Living Framework

This topic paper considers the following evidence available for the Council area for each of the five categories of the Local Living Framework within Local Living and 20 Minute Neighbourhoods. As the categories in local living are cross-cutting, where content is covered in another topic paper this is signposted.

Movement

The City Mobility Plan sets out the Council's strategic approach to the sustainable, safe and effective movement of people and goods around Edinburgh. The most recent Plan was approved by Transport and Environment Committee in February 2024.

Policy Measure Place 2 in the City Mobility Plan is to ‘support the 20-minute neighbourhood concept to underpin local communities and reduce the need for longer distance journeys.’ The strategy is recognised as having the potential to underpin sustainable infrastructure design and implementation while also working towards poverty prevention and improving health and wellbeing. The strategy defines the 20-minute neighbourhood concept as creating places where people’s daily needs can be met within a 10-minute walk/wheel of their house. The plan supports the use of the Place Standard to engage further on the implementation of local living through 20-minute neighbourhoods.

Measures to support local living include the following:

- Investment in sustainable travel modes
- Creation of pedestrian-friendly public spaces
- Support the creation of dense mixed-use developments.

The City Mobility Plan also emphasises the importance of equal access to the city and connecting communities to wider opportunities outside their immediate neighbourhood which links to Topic 17 Community wealth building. Further evidence regarding transport infrastructure, including active travel and public transport infrastructure, is included in Topic 01a Infrastructure - Transport.

Space

Open Space 2021 Edinburgh’s Open Space Strategy (OSS) was approved in 2016. It sets out the Council’s open space standards for local access to green space and play areas. The OSS is currently being reviewed and updated. The current OSS states that all homes should be within 800m walking distance of an accessible large greenspace of at least 2 hectares and 400m walking distance of a ‘good’ quality, accessible greenspace of at least 500 sqm. All homes should also have access to at least one of the following:

- A play space of good play value (51-70) within 800 metres walking distance
- A play space of very good play value (71-100) within 1200 metres walking distance
- A play space of excellent play value (101+) within 2000 metres direct distance.

The OSS maps and grades the open spaces and play spaces across the city. It also maps the multi-pitch venues, golf courses and allotments.

The Council’s Play Sufficiency Assessment, completed in 2026, forms part of the evidence base for the Evidence Report and will inform the preparation of the Proposed Plan. The Play Sufficiency Assessment considers the quality, quantity and accessibility of both formal and informal play spaces across the authority and at locality level, supported by mapping of all formal areas of play.

The quality of formal play spaces (e.g. playgrounds) is assessed through on-site audits using the Play Value methodology. Play Value evaluates the overall experience of play within a space, including:

- Equipment and range of play opportunities
- Opportunities for cooperation, learning and social interaction
- Site features, design, layout and safety.

Accessibility is assessed against the Council's Open Space Strategy standards, which set out distance thresholds for access to play spaces of different quality. The quantity and spatial distribution of play spaces are analysed using GIS and existing Council databases.

The Physical Activity and Sport Strategy for Edinburgh 2024 to 2034 sets out how the Council will work together with key partners, the sector and local communities to increase the number of people who participate in physical activity and sport. It was approved by Culture and Communities Committee on 5 December 2024.

The study highlights the importance of localised community organisations that support sport and physical activity and the provision of localised solutions in partnership with trusted people and organisations. The strategy also identifies the possibility for local streets, parks and public spaces to support every day and informal outdoor activity and plan for all ages.

Growing Locally - Edinburgh's Food Growing Strategy 2021 - 2026 is the Council's food growing strategy. It was approved by Policy and Sustainability Committee on 20 April 2021. The strategy emphasises the opportunities of local food growing on wellbeing, placemaking, the local economy and the city's climate impact. The strategy identifies the need to create a more localised and circular food economy and to support and encourage local buying and selling. The allotments and community gardens throughout the city are mapped.

This topic is covered further in the Place Profiles and Topic 06 Green blue infrastructure, open space and recreation.

Resources

The Edinburgh 2030 Climate Strategy sets out the vision for a net-zero, climate resilient Edinburgh. It was approved by Policy and Sustainability Committee on 30 November 2021. The vision in the strategy includes creating a city where 'people live in neighbourhoods with easy access to greenspaces and local services reducing the need to travel' and supporting a new approach to urban living that enables sustainable travel by providing higher density mixed-use development, in sustainable locations, with easy access to jobs and services. As well as reducing travel emissions, this will create markets for new local businesses, create local jobs and strong local economies that build community wealth. 20-minute neighbourhoods are also identified as a core principle for providing a just transition.

The Edinburgh Economic Strategy sets out the priorities and actions for the Council and partners to help deliver our aim to enable good growth for the Edinburgh economy. It was approved by Policy and Sustainability Committee on 30 November 2021. Delivering a 20-minute neighbourhood strategy is included as one of the actions to deliver a fairer Edinburgh economy. The strategy emphasises the ability of a local living strategy to support local economies and businesses to provide the daily needs of their communities and create local jobs. This topic is covered further in Topic 17 Community wealth building, Topic 18 Economy, business and industry and Topic 19 City, town, local and commercial centres.

In June 2018, the Council launched a new independent Edinburgh Poverty Commission. The commission published the report A Just Capital: Actions to End Poverty in Edinburgh in September 2020. In response to these recommendations, the Council prepared the End Poverty in Edinburgh Delivery Plan 2030, which was approved by Policy and Sustainable Committee on 01 December 2020. The implementation of 20-minute neighbourhoods at the heart of designing neighbourhoods in Edinburgh was included as a key aspect to ensure people feel connected to the city and have access to local, safe, welcoming community spaces 'where they can connect with others, access the right support for them and make progress at the right pace'. The importance of having shops, quality outdoor and green spaces and support services within walking distance of someone's home was also highlighted as important.

The Improvement Service published Integrating land use planning and child poverty in March 2026, with input from the Heads of Planning Scotland, the Child Poverty Peer Support Network and various local authorities. This publication highlights that supporting local living addresses child poverty by improving local accessibility for low-income families to employment, further education, training and community services. It emphasises that providing safe, local access to schools, shops, healthcare services, family support hubs and play areas reduces the need for costly car travel.

The Edinburgh Partnership is a community planning partnership that brings together public agencies, third and private sector organisations and local community representatives. In February 2022, the partnership published a Local Outcome Improvement Plan (LOIP) which is the Edinburgh Partnership Community Plan 2022-2028. It has three priority workstreams with actions to ensure residents across Edinburgh have:

- Enough money to live on
- Access to work, learning and training opportunities
- A good place to live.

The plan emphasises the importance of the design principles behind 20-minute neighbourhoods to increase inclusion and connectedness. The plan emphasises the importance of 20-minute neighbourhoods incorporating community wealth building

capacity, as local economic opportunities are essential for vibrant neighbourhoods. This topic is covered further in Topic 17 – Community wealth building.

NHS Lothian released a new Public Health and Health Policy strategy in August 2024 that placed a strengthened emphasis on the importance of a prevention approach for the Lothian health and care system. This included acknowledging 'the importance of healthy places and connected communities in improving population health and reducing health inequalities.' The paper acknowledged the importance of active travel and ensuring that services are designed to be located close to where people live. This topic is covered further in Topic 01c Infrastructure – health and social care including access to health and social care infrastructure needs, and Topic 16 Health and wellbeing.

The Council approved a new Corporate Property Strategy at Policy and Sustainability Committee on 22 August 2023. It has 'Live Well Locally' as one of the core strategic themes for managing the Council's non-housing property assets, including education, leisure, cultural, community and care facilities. This includes supporting people to access the services they need locally by providing multiple services and facilities from a single location. The strategy also aims to improve sustainable and active travel access to services and facilities, deliver mixed-use regeneration and development and support local economies and businesses. This topic is covered further in Topic 1b Infrastructure – education.

A variety of housing types, sizes and tenures can make sure people stay within their local area as circumstances change throughout their lives. Topic 13 Specialist and other accommodation covers this issue.

The Local Living mapping plots all the community spaces which can support a range of activities that help support opportunities for social interaction, reduce loneliness and foster community cohesion.

Civic

The historic environment can help create a sense of identity and belonging which supports living well locally. This is covered in Topic 10 Historic assets and places.

The Council's Citywide Cultural Strategy 2023-30 was approved by Culture and Communities Committee on 13 December 2022. Aim 1 of the strategy is to have Edinburgh be a city where 'all Edinburgh residents can easily access cultural experiences that they find meaningful in their local area, and everyone has the opportunity to contribute to shaping local cultural provision'. This aim can be seen as aligning with the principles of local living and requires the provision of local cultural venues and services. This topic is covered further in Topic 20 – Tourism, culture and creativity. This sets out the local community facilities such as libraries and community centres which can support culture and creativity within a local area.

In 2020, the Council established the Equally Safe Edinburgh Committee. This is a partnership between City of Edinburgh Council, NHS Lothian, Police Scotland and

the voluntary sector and partner agencies. It works to put into practice the Scottish Government and COSLA's Equally Safe Strategy across Edinburgh. This work included consulting on views around women's safety in public places. It recognises that perceptions of safety prevent people from feeling able to access local services and facilities, and that this has a particularly high impact on women and girls. Between June and September 2022, the committee carried out engagement work on Women's Safety in Public Places. This consultation highlighted the importance of well-lit public spaces, a sense of neighbourliness/ community and good levels of street activity and observation. This work led to the creation of Edinburgh Street Design Guide: Detailed Design Manual Factsheet P09 – Women's Safety. This factsheet sets out a series of principles to follow to enhance the perception of safety for women and girls in the design of public realm. City of Edinburgh Council also established a Feminist City Short Life Cross-Party Working Group to ensure gender equity is central to land use planning and the management and design of public spaces. The most recent report on this was presented to Planning Committee on 28 January 2026. It considers the steps taken to ensure that women's safety is a key consideration for this.

Stewardship

Edinburgh has provision for 47 Community Council areas as set out in the Scheme for Community Councils. Community Councils are run by local residents who represent local communities to the City of Edinburgh Council and promote the individual identities of their community, in line with the Local Government (Scotland) Act 1973.

Within Edinburgh, there are also many community bodies such as development trusts, friends groups, street organisations and voluntary groups who are also actively engaged and participating in their local area. There are also a number of community asset transfers which is covered in Topic 17 – Community wealth building.

Local Place Plans are a new type of plan introduced by the Planning (Scotland) Act 2019. Planning circular 1/2022: Local Place Plans provides guidance to communities and planning authorities on the preparation, submission and registration of Local Place Plans. Local Place Plans allow community bodies to set out their own proposals for the development or use of land within their area and will inform the development of a place-based approach. They effectively empower communities to play a proactive role in the defining the future of their place as Local Place Plans must be taken into account in the preparation of the plan. The Council has a register of Local Place Plans.

Place-Based Approach

It is important that the plan is place-based. Edinburgh is not just one place but a collection of different places: each with its own challenges, needs and aspirations.

For the plan, it is important that these are fully understood to achieve better outcomes for places, people and communities on a local level.

Place Profiles

Place Profiles have been prepared for each of the 17 wards within the Council area to provide that level of understanding. They provide detailed evidence and assessment on the extent to which the different parts of the city enable people to live well locally and what improvements are needed. The Place Profiles include an assessment of local centres, existing settlement patterns and the characteristics and challenges faced by different places with respect to local living. The Place Profiles have been prepared using a combination of desktop analysis and the results of place-based engagement with a range of local people.

The 'What makes a good place?' engagement was structured around the Place Standard themes. It asked local people about what they liked about where they lived, what they didn't like and what would make it better. The consultation included an online survey and in-person drop-in events at various locations around Edinburgh. The survey also asked people what they thought about the different services and facilities in their area and what was important to have within walking distance.

There was also a separate questionnaire for children and young person on place and play. This also covered topics like homes, shops and services, moving around, public transport, community space and places to play and hang out.

Overall, the Place Profiles provide a baseline understanding of how local living is working throughout the city and within each individual wards. They will form the basis for place-based planning within the Proposed Plan and how 'gaps' in living well locally could be delivered.

Summary of stakeholder engagement

Key Agency	**SEStran**
Main views raised	• **Draft Topic Papers (Nov 2025):** Recognition of transport as a key enabler for higher quality local living is positive. Suggested that including more examples of the benefits of enabling active travel within the local community might be useful. • **Final Topic Papers (March 2026):** Final papers reviewed. Content with the changes made.
Council response and implications for the proposed plan	This was reviewed but concluded that there are already sufficient examples of the benefits included within the Evidence Report, including the Edinburgh case study examples contained within the Scottish Government

	Planning Guidance on Local Living and 20 Minute Neighbourhoods.
Is the agency content with the evidence?	SEStran do not dispute any of the evidence set out in the topic paper.
Areas of agreement	Connected transport is a key enabler for higher quality local living. Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with SEStran will take place in developing the Proposed Plan.

Key Agency	**NHS Lothian**
Main views raised	• **Draft Topic Papers (Nov 2025):** Welcomes the inclusion in the evidence base. Strongly aligned with NHS Lothian's priorities around prevention, healthy environments and equitable access to everyday and essential services. The evidence report provides a robust framing of the principles of Local Living. There should be stronger links to health inequalities and appropriate consideration to accessing opportunities outside immediate neighbourhoods. • **Final Topic Papers (March 2026):** Content with incorporation of comments and Topic 16 Health and wellbeing explores health inequalities in more detail. In general agreement that there is sufficient evidence.
Council response and implications for the proposed plan	The topic paper was amended to make these links clearer.
Is the agency content with the evidence?	NHS Lothian does not dispute any of the evidence set out in the topic paper. They have advised: 'With regards the Evidence Report, NHS Lothian Population Public Health Team are pleased to see the extent to which our comments and suggestions have been considered and incorporated. We are in general agreement that there is sufficient evidence provided across the topic papers to effectively support the development of the Local Development Plan.'

Areas of agreement	• The capacity of Local Living principles to improve health, reduce inequalities and enable climate-resilient communities. • The alignment of Local Living with the Place Principle, the Population Health Framework and NHS Lothian's priorities around prevention, healthy environments and equitable access to everyday services. • The need for a network of connected neighbourhoods. • The importance of emphasising walking, wheeling and cycling, including active travel routes, traffic calming measures and pedestrian infrastructure. Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	It is anticipated that ongoing engagement with NHS Lothian will take place in developing the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Scoping (May 2025):** The Scottish Government Planning Guidance on Local Living and 20-minute Neighbourhoods should form part of the evidence base. • **Draft Topic Papers (Nov 2025):** No further comments given. • **Final Topic Papers (March 2026):** Scotland's Census 2022 should be included in the evidence base. A flexible approach to 20-minute neighbourhoods should be taken, considering local context. Larger housing developments may be able to create 20-minute neighbourhoods through the incorporation of additional facilities. The 20-minute round trip should include other travel modes. The walkability ratio in the Edinburgh Design Guidance includes reference to a 400m or 800m distance, which should be avoided as this is not mentioned in NPF4 or Scottish Government's Local Living and 20-minute Neighbourhood guidance. Agree with allocating sites well served by services and amenities, but this should not be at the expense of placemaking or viability. The Council should continue to engage with stakeholders at all stages.
Council response and implications	The Scottish Government Planning Guidance on Local Living and 20-minute Neighbourhoods is included in the evidence base.

for the proposed plan	Scotland's Census 2022 is included in the wider evidence base, including in the Place Profiles, which will provide a baseline understanding of how local living is working throughout the city. On flexible approach, the walkability ratio is included in the Edinburgh Design Guidance. This guidance was approved by Planning Committee on 10 September 2025. This guidance document is a relevant part of the wider evidence base and will be considered alongside other sources of evidence.
Is the agency content with the evidence?	Homes for Scotland suggests that it would be more consistent for the walkability ratio within the Edinburgh Design Guidance to not refer to a 400m or 800m distance. No other evidence is disputed within the topic paper.
Areas of agreement	• A flexible approach should be taken in the application of Local Living frameworks, with consideration of local context. • Larger housing developments may be able to create 20-minute neighbourhoods through the incorporation of additional facilities. • The Local Living framework should include consideration of walking, wheeling, cycling and public transport. • The allocation of sites within areas well served by services and amenities, while also considering placemaking principles and viability factors. • A balanced approach to allocating sites is required. Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The deliverability of sites allocated for housing and associated local living policies will be considered at Proposed Plan stage.

Other engagement and matters raised

The University of Edinburgh - Support the 20-minute neighbourhood approach and that ongoing engagement should encourage a strategic network of amenity to support this.

Place Engagement: Results have fed into the Place Profiles and give an overview of what people, including children and young people, think about where they live and how well it is working.

Other: Internal discussions took place with the Council's Strategic Asset Planning team, who developed the Edinburgh 20-Minute Neighbourhood Strategy. It is content with the Evidence Report. There were also discussions with the LOIP 3 group set up to deliver actions on the 'good place to live' priority workstream and also with NHS Lothian Public Health on health inequalities.

Summary of implications for the Proposed Plan

In preparing the Proposed Plan, local living will be a key theme and consideration in the preparation of the spatial strategy, proposals and policy and the implications are as follows:

- Local living evidence will be assessed along with other linked topic evidence and the Place Profile information
- Assessment and analysis of different wards to understand how well local living is being achieved and what might be missing or what barriers might exist to prevent people, particularly groups at a higher risk of exclusion, accessing their daily needs within the local area
- Assess how the allocation of sites for development and the redevelopment of existing sites work to deliver and support local living including the development of place-based policies, place briefs and masterplans
- Consider the appropriate densities and mix of uses required to support the delivery of mixed-use neighbourhoods that enable local living
- Where there are identified gaps in local living provision, consider how future development could help deliver shops and other services.

Statements of agreement / dispute

SEStran agree that connected transport is a key enabler for higher quality local living.

NHS Lothian welcomes the inclusion of Local Living in the evidence base. The topic is strongly aligned with Scotland's Place Principle, Population Health Framework and NHS Lothian's priorities around prevention, healthy environments and equitable access to everyday and essential services. There are clear connections to increasing physical activity, reducing car dependency, enhancing mental wellbeing, and supporting social cohesion. The recognition of complementary local strategies is welcomed, as it the recognition of spatial variation across Edinburgh and the need for a network of connected neighbourhoods. The evidence report provides a robust framing of the principles of Local Living as well as key strategies to support this alongside a good range of underpinning evidence

Homes for Scotland agree that the 20-minute neighbourhood principle must consider local context and wider social, economic and environmental benefits. Larger housing developments may be able to create 20-minute neighbourhoods through the incorporation of additional facilities, such as retail, bike parking and public transport hubs. The Local Living framework should include consideration of walking, wheeling, cycling and public transport. Homes for Scotland also do not disagree with the notion of allocating sites within areas well served by services and amenities. This should not be at the expense of placemaking principles, nor viability factors.

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

16: Health and wellbeing

Topic	**16: Health and wellbeing**
Description of topic	An assessment of the health and wellbeing information for Edinburgh, identifying key health inequalities and where they are located including where there are gaps in health services. Summary of the place-based assessments to determine how places in Edinburgh are served by environmental factors and physical amenities influencing health and wellbeing.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5) - set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used.
Relevant NPF4 Policies	• Policy 13 Sustainable transport • Policy 14 Design, quality and place • Policy 15 Local living and 20 minute neighbourhoods • Policy 20 Blue and green infrastructure • Policy 21 Play, recreation and sport • Policy 23 Health and safety
Local Development Plan Guidance	• Health and Safety (page 76) sets out that the Evidence Report is likely to include information on health inequalities, particularly in places experiencing the most disadvantage, awareness of locations of concern for suicide and health and social care infrastructure and services needed in the area, including both services provided in the community directly by Health Boards, and services provided on their behalf by contractors such as GPs, dentists and pharmacists. • Environmental factors and physical amenities which influence health and wellbeing can include: the nature and distribution of poor air quality, (including but not limited to Air Quality Management Areas); noise (including quiet areas and noise action plan areas); odour; lighting; and green and blue infrastructure. Food environment evidence may include: food availability and food deserts; food outlet clusters; local and community food growing; food markets; market gardens; and non-agricultural commercial food growing.
Linked Topic Papers	• Topic 01a Infrastructure – transport • Topic 01c Infrastructure – health and social care • Topic 06 Blue green infrastructure, open space and recreation • Topic 11 Design, quality and placemaking • Topic 15 Local living

	• Topic 17 Community wealth building • Topic 19 City, town, local and commercial centres • Place Profiles
List of and links to evidence	• **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023 • **CD143** Fairer Scotland Duty: guidance for public bodies, Scottish Government, August 2022 • **CD199** Scotland's Population Health Framework 2025 – 2035, Scottish Government, June 2025 • **CD220** Social Capital and Community Wellbeing in Scotland Report 2024, Scottish Government, October 2024 • **CD167** National Good Food Nation Plan, Scottish Government, January 2024 • **CD594** A systems-based approach to physical activity in Scotland, Public Health Scotland, November 2022 • **CD205** Scottish Government Planning Guidance: Local living and 20 minute neighbourhoods, Scottish Government, April 2024 • **CD525** Integrating land use planning and child poverty, Improvement Service, March 2024 • **CD600** Place and wellbeing: integrating land use planning and public health in Scotland, Public Health Scotland, March 2024 • **CD523** Briefing Place and Wellbeing Outcomes, Improvement Service, October 2024 • **CD599** National guidance on action to address suicides at locations of concern, Public Health Scotland, December 2025 • **CD597** Forecasting the future burden of disease: Incorporating the impact of demographic transition over the next 20 years, Public Health Scotland, November 2022 • **CD583** NHS Lothian Public Health. A strengthened approach to prevention across the Lothian health and care system, NHS Lothian, August 2024 • **CD646** ScotPHO Profiles, Scottish Public Health Observatory, accessed April 2026 • **CD259** City of Edinburgh Area Profile Dashboard, City of Edinburgh Council, accessed April 2026 • **CD147** Health and Wellbeing Census Scotland 2021-2022, Scottish Government, February 2023 • **CD563** Subnational Population Projections: 2022-based, National Records of Scotland, September 2025 • **CD452** Actions to End Poverty in Edinburgh 2025 Update, Edinburgh Poverty Commission, October 2025 • **CD524** Child Poverty Mapping, Improvement Service, accessed April 2026

- **CD582** Joint Strategic Needs Assessment - Children and Young People in Edinburgh, NHS Lothian, June 2025
- **CD339** Physical Activity and Sport Strategy for Edinburgh 2024 to 2034, City of Edinburgh Council, December 2024
- **CD477** Priority Places for Food Index, Healthy and Sustainable Places Data Service, accessed September 2025
- **CD313** Growing Locally: Edinburgh's First Food Growing Strategy 2021-2026, City of Edinburgh Council, April 2021
- **CD134** Draft agglomerations noise action plan: consultation, Scottish Government, November 2025
- **CD087** Air Quality Action Plan 2024, City of Edinburgh Council, January 2024
- **CD198** Scotland Noise Maps, Scottish Government, accessed April 2026
- **CD038** Edinburgh Economic Needs Study: Economic Overview, Biggar Economics (City of Edinburgh Council, February 2025

List of matters covered

This topic paper considers the policy context and evidence in relation to health and wellbeing in Edinburgh in order to identify key trends and inequalities to address as part of the Proposed Plan. It includes the following areas:

- National and local policy context and guidance
- Health and wellbeing statistics, indicators and inequalities
- Access to healthy food and clustering of unhealthy uses
- Access to food growing spaces
- Noise
- Air quality
- Proximity to health infrastructure.

Summary of evidence

National

National Planning Framework 4

NPF4's spatial principle of most relevance to health and wellbeing is local living which is to support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.

Policy 23 Health and Safety sets out that local development plans (LDPs) should seek to tackle health inequalities particularly in places which are experiencing the most disadvantage. They should identify the health and social care services and

infrastructure needed in the area, including potential for co-location of complementary services, in partnership with Health Boards and Health and Social Care Partnerships.

LDPs should create healthier places for example through opportunities for exercise, healthier lifestyles, land for community food growing and allotments, and awareness of locations of concern for suicide.

Spatial strategies should maintain appropriate distances between sites with hazardous substances and areas where the public are likely to be present and areas of particular natural sensitivity or interest.

There will need to be consideration of how the Proposed Plan can support improved health and wellbeing outcomes and address health inequalities through a place-based approach. There are strong links to Topic 15 Local living and the Place Profiles which examine the circumstances of a place and what needs to be in place to live well locally.

Topic 01c Infrastructure - health and social care will cover the health infrastructure within the Council area.

Topic 01f Infrastructure – pipelines and hazards will cover potential hazardous infrastructure or sites.

Therefore, this topic paper seeks to gather evidence to ensure that health and wellbeing outcomes are embedded into the Proposed Plan.

Fairer Scotland Duty: guidance for public bodies (published August 2022)

This statutory guidance for public sector bodies subject to the Fairer Scotland Duty, which includes the City of Edinburgh Council, sets out how they should actively consider how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions.

It reinforces the need to have due regard for reduction of inequalities of outcome and that public sector bodies can be held to account under this duty.

Preparation of a local development plan is listed as an example of a strategic decision which this duty would apply to and guides bodies to ensure their actions will reduce inequalities. It is noted that the steps set out in the guidance are intended to be similar to those used by many public bodies for equality impact assessment (EQIA) and that there is scope to include this as part of a future wider Integrated Impact Assessment (IIA).

The Council will undertake an IIA as part of preparation of the Plan and will include an evaluation of how inequalities caused by socio-economic disadvantage can be reduced as part of this process.

Scotland's Population Health Framework 2025 – 2035

The Population Health Framework sets out the Scottish Government's and the Convention of Local Authorities in Scotland (COSLA)'s long-term collective approach to improving Scotland's health and reducing health inequalities for the next decade.

One of the key relevant actions from this framework is to embed health and wellbeing considerations into the development and delivery of local development plans.

This will include:

- Supporting better collaborative working between Health Boards and planning authorities through Heads of Planning Scotland and the Improvement Service
- Sharing contacts within Health Boards for planning authorities to engage with and to enable Health Boards to meet their legal duty to co-operate in the preparation of LDPs
- Ensuring meaningful engagement and input from Health Boards and Health and Social Care Partnerships in LDPs specifically providing input to Evidence Reports, Proposed Plans and Delivery Programmes regarding the provision and delivery of health and care services or facilities
- Completing of integrated/health impact assessments and strategic environment assessments
- Continuing to promote and support the use of the Place Standard Tool
- Applying the health and planning resources on OurPlace.scot

It is important that there is continued collaboration with NHS Lothian Public Health and the Edinburgh Health and Social Care Partnership throughout the Proposed Plan process.

Topic 01c Infrastructure - health and social care is informed by the Edinburgh Health and Social Care Partnership report regarding the provision and delivery of health and care services or facilities.

Where community bodies are creating Local Place Plans, the Council is encouraging the use of the Place Standard tool and OurPlace resources for their own engagement.

Scottish Government Social Capital and Community Wellbeing Report 2024 (published October 2024)

This report provides information about the extent and nature of social connections and social capital in Scotland. It draws on a range of data – from both the Scottish Household Survey and qualitative research - to explore social capital in Scotland. The focus of the report is on the time from 2018/2019 to 2022. This is the period of the COVID-19 pandemic and cost of living crisis, and the report considers the possible effects of these on social capital.

It considers the quality of people's social networks, how people feel about their neighbours and neighbourhoods, the control and influence people feel they have over their circumstances, and levels of social participation.

It also sets out how social connections are a central part of people's lives and wellbeing.

There are a number of key points in this analysis which are relevant to Edinburgh:

- Neighbourhoods are rated well across a range of dimensions in Scotland including neighbourhood quality, and perceived neighbourhood help, kindness, and trust. This includes Edinburgh.
- There are some aspects of community life that are not as strong, and this has important consequences. Neighbourhood empowerment is low, many people experience loneliness and volunteering has been decreasing.
- There are inequalities in measures of social capital. National-level measures can disguise (sometimes large) inequalities across different geographical locations, demographics, and other subgroups of the population. People in rural areas tend to have more positive experiences of social capital than those in large urban or other urban settings.
- Social capital measures are lower than they were in 2013.
- There are signs of improvement in neighbourhood connections since the COVID pandemic. Trust in the neighbourhood and perceptions of kindness also rose. The proportion of people who feel they can turn to their neighbours for advice increased. There have also been improvements in agreement that local people take action to improve their neighbourhoods.

The Place Profiles identify the social connections opportunities within different places by identifying where there is community space and facilities that help to bring people together and where there are possible gaps. The Proposed Plan should explore how policies and spatial strategy could improve community facilities that promote social connections as a key part of wellbeing and to reduce inconsistency between different areas of the city.

The 'what makes a good place' engagement with the general public as part of the Evidence Report preparation identified that people valued community space as a place – often free- where activities can happen and people can meet up and was particularly important for older people. The separate 'place and play' engagement with children and young people also identified the importance of community space to hold clubs and activities with many responses suggesting there should be more.

National Good Food Nation Plan 2024

The National Good Food Nation Plan sets out the national outcomes for access to healthy and nutritious food, and how these are to be assessed and measured.

- Outcome 1: Everyone in Scotland eats well with reliable access to safe, nutritious, affordable, sustainable, and age and culturally appropriate food.
- Outcome 2: Scotland's food system is sustainable and contributes to a flourishing natural environment. It supports our net zero ambitions and plays an important role in maintaining and improving animal welfare and in restoring and regenerating biodiversity.
- Outcome 3: Scotland's food system encourages a physically and mentally healthy population, leading to a reduction in diet-related conditions.
- Outcome 4: Our food and drink sector is prosperous, diverse, innovative, and vital to national and local economic and social wellbeing. It is key to making Scotland food secure and food resilient and creates and sustains jobs and businesses underpinned by fair work standards.
- Outcome 5: Scotland has a thriving food culture with a population who are interested in and educated about good and sustainable food.
- Outcome 6: Scotland has a global reputation for high-quality food that we want to continue to grow. Decisions we make in Scotland contribute positively to local and global food systems transformation. We share and learn from best practice internationally.

It describes the implications for local development plans in taking a living well locally approach to promoting healthy nutritious food outlets in areas where there are gaps in access to this and resisting outlets which may undermine access. It also reinforces the importance of promoting opportunities for food growing which supports a physically and mentally healthy population.

A systems-based approach to physical activity in Scotland (published November 2022, Public Health Scotland)

This report provides a pragmatic systems-based approach to physical activity that can be applied strategically at a national and local level. Systems-based approaches are increasingly being used when responding to complex public health issues such as reducing inactivity and increasing population levels of physical activity.

This report describes the approach and process used to derive a series of evidence based actions, reframed as strategic delivery outcomes, that can be applied nationally and/or locally to inform future planning and implementation of system-wide approaches to physical activity in Scotland.

Actions of particular relevance to this topic in a planning context are:

- Active travel - Active travel behaviour encouraged and infrastructure for walking, wheeling and cycling prioritised across Scotland
- Active places and spaces - Places and spaces across Scotland are appropriately designed, created and maintained to enable people to be physically active in their community

- Sport and active recreation for all - active participation in sport and active recreation increased across the life course through equitable and inclusive access to appropriate places, spaces and services.

This national policy approach has informed other Council strategy as noted below and can be used to guide decision-making. These relevant actions are included as part of other topic areas and the Place Profiles.

Local living and 20 minute neighbourhoods: planning guidance 2024

This guidance supports the application of Policy 15 Local living and 20 minute neighbourhoods as set out in NPF4. It is intended to guide the application of the above policy in development planning and planning decisions.

It sets out how places with high quality housing, supportive local infrastructure, services, employment, education, and sustainable travel options, can help to break cycles of disadvantage and poverty, promote healthy lifestyles, and support physical, social, and mental health and wellbeing. They can also help support thriving local economies and community wealth building.

The key elements of local living have been mapped as part of the Place Profiles which form part of the Evidence Report. This local living mapping assesses whether there is access to services and facilities needed to live well locally and helps to identify gaps. The Proposed Plan will explore how the spatial strategy, policies and place-based polices can help to improve provision in a local area.

Place and wellbeing: Integrating land use planning and child poverty (Published March 2026, Improvement Service)

This briefing has been published by the Improvement Service Place as practical guidance for both planning and public health and explores the interconnected systems shaping both child poverty reduction and place planning in Scotland. Its purpose is to foster mutual understanding and spark discussion on how professionals in these fields can collaborate to deliver transformative change for low-income families and accelerate progress towards eradicating child poverty.

It sets out that the NPF4 policies contribute to achieving National Outcomes, including reducing child poverty, which relate strongly to improving wellbeing. LDPs can contribute to tackling child poverty by the following actions:

- Planning can improve employment accessibility by shaping places that affordably connect people with local opportunities and reduce barriers to work, further education and training.
- Planning can reduce everyday living costs by improving access to affordable housing, services, and infrastructure.
- While planning has less direct influence on social security, it can enable access to the services families need to claim and sustain support.

The Proposed Plan will explore how policies and spatial strategy can contribute to these actions to reduce child poverty and therefore improve wellbeing.

Place and wellbeing: integrating land use planning and public health in Scotland (Published April 2024, Improvement Service)

This briefing has been published by the Improvement Service Place and Wellbeing Collaborative as practical guidance for both land use planning and public health practitioners and policy-makers, to help them take health and wellbeing considerations into account when considering the development planning process (the production of local development plans) and the development management process (making decisions on planning applications).

It sets out a number of ways to integrate public health and planning and at what stages this is most appropriate. It also includes examples of the health evidence which will support the development of planning policies that will maximise health benefits for the population as follows:

- Local health and wellbeing needs
    - Inequalities in health and gaps in life expectancy
    - Health conditions
    - Causes and burdens of ill health
    - Trends such as obesity, physical inactivity, alcohol use and mental wellbeing
    - Health challenges across equality groups
- Place-based information
    - Scottish Indices of Multiple Deprivation (SIMD)
    - Accessibility and proximity to existing community services
    - Safety and crime (including road safety)
    - Locations and quality of green and open spaces
    - Air quality, noise and water pollution, and other environmental health risks
    - Flood risk areas
    - Minerals and waste
- Access to/demand for health facilities
    - Locations, accessibility and proximity to existing health facilities
    - Quality, capacity and condition of existing health facilities

This has informed the health evidence gathered for the Evidence Report, much of which relates to other topic areas. NHS Lothian Public Health has provided data for use at the Evidence Report stage primarily within the Place Profiles including the local living mapping for each of Edinburgh's wards.

It has also informed health and wellbeing indicators and relevant information taken from NHS, ScotPHO and Census data detailed in the relevant sections below. The information on the quality, capacity and condition of existing health facilities is

covered in Topic 01c – Infrastructure - health and social care following engagement with the Edinburgh Health and Social Care Partnership.

The Proposed Plan will be prepared taking account of the health-related data noted above and included within topic papers and Place Profiles with continued engagement with NHS Lothian, Public Health Scotland and the Edinburgh Health and Social Care Partnership.

Place and Wellbeing Outcome Briefing 2024

The Place and Wellbeing Outcomes seek to provide a consistent and comprehensive focus for where place impacts on the wellbeing of people and planet.

The outcomes aim to support all sectors to focus decision-making and implementation on a common set of evidenced features that will enable each place to have a positive impact on the wellbeing of people and planet while reducing inequality.

They are a list of outcomes that 'every place needs to enable those who live, work, and relax there to stay healthy and thrive.' They highlight that 'to help in reducing Scotland's significant inequalities, every sector needs to be working together to take actions that deliver all the outcomes in every place.' Its states the incorporation of these outcomes throughout the National Planning Framework 4 has ensured their consistent use across Scotland.

In Edinburgh, these outcomes have been used to inform the Place Profiles and the local living mapping in order to align our spatial evidence with this consistent picture of what is needed to support health and wellbeing. The Place Profiles will help to identify where there are strengths, weaknesses and gaps in those elements that are needed to support health and wellbeing, recognising that they are not consistent across the city.

The connections between the Place and Wellbeing Outcomes and the Evidence Report including sections of the Place Profiles are detailed as below:

Place and Wellbeing Outcomes	Evidence Report	Place Profile Section
Movement (Active Travel, Public Transport, Traffic and Parking)	**01a** Infrastructure - transport **15.** Local Living	**Transport:** Demographic information, mapping of public transport accessibility, stops, current and proposed active travel network)
Spaces (Streets and Spaces, Natural Spaces, Play and Recreation)	**06** Green blue infrastructure and recreation **15** Local living	**Environment:** Mapping of access to blue green network, growing spaces,

		tree canopy, open space and play sufficiency
Resources (Services and Support, Work and Economy, Housing and Economy)	**01b** Infrastructure - education **01c** Infrastructure -health and social care **15** Local living	**Place:** Housing allocations and pipeline **Health:** Demographic information, mapping of services **Economy:** Demographics, mapping of key employers, centres and employment land designations **Housing:** Demographics and mapping of housing types, tenures, density and overcrowding
Civic (Identity and Belonging, Feeling Safe)		**Culture and Community:** Provision of venues and spaces to support culture/ community activities
Stewardship (Care and Maintenance, Influence and Control)	**17** Community wealth building	**Culture and Community:** community asset transfers

National guidance on action to address suicides at locations of concern (published November 2022, Public Health Scotland)

This guidance has been produced to aid agencies in addressing locations of concern for suicide. This stresses communication with multi-agency groups during short, medium or long-term planning.

Through collaboration with NHS Lothian, contact has been made with the Locations of Concern East Group to assist with identifying locations of concern. For the Proposed Plan, the issues with such locations can be considered in relation to future place-based policies.

Forecasting the future burden of disease: Incorporating the impact of demographic transition over the next 20 years (published November 2022, Scottish Public Health Observatory)

The Scottish Burden of Disease study has been developed to explore future population health trends and scenarios. This allows anticipation of the potential scale of future challenges for public health and the health and social care system in Scotland.

The study shows that despite a projected decrease in the Scottish population; the annual disease burden is forecast to increase 21% in the next 20 years. This means that to retain the 2019 levels of disease burden, the 2043 forecast would need to reduce by 17%, which is similar to averting the entire burden of cancer in 2019.

The largest areas of absolute disease burden are forecast to be in those aged 65 years and above, particularly within those aged 65 to 84 years. The impact of COVID-19 and the cost-of-living crisis on those experiencing multiple deprivation are noted as being likely to result in major health inequalities.

The report also stresses the importance of preventative activity to reduce the likelihood of these forecasts becoming a reality. This is developed further in the local context below.

Local Context

A strengthened approach to prevention across the Lothian health and care system (published August 2024, NHS Lothian Public Health)

The purpose of this paper is to set out a strengthened approach to prevention across the Lothian health and care system, including the City of Edinburgh Council area. It sets out the recommendations which embed prevention across a number of areas which are set out as social determinants of health:

- access to money and resources
- access to and maintenance of employment
- housing
- transport
- neighbourhood and surroundings
- family, friends and community.

Through development of the other topic papers and the Place Profiles, there will be an assessment of these social determinants of health on a place by place basis. This will help to identify strengths, weaknesses and areas of improvement which could be explored by the Proposed Plan process.

This evidence also notes that climate change itself is a threat to health and an important part of a preventative approach is in emission reductions and climate adaptation.

It also presents a broad demographic analysis concluding that higher deprivation and older age is a major driver of poor health and disease. This initial overview is developed further in the demographic information below.

Health and wellbeing statistics, indicators and inequalities

Scottish Public Health Observatory

The ScotPHO Profiles present a range of indicators to give an overview of health and its wider determinants at a local level. Its Population Health and Wellbeing indicators are used here, including some environmental indicators such as active travel and open space use, which are known to have a positive effect of health and wellbeing.

The following data from ScotPHO has been used to build a picture of the baseline population health across Edinburgh, how this has been changing, and for some categories where key inequalities lie.

Life Expectancy

The life expectancy for Edinburgh is 77.8 years for males and 82 years for females, this compares with 76.8 years for males and 80.8 years for females across the whole of Scotland in the midpoint of 2022.

This shows a slight increase from the midpoint of 2012, when the life expectancy for Edinburgh was 77.5 years for males and 81.9 years for females, this compares with 76.8 years for males and 80.9 years for females across the whole of Scotland.

A snapshot of health data from 2017 to 2021 allows for an overview of life expectancy shown by SIMD quintile within Edinburgh and shows that those in the most deprived areas have a life expectancy of 71.3 years for males and 76.8 years for females compared to those in the least deprived quintile which have a life expectancy of 83.1 years for males and for 86.2 years females.

This shows that while Edinburgh tends to perform better than other places in Scotland in terms of life expectancy and this is improving, there are still wide disparities between the most and least deprived areas.

Healthy Life Expectancy

Healthy life expectancy is the age that someone can expect to live before suffering poor health or disability.

The healthy life expectancy for Edinburgh is 64.6 years for males and 65.8 years for females, this compares with 59.6 years for males and 60 years for females across the whole of Scotland in the period 2021-23.

This shows a slight increase from the period of 2013-15, when the healthy life expectancy for Edinburgh was 65.3 years for males and 67 years for females, this compares with 61.9 years for males and 63 years for females across the whole of Scotland.

This shows that while progress has been made overall on improvement of healthy life expectancy, for males this progress has stalled.

Active Travel

Active travel uptake is a measurement of health and wellbeing because of the known positive effects of a more active lifestyle.

The percentage of people who use active travel to get to work in Edinburgh sits at 31.8% compared to 15.4% across the whole of Scotland according to 2022/23 data.

This shows a slight increase since 2012/13 when the percentage was 30% compared to 15.5% across the whole of Scotland.

For younger people, the percentage who use active travel to get to school in Edinburgh sits at 67.6% compared to 47.2% across the whole of Scotland according to 2024/25 data.

This shows an increase since 2014/15 when the percentage was 64.4% compared to 51.1% across the whole of Scotland.

This appears to show that active travel to work is not just higher than the Scottish average but is also rising faster than the rest of the country, and active travel to school is also increasing in contrast with the whole of Scotland where on average it is decreasing.

This is influenced by spatial planning, and active travel access and use will be assessed as part of the topic paper on Topic 01a Infrastructure - transport and the Place Profiles.

Adults Regularly Using or Passing Through Open Space

Open space and nature access is a measurement of health and wellbeing because of the known positive effects of being in nature. Increased access to safe, usable green spaces and improved natural environments can act as protective factors, supporting mental health and reducing suicide risk within communities.

The percentage of people in Edinburgh who report regularly using or passing through an open space sits at 52.2% compared to 44% for the whole Scotland in 2023.

In 2013, this was 39.7% for Edinburgh compared to 36.1% for the whole of Scotland.

The trend across the whole country has been an increase in open space use, particularly since 2020 and the COVID-19 pandemic, but the rate of increase in Edinburgh is greater than the rest of Scotland.

This is influenced by spatial planning, and open space quality and access will be assessed as part of Topic 06 Green blue infrastructure, open space and recreation and the Place Profiles.

Alcohol Specific Deaths

The number of people (per 100,000 people) who suffer death due to alcohol is 20.3 for Edinburgh compared to 21.8 for the whole of Scotland in 2019-23.

For the period 2012-16 this number was 17.8 for Edinburgh compared to 19.7 for the whole of Scotland.

A snapshot of health data from 2019 to 2023 allows for an overview of alcoholic specific deaths shown by SIMD quintile within Edinburgh. In the most deprived quintile the number of deaths (per 100,000 people) is 42.2 while in the least deprived the number is 10.3.

While alcohol specific deaths are rising as a whole in Edinburgh and Scotland, a clear inequality can be seen between the most and least deprived population groups demonstrating a clear link between deaths due to alcohol and deprivation.

Economic Inactivity Due to Ill Health

The percentage of working age, economically inactive adults in Edinburgh who are out of work due to ill health sits at 16.9%, compared to 33.7% for the Scottish average in 2024.

In 2014, the percentage in Edinburgh 17.5% compared to 27.3% for the Scottish average.

This shows a broad pattern of divergence from the pattern in the rest of Scotland, where inactivity due to ill health has been increasing in recent years.

Adults Feeling Lonely in the Past Week

The percentage of adults who report feeling lonely in the last week in Edinburgh sits at 28.1%, compared to 23% for the whole of Scotland in 2024.

In 2018 (the earliest available date for this metric) this was 17.9% for Edinburgh, compared to 21.3% for the whole of Scotland in 2018.

This shows that in the last 7 years there has been a growing feeling of loneliness, which has a negative effect of wellbeing. This has been growing at a faster rate in Edinburgh than the whole of Scotland and ties into a greater feeling of social isolation as highlighted by the Scottish Government Social Capital and Community Wellbeing Report.

Prescriptions for Anxiety/depression/psychosis

Another indicator for mental health is the estimated number and percentage of population being prescribed drugs for anxiety, depression or psychosis.

In Edinburgh this was 16.9% of the population compared to 20.9% for Scotland as a whole in 2023/24.

In 2013/14 this was 13.9% in Edinburgh compared to 16.8% for Scotland as whole, indicating that these mental health issues are lower than the rest of the country but increasing at a similar rate.

A snapshot of health data from 2023/24 allows for an overview of the percentage of population being prescribed drugs for anxiety, depression or psychosis shown by

SIMD quintile within Edinburgh. In the most deprived quintile this is 24.2% compared to 14.1% in the least deprived quintile.

Deaths from Suicide

The number of deaths by suicide (per 100,000 people) in Edinburgh is 13.2, compared to 16.8 for the whole of Scotland in the period 2020-24.

For the period 2010-14 this was 21.6 for Edinburgh compared to 18 for the whole of Scotland.

A snapshot of health data from 2019/23 allows for an overview of the number of deaths by suicide (per 100,000 people) shown by SIMD quintile within Edinburgh for those aged 16+. In the most deprived quintile this was 28 while in the least deprived this was 9.7.

Therefore, there is a key inequality in terms of mental health as shown by prescription rates and suicide deaths. There are many causes for this but it is important to assess deprivation as part of our consideration of locations of concern for suicide, as well as planning for positive wellbeing outcomes more broadly.

Summary

Overall, these metrics show that there are a few key health and wellbeing trends in Edinburgh which should be noted and considered as part of the Proposed Plan. These are:

- A positive trend in terms of active travel and open space use indicates greater access to the environment on average which has a positive effect on health and wellbeing.
- Mixed trends can be seen for health, where absence due to ill health has been decreasing, but alcohol deaths are increasing.
- For mental health and wellbeing, the overall trend is less positive with loneliness, prescriptions for mental health and deaths due to suicide increasing.
- For all metrics where data is available by SIMD quintile, a clear distinction can be seen between the most and least deprived areas. While Edinburgh tends to perform better than the Scottish average, this is influenced by the larger areas of affluence which can mask the problems in more deprived communities.

The implication for the Proposed Plan is that while health and wellbeing is a broad subject with many influences and indicators, environmental factors have a major impact. The Place Profiles are a means to assess health and wellbeing on a ward basis, recognising the inequalities that exist within the city. They will help to identify any issues, weaknesses and gaps that could be addressed through the Proposed Plan that are important to help address those trends with particular focus given to areas in a more deprived SIMD quintile.

City of Edinburgh Council Area Profiles

City of Edinburgh Council has prepared area profile dashboards to display key indicators for Edinburgh, as well as statistics for local areas and this includes some health information derived from census data.

The profile for Edinburgh as a whole shows that 83.7% of residents report having good or very good health in 2022, however this is a decrease of 2.5% since the 2011 census.

This profile also confirms that on average general good health status decreases with age, whilst limitations due to disability increases. This indicates that as Edinburgh's population ages, a greater number of people will report poor or bad health and disabilities that will impact on their lives and abilities.

As this information is available at ward level, it has been incorporated into the Place Profiles for a place-based assessment of health inequalities.

The issue of an ageing population is key trend which needs to be addressed in the Proposed Plan and it is covered in different topic papers, notably Topic 13 Specialist and other accommodation and Topic 01c Infrastructure - health and social care. The 'what makes a good place engagement' asked the public what they thought about their homes and what changes they would like to make. The findings show that accessible housing was particularly mentioned.

Health and Wellbeing Census Scotland 2021- 2022 (published February 2023, Scottish Government)

This statistical publication provides information on the first Health and Wellbeing Census 2021/22 undertaken by local authorities between October 2021 and June 2022 directed at schools and school pupils.

Across the reported measures, it identifies that attitudes to school, views on neighbourhood and life at home, physical health, and mental health and wellbeing differ by stage, sex and deprivation. Data is provided at the City of Edinburgh Council level and is broken down by SIMD quintile. The data below is used as an overview for the health and wellbeing of children and young people.

Generally speaking, I feel safe in the area where I live

Overall, the percentage of respondents in Edinburgh feeling safe all the time was 53%. In the most deprived quintile 41.3% felt safe all the time compared to 61.4% in the least deprived quintile.

Do you think that the area in which you live is a good place to live?

Overall, the percentage of respondents who felt their area was a good place to live was 67.3%. In the most deprived quintile 39.1% felt their area was a good place to live compared to 84.3% in the least deprived quintile.

In general, how would you say your health is?

Overall, the percentage of respondents who felt their health was good or excellent was 74.7%. In the most deprived quintile 68.1% felt their area was good or excellent compared to 79.9% in the least deprived quintile.

How often do you usually do any physical activity in your free time (outside school hours) so much that you get out of breath or sweat?

Overall, the percentage of respondents who never did exercise in their free time was 2.8%. In the most deprived quintile 4.9% never did exercise in their free time compared to 1.6% in the least deprived quintile.

Summary

Overall, there are significant differences in indicators of physical and mental health and wellbeing based upon the level of deprivation children and young people experience based upon the above, and these trends extend across many other indicators included in this health and wellbeing census.

The Place Profiles are a means to assess health and wellbeing on a ward basis particularly for children and young people by combining data with the Place and Play engagement that has taken place. The Place Profiles will help to identify any issues, weaknesses and gaps that could be addressed through the Proposed Plan that are important to help address the health and wellbeing of children and young people especially those living in more deprived areas.

Subnational Population Projections: 2022-based (published September 2025, National Records of Scotland)

The National Records of Scotland regularly publish population projections showing how the population of Scotland as well as that of individual council areas is expected to change. The most recent data for Edinburgh shows expected change from 2022 up to 2047.

The population as a whole is expected to grow from 514,570 individuals in 2022 to 585,838 in 2047.

Broken down into age groups, key trends are as follows:

- Children are expected to decrease as a percentage of the population from 14.6% to 12.9% up to 2047, with little change in total numbers from 75,337 to 75,472 up to 2047
- Working age people are expected to change little as a percentage of the population from 70.3% to 71.0% up to 2047, with an increase in total numbers from 361,878 to 415,751 up to 2047
- Pension age people are expected to increase as a percentage of the population from 15.0% to 16.2% up to 2047, with an increase in total numbers from 77,355 to 94,615 up to 2047.

This shows that overall, the population of Edinburgh is expected to grow and age with the biggest percentage increase in the pension age group. As noted previously by NHS Lothian Public Health evidence, prevalence of health issues increases with age, requiring a focus on prevention for future planning.

The projected changing demographics will be a key consideration for the Proposed Plan and has influenced the evidence gathered and links to other topic papers to ensure that these changes are considered and will be taken account when exploring the spatial strategy, policies and place-based policies.

Child Poverty Percentage Mapping (data published annually up to 2023/24, Improvement Service)

The mapping is produced using National Records of Scotland data to show the percentage of children living in poverty across datazones.

The data is released annually and can be shown for the years between 2018/19 and 2023/24. Excerpts from the mapping are shown below and illustrate the overall pattern of child poverty rates have not changed substantially between 2018/19 and 2023/24, mainly aligning with higher SIMD levels. However, it has become more concentrated in those areas and nearby datazones, highlighting an increasing inequality with the least deprived parts of Edinburgh. This means that child poverty and its effect on health and wellbeing has become more concentrated in recent years, highlighting the importance in finding opportunities to tackle this.

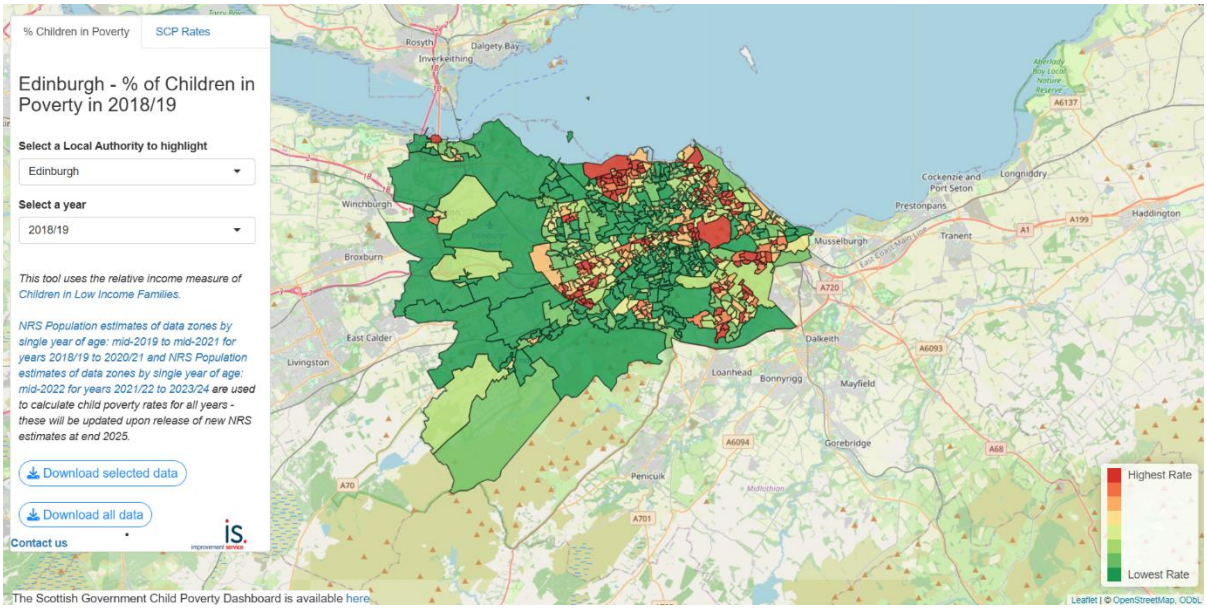


Figure 16.1: Percentage of children in poverty in Edinburgh 2018/19 (source: National Records of Scotland)

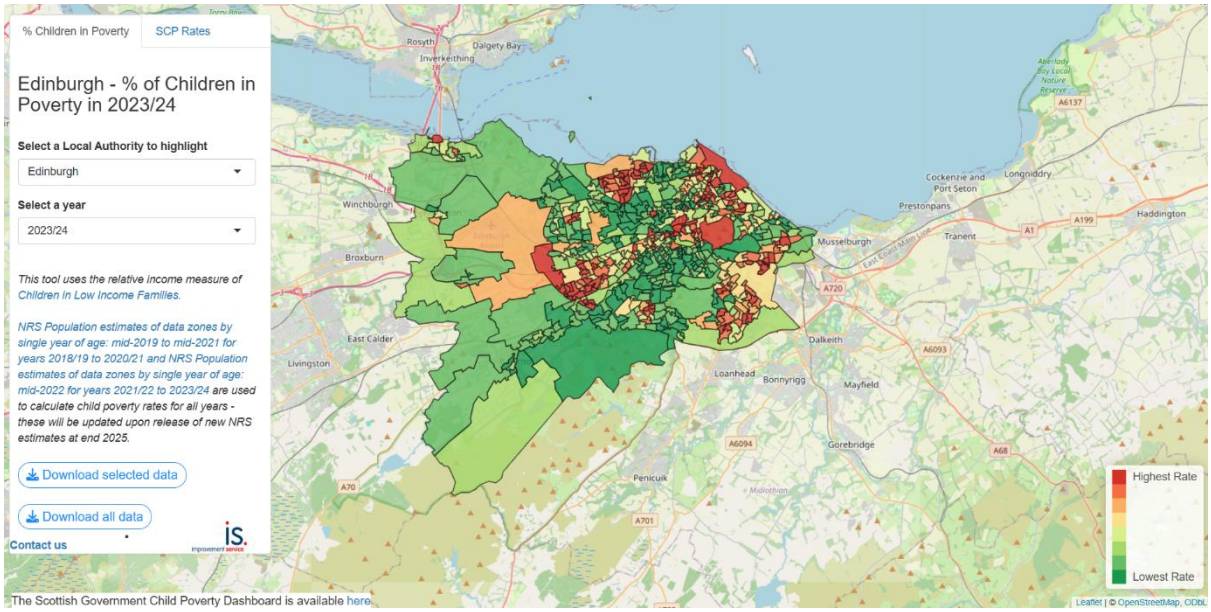


Figure 16.2: Percentage of children in poverty in Edinburgh 2023/24 (source: National Records of Scotland)

Actions to End Poverty in Edinburgh 2025 Update (published October 2025, Edinburgh Poverty Commission)

The Edinburgh Poverty Commission was formed in 2018 to provide an independent assessment of the causes of and solutions to poverty in Scotland's capital city. In 2020, the Council published the A Just Capital report, which set out calls to action needed to end poverty in Edinburgh by 2030.

For this 2025 report, the calls to action have been updated and refreshed. The key finding of an inquiry from the Commission is that there has been some, but not enough, progress to meeting the calls to action in the past five years, and that the next five years need to be a period of accelerated delivery and demonstration of impact.

The inquiry has reaffirmed the previous evidence gathered by the Commission on the links between poverty and poor health and wellbeing in Edinburgh. The causes of health and wellbeing inequalities are complex, but considered to be a combination of:

- Social and environmental factors – some of the most important building blocks of good health and wellbeing rest on a good job (particularly one that is flexible to a person's needs or disabilities), a good home, a safe place, a good education, a sense of community, and good local amenities in which to exercise, buy healthy food, and enjoy green spaces.
- Behavioural factors – poverty makes it more difficult to live a healthy lifestyle. A third of people in poverty in Scotland struggle to afford to feed their families properly every week, while the financial, mental health and other pressures of

poverty raise the likelihood poor health behaviours such as smoking, gambling, and harmful drug and alcohol consumption.

- Difficulties or delays in accessing health care – poverty makes it more difficult to access healthcare when people need it, due to the cost or time associated with travelling to appointments, or due to challenges in balancing work, care or other responsibilities with making an appointment for healthcare. As a result, people in poverty have higher levels of unmet or unidentified health needs, are less likely to find help at the early stages of a health condition and are more likely to have difficulty returning to work after a health crisis.

The 2025 Calls to Action therefore states that to help people in poverty enjoy equality in their health and wellbeing, Edinburgh needs action to:

- Make sure people in poverty have the access they need to life essentials like healthcare, transport, and learning, so that waiting for these services do not become barriers to people's progress in life
- Ensure people in poverty in Edinburgh have access to affordable, healthy food, green spaces, and safe community facilities in the places they live and work
- Help GPs and other health facilities in all areas of Edinburgh to act as hubs for wider preventative support as seen in the best practice examples we have seen in this city
- Support employers provide the flexibility needed to allow people with long term health conditions to stay in or return to work, and
- Reduce exposure, particularly for young people, to advertising and sales of health harming products and behaviours including tobacco, vaping, alcohol, gambling, and foods high in fat, sugar and salt.

In terms of the Proposed Plan, it will important to use the data and spatial information to determine if and how the strategy or policy framework can improve access to life essentials in line with the living well locally approach. This has influenced the evidence gathered and links to other topics to ensure that decisions made across all policy and spatial topics are made with the reduction of health and wellbeing inequalities in mind.

Joint Strategic Needs Assessment - Children and Young People in Edinburgh (published June 2025, NHS Lothian)

A Joint Strategic Needs Assessment (JSNA) is critical in informing the planning and commissioning of health and social care services, ensuring that resources are allocated effectively to improve health outcomes and reduce health inequalities. The JSNA focusses on identifying opportunities to support children, young people and families to develop and maintain good health and wellbeing.

The opportunities detailed below are of relevance to the Proposed Plan and positive health and wellbeing outcomes generally:

- Consider how the Plan can support requirements for public spaces to support key aspects of early years and children and young people's development, including smoke free public places; walkable neighbourhoods to support active travel and healthy weight and independent mobility; as well as breastfeeding-friendly and wider child and youth-friendly outdoor environments
- Explore options for protection from harmful commercial determinants of health such as exposure to advertising for the retail of health-harming commodities including tobacco, alcohol and foods high in fat, sugar and salt (HFSS) which are a key determinant of young people's health behaviours and corresponding outcomes
- Ensure that equitable access to high quality, child and young people friendly greenspace for playing, is prioritised as part of all development and regeneration opportunities in the city.
- Work as a Community Planning Partnership to systematically embed children's voices in the planning of spaces, opportunities and services, including through City Plan 2040 and as well as in future Community Plans and Children's Services Plans.

Creating positive health and wellbeing outcomes cuts across a number of topic papers and supporting documents including the Play Sufficiency Assessment. The Place Profiles look to assess how well children and young people can live in their particular area and what issues or gaps are identified in engagement. For the Proposed Plan, it is important that the needs of children and young people are taken into consideration with the future planning of different areas; as they tend stay in their immediate neighbourhood so the provision and availability of local amenities and services is particularly important.

The findings of the place and play engagement for children and young people have highlighted a number of health and wellbeing related issues notably: they would walk and cycle more if they felt more safe and there were designated routes, access to play space is important but there is not enough provision for teenagers, sports facilities are also important but not just football-related, and access to community activities that are not sport related such as cooking or art classes was highlighted. The engagement findings show that children and young people could be more engaged in activities to promote health and wellbeing but the opportunities are not always there.

Edinburgh Physical Activity and Sport Strategy 2024-2034 (published December 2024, City of Edinburgh Council)

The Edinburgh Physical Activity and Sport Strategy sets out how the Council will work together with key partners, the sector and local communities over the next ten years to increase the number of people who participate in physical activity and sport. The Strategy sets out ambitious plans to create opportunities for all to improve and

maintain their levels of activity through accessing the wide range of assets, and unique places and spaces in Edinburgh.

The key actions of relevance for the plan are:

- Embed active design principles in land-use policies — ensuring new and existing neighbourhoods support walking, cycling, and informal physical activity. This aligns with evidence that environments with better connectivity and active travel infrastructure increase physical activity.
- Ensure LDP allocations protect, enhance and connect parks, green networks, sports fields and community recreational spaces. Strategy objectives imply planning should prioritise equitable access to these assets for all ages and abilities.
- Work with transport, education, healthcare and community planning teams to align LDP policies with the strategy's action plans — for example, prioritising mixed-use, 20-minute neighbourhoods with safe public spaces.

These recommendations are considered in the Topic 01a Infrastructure - transport, Topic 6 Green blue infrastructure, open space and recreation, Topic 15 Local living and Topic 11 Design, quality and placemaking.

Access to healthy food and clustering of unhealthy uses

Priority Places for Food Index

The index is a composite formed of data compiled across seven domains in England, Scotland, Wales, and Northern Ireland. Its goal is to identify neighbourhoods that are most vulnerable to increases in the cost of living and which have a lack of accessibility to cheap, healthy, and sustainable sources of food making them a Priority Place for Food.

It assesses datazones in Scotland based on domains covering accessibility to food outlets and inequalities.

The mapping shows that within Edinburgh, a few datazones are within the top 20% in priority, clustering in Wester Hailes, Broomhouse and Stenhouse in the west, and Gracemount, Burdiehouse and Moredun in the south of the council area as shown in the map below extracted from the Priority Places for Food Index.

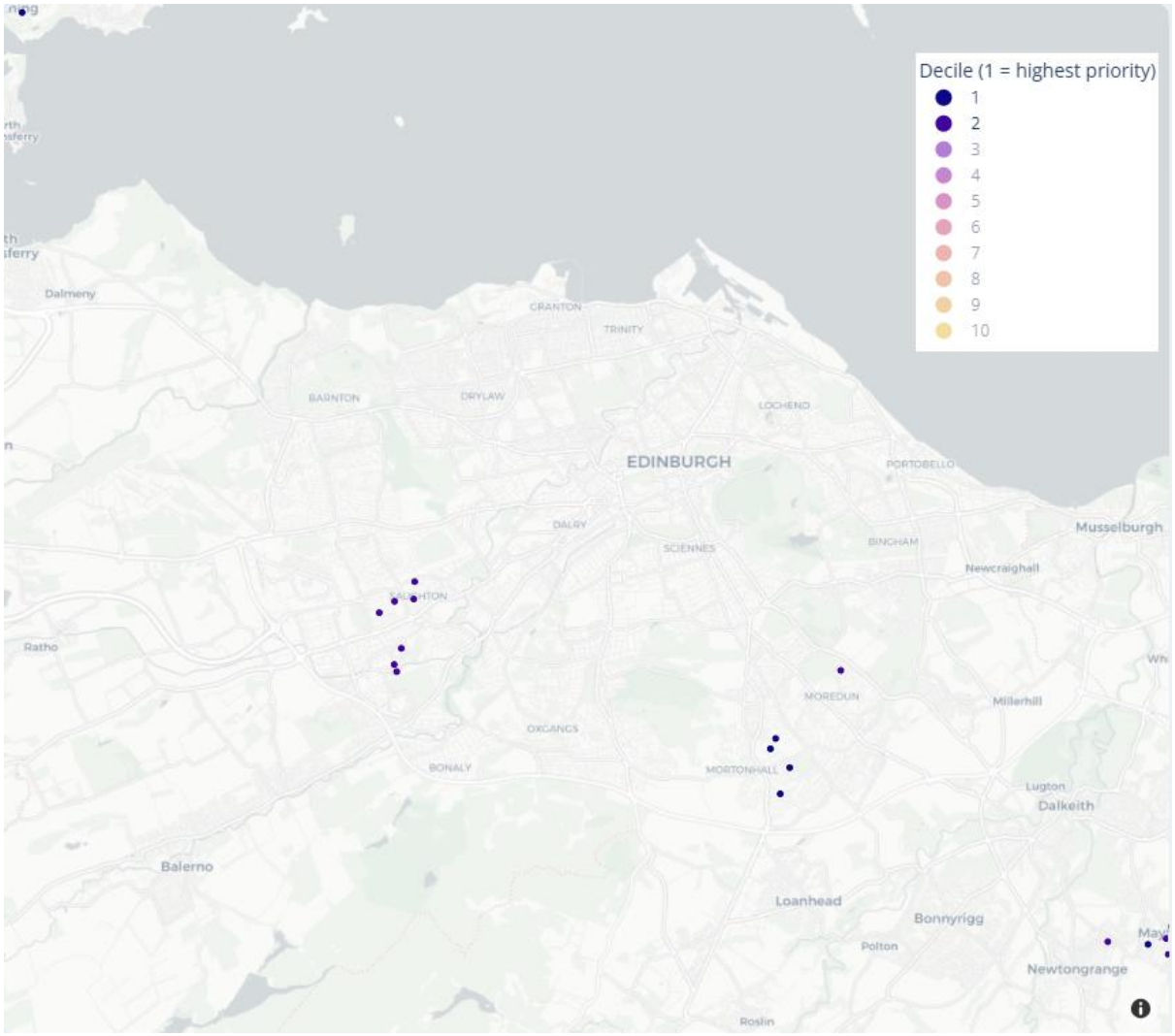


Figure 16.3: The Priority Places for Food Index showing Edinburgh area

The implication for the Proposed Plan is to consider ways to improve access to healthy food within the Priority Places listed above, particularly where this crosses over with proximity to clustered unhealthy uses as detailed below.

Edinburgh Retail Survey (2024)

Topic 19 City, town, local and commercial centres includes reference to a retail survey. The Council monitors the mix and changes of uses in the local, town and city centres through the Edinburgh retail survey. This survey has identified which centres show evidence of clustering of uses that negatively affect wellbeing. Uses that may affect health and wellbeing are betting shops, high interest money lending premises and hot food takeaways.

The clustering of hot food takeaways can be a concern in terms of the impact on residential amenity caused by night-time activity and an inevitable impact on health. The Council's existing Guidance for Businesses identifies a number of areas of restriction for this reason and covers hot food takeaways, public houses and entertainment facilities and the risk of further impact on residential amenity at night if additional facilities of this nature are granted consent. These are centred on the

Tollcross/Lothian Road, Bread Street/Grassmarket, South Clerk Street/Nicolson Street, and Leith Walk/Broughton Street.

In these areas, new proposals will only be accepted if there will be no adverse impact upon existing residential amenity and where acceptable, hours of operation will be restricted. The Edinburgh Retail Survey shows that these types of uses form a small percentage of units in the relevant town centres, however, the key issue is whether there is any evidence of clustering. Maps have been prepared to examine clustering and these show there is no evidence of clustering outwith the areas already identified in the Guidance for Businesses.

Although all the town centres have hot food takeaway services, betting shops were less common. No high interest money lending shops were found at all. With regard to local centres, there were three centres which showed signs of clustering. Sighthill local centre has three takeaways and one betting shop, and this represents 28% of all units in this small centre. The centre is very small and therefore clustering is more obvious despite the percentage. Walter Scott Avenue has five takeaways and one betting shop and this represents 42% of all units. This centre is a small straight parade of shops and therefore clustering is more prevalent. Lastly Pentland View Court has four takeaways and this represents 44% of all units. Again, this is a tight group of units and therefore clustering is more obvious.

It should be noted that the Sighthill local centre mentioned above is near to the Wester Hailes, Broomhouse and Stenhouse datazones identified as Priority Places for Food.

The number and clustering of these facilities will continue to be monitored as the Proposed Plan is prepared and this issue will be considered further and whether it needs to be addressed through policy.

Access to food growing spaces

Growing Locally – Edinburgh's Food Growing Strategy 2021-2026

Growing Locally is Edinburgh's first food growing strategy. It has three main aims:

- To grow more food in Edinburgh
- Encourage people to buy and eat more locally grown food
- Improve awareness of and engagement in sustainable food across the city.

This strategy notes the importance of local food growing in:

- Improving the physical and mental health and wellbeing of people and families across the city, reducing isolation and providing a means of bringing people together
- Improving place-making, helping to promote the Council's principle of '20-minute neighbourhoods.'

One objective to come from this strategy was to explore opportunities for creating new spaces for growing through Edinburgh's City Plan 2030 including the redevelopment of Granton Waterfront. This was achieved through the Place Policies within City Plan 2030 which identify where new growing spaces should be included as part of development. This strategy is expected to be refreshed and if so, this should be taken into account in the preparation of the Proposed Plan.

The local living mapping includes all existing allotments and community growing spaces to identify where they are currently concentrated and where gaps in provision exist. Topic 06 Green blue infrastructure, open space and recreation also assess growing space provision.

The findings of the 'what makes a good place' engagement show that people thoughts that access to growing space was important but there were not enough opportunities. For the Proposed Plan, it will be important to consider the opportunities to introduce new growing spaces particularly in areas where there is low provision.

Noise

Draft Agglomerations Noise Action Plan for Scotland – Environmental Noise (Scotland) Regulations 2006 (Published November 2025)

The draft Agglomerations Noise Action Plan for Scotland sets out that noise pollution, meaning unwanted or harmful sound, can impact human health and well-being in a number of ways, including sleep disturbance, annoyance, and increased risk of cardiovascular disease. Noise pollution can come from a range of sources such as business and industry and transport infrastructure. It does not provide Scotland or Edinburgh-specific data but notes that one million healthy life years lost in Western Europe every year due to noise from traffic alone according to World Health Organisation estimates.

The draft Agglomerations Noise Action Plan for Scotland has taken the output from the Round 4 noise maps and presents the areas across Scotland subjected to the greatest exposure to noise. These have been identified as candidate noise management areas (CNMAs). Where CNMAs have been confirmed as a Noise Management Area, the relevant local authority will then be able to consider the viability of any relevant mitigation measures. Candidate quiet areas (CQAs) have also been identified as part of the noise mapping process, where these are confirmed as Quiet Areas (QAs) consideration will be given to protecting their quieter sound profile.

Within the Edinburgh Agglomeration, the majority of CNMAs are centred on road-based noise with a small number of rail-based areas as shown in the map below. The CQAs are not shown in this map but are listed in the Draft Noise Action Plan and generally relate to parks.

Figure 16.4: Candidate Noise Management Areas in Edinburgh (source: Environmental Noise (Scotland) Regulations 2006, 2025)

One of the aims of the strategic noise maps is to help inform the public and stakeholders on environmental noise, and to support engagement in the development of a range of potential environmental noise policies, for example:

- prioritising noise mitigation measures like noise barriers and resurfacing roads
- setting local speed limits to support noise reduction
- being aware of noise implications in planning of new developments; and
- encouraging engagement on noise considerations in the development of local authority transport, planning, air quality plans and strategies.

It is intended that this new Noise Action Plan for Scotland will be considered as part of the Proposed Plan as the Draft Noise Action Plan is currently published for consultation until 31 December 2025. Edinburgh Airport will also separately draw up a Noise Action Plan which should be taken into account if it is available for the Proposed Plan stage.

The implication for the Proposed Plan is that this Strategic Noise Mapping will be used when assessing sites and policies in order to minimise or mitigate the effect on health and wellbeing.

Scotland Noise Maps (published 2021, Scottish Government)

In addition to the above, the strategic noise maps made available to the public give detail of the noise contours from different sources and will inform the new Noise Action Plan for Scotland and can be used as part of SEA assessment to determine noise impact on any possible new development sites identified in the Proposed Plan process alongside the specific actions to come from the Noise Action Plans.

Air Quality

The City of Edinburgh Council Air Quality Action Plan 2024 (published January 2024)

This Action Plan outlines the actions that will be taken to improve air quality in Edinburgh between 2024 and 2028. It notes the existing City Plan 2030 policy Env 22 with regard to air quality.

In compliance with Section IV of the Environment Act 1995, Edinburgh's Air Quality Action Plans (AQAPs) ensures that the Council and its partners work together towards meeting the statutory air quality objectives but also, where practicable and feasible, to reduce local air pollution emissions across the city. This is consistent with the priorities of the national Scottish air quality strategy - Cleaner Air for Scotland 2 (CAFS2), which provides national policy support for a precautionary public health approach to air pollution.

The Council's proposed actions consist of measures under eight key themes:

- Low Emission Zone (LEZ)
- Strategic Transport
- Behavioural Change to Active Travel
- Public Transport
- Low Emission Vehicles
- 2030 Climate Strategy
- Integrated Policies and Guidance
- Domestic Emissions.

The City of Edinburgh Council has declared six Air Quality Management Areas (AQMAs), five for the pollutant nitrogen dioxide (NO_2) and one for fine particulates (PM10).

Even without the effect of the pandemic, long term trends show concentrations of the main pollutants are decreasing at most locations across the city, albeit there are areas of concern, especially in the Central AQMA. This area has historically had the greatest number of sites exceeding the objectives and some of the highest concentrations in the city. The appraisal work for the Low Emission Zone scheme concluded that the City Centre was a priority for action.

This AQAP focuses predominately on the NO_2 (traffic related) AQMAs, although the need to reduce local air pollutant emissions across Edinburgh is also noted and incorporated.

To deliver on priorities, the AQAP contains a series of actions, of which several are particularly relevant to land use planning and the local development plan process, including:

- Update Edinburgh planning guidance to incorporate a greater provision of electric vehicle (EV) infrastructure in new developments (this was completed in September 2025 when updated Council parking standards for new developments were adopted)
- Use UK APAS (Air Pollution Assessment Service) to investigate the impacts of City Plan development on air quality in the long term
- Ensure placemaking strategies and guidance including Place Briefs take account of air quality, especially considering the juxtaposition of land-uses in and around the Leith Docks*
- The need for some planning applications to include a Construction Environmental Management Plan*
- Set up a forum with the Council, housing developers, landowners, businesses and community to helps address the cumulative impact of development on environmental protection matters in/around certain areas*.

* These actions are currently (in-part) in draft form in the Draft Salamander Street AQAP, which is due to be finalised in January 2026.

Air quality is also covered in further detail in Topic 01a Infrastructure – transport. It is important that the Proposed Plan takes the Air Quality Action Plan into account when assessing possible development sites and policies in order to minimise or mitigate the effect on health and wellbeing. Any policy or guidance will be aligned with the actions in this Action Plan.

Proximity to health infrastructure

Place Profiles

The Place Profiles created for each of the 17 Electoral Wards within the Council area form part of the Evidence Report and provide a spatial focus in line with NPF4 and related guidance. They link to the creation of a new place-based, people-centred and delivery-focussed local development plan.

The Place Profiles provide an in-depth assessment of that ward area including the health and wellbeing of the people living there by looking at the relevant data. As indicated in the previous assessment of health data, the Place Profiles help to identify those areas which have lower access to environmental factors which have a positive effect on health and wellbeing. The Proposed Plan will explore how those gaps could be addressed.

The Place Profiles include the elements that are considered to have an impact on health and wellbeing and utilise data contained within other topic papers including:

- SIMD information
- Health infrastructure mapping
- Public transport and active travel access
- Community and cultural infrastructure access
- Blue green network access, including open space and play spaces; and
- Allotments and growing spaces.

The Place Profiles will be used to look at inequalities in terms of deprivation as well as gaps in provision or access and explore ways that these can be addressed in the Proposed Plan.

Summary of stakeholder engagement

Key Agency	**NHS Lothian**
Main views raised	• **Draft Topic Papers (Nov 2025):** NHS Lothian Public Health: Further emphasis on prevention and addressing inequalities, and inclusion of additional policy context and evidence base. Reference to CRESH mapping of health determinants. The summary of implications should also take cognisance of the impact of the wider Commercial Determinants of Health, beyond the food environment. Along with vulnerable groups and those most impacted by inequalities, the needs and perspectives of children and young people should feature prominently throughout summaries of implications for the evidence topic areas.
Council response and implications for the proposed plan	Added emphasis on prevention and addressing inequalities, added local and national policy context around systemic approach to health and wellbeing and local population trends, added Health and Wellbeing Census information for school age children. CRESH mapping not used due to duplication with other evidence source and certain subjects like tobacco and alcohol outlets being outwith planning control.
Is the agency content with the evidence?	NHS Lothian does not dispute any of the evidence set out in the topic paper. They have advised: 'With regards the Evidence Report, NHS Lothian Population Public Health Team are pleased to see the extent to which our comments and suggestions have been considered and incorporated. We are in general agreement that there is sufficient evidence provided across the topic papers to effectively support the development of the Local Development Plan.'

Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Continued working with NHS Lothian on the development of the Proposed Plan particularly on a place-based approach.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** Within the table on page 9 topic paper 12: Housing Land should be added to each row under the Evidence report to account for the contribution housing makes to place and wellbeing. This also reflects the contribution good quality housing makes to prevention in the health and care system, as detailed in the NHS Lothian report: A strengthened approach to prevention across the Lothian health and care system (published August 2024). In addition to the Draft Agglomerations Noise Action Plan for Scotland – Environmental Noise (Scotland) Regulations 2006 (Published November 2025), Scotland's noise contours should also be referenced to allow this to be understood and included as evidence. This evidence will further aid the consideration of health and wellbeing when considering sites and policies in the emerging local development plan.
Council response and implications for the proposed plan	The NHS Lothian report: A strengthened approach to prevention across the Lothian health and care system refers to housing as a contributor to health but this relates to affordability, quality and stability not housing land. It is not appropriate to include housing land in this topic paper. The noise contours detailed have been added as an evidence source to be considered alongside the Noise Action Plans.
Is the agency content with the evidence?	HfS does not dispute the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.

Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other engagement and matters raised

Public Health Scotland:

Early meeting with Public Health Scotland to discuss resources and contact available for both the Topic Papers and Place Profiles, with commitment to using these to produce the Evidence Report. We received early positive feedback towards our approach.

Summary of implications for the Proposed Plan

Health and wellbeing will be a key theme in preparing the Proposed Plan. It will be a consideration in terms of aims and outcomes, spatial strategy, policies and place-based proposals given the different elements that can help mitigate and reduce health and wellbeing inequalities. The specific health and wellbeing implications are summarised below but there are implications in other topic papers which also relate to improving health and wellbeing.

Strategy

- Demographic analysis of Edinburgh shows two key patterns based around inequalities between areas of high and low deprivation and age. High deprivation and older age result in an increase in poor health and disease in general, with projections showing that the population of Edinburgh will be larger and older in the future. Prevention is important to mitigate impact on health services and the Proposed Plan will need to take account of this.
- A strand of the Proposed Plan should be to embed prevention of poor health through addressing the social determinants of poor health in line with national and NHS Lothian strategies.
- Due to the link between deprivation and poor health, the strategy of the Proposed Plan should seek to reduce economic inequality.
- The Proposed Plan will be prepared with continued engagement with NHS Lothian, Public Health Scotland and the Edinburgh Health and Social Care Partnership.
- The Proposed Plan will take locations of awareness of suicide into account sensitively.

Determinants of Health

- Health and wellbeing will be a theme that is embedded in the Proposed Plan and will be a key consideration in the development of the spatial strategy, place-based proposals and policies.
- Assessment and analysis of different wards to understand how well local living is being achieved and what might be missing or what barriers might exist to prevent people including children and young people, particularly in areas of higher deprivation from accessing facilities and amenities that support health and wellbeing.
- The areas of clustering of unhealthy uses and priority places in need of better access to healthy food are mapped in the Place Profiles and the Proposed Plan can explore if it can address gaps in provision and explore potential methods to prevent clustering of unhealthy uses.
- Strategic Noise Mapping will be used when assessing sites and policies in order to minimise or mitigate the effect on health and wellbeing.
- The Air Quality Action Plan will be used when assessing possible sites and policies in order to minimise or mitigate the effect on health and wellbeing. Any policy or guidance will be aligned with this Action Plan.
- The Strategic Environmental Assessment (SEA) will assess likely significant environmental effects on human health.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

17: Community wealth building

Topic	**17: Community wealth building**
Description of topic	Review of evidence of ongoing and planned work in Edinburgh contributing to community wealth building principles.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5) - set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used.
Relevant NPF4 Policies	• Policy 15 Local Living and 20 minute neighbourhoods • Policy 25 Community wealth building
Local Development Plan Guidance	• Community wealth building (page 79) sets out that the Evidence Report is likely to include Community Wealth Building (CWB) strategies and action plans. Such strategies will be part of, or form, that authority's overall economic plan. • Informed by these strategies, the Evidence Report can identify community asset transfers in progress and/or being explored. Use of the Community Wealth Building (CWB) model can also shape more general development of a local economy that seeks to retain more wealth in communities. In this way, creation of a more 'wellbeing' focused local economy can be assisted. To inform this, local economic statistics on employment, key sectors, and investment land and sites are likely to be relevant to the Evidence Report. • The Evidence Report can identify the planning authority's CWB priorities, as laid out in their CWB strategy, that will be relevant to consider in the preparation of the LDP.
Linked Topic Papers	• Topic 06 Green blue infrastructure, open space and recreation • Topic 15 Local living • Topic 16 Health and wellbeing • Topic 18 Economy, business and industry • Place Profiles
List of and links to evidence	• **CD197** Scotland's National Strategy for Economic Transformation, Scottish Government, March 2022 • **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023 • **CD234** Community Wealth Building (Scotland) Bill, Scottish Parliament, March 2025

- **CD373** The City of Edinburgh Council Community Wealth Building Plan, City of Edinburgh Council, December 2025
- **CD451** A Just Capital: Actions to End Poverty in Edinburgh, Edinburgh Poverty Commission, September 2020
- **CD340** Place-Based Property Improvement Programme, City of Edinburgh Council, September 2024
- **CD374** Third Sector Support Review, City of Edinburgh Council, April 2025
- **CD375** Third Sector Support Review Data, City of Edinburgh Council, April 2025
- **CD313** Growing Locally – Edinburgh's First Food Growing Strategy 2021-2026, City of Edinburgh Council, April 2021
- **CD050** Edinburgh's Local Place Plan Register, City of Edinburgh Council, accessed April 2026
- **CD038** Edinburgh Economic Needs Study: Economic Overview: Biggar Economics (City of Edinburgh Council, February 2025
- **CD042** Edinburgh Economic Needs Study: Industrial Report, Ryden (City of Edinburgh Council), September 2025
- **CD041** Edinburgh Economic Needs Study: Office Report, Ryden (City of Edinburgh Council), July 2025
- **CD037** Economic Needs Study: Summary and Land Use Implications, Ryden (City of Edinburgh Council), November 2025
- **CD267** Community Asset Transfers email, City of Edinburgh Council, April 2026
- **CD268** Competed CATS at February 2026, City of Edinburgh Council, February 2026

List of matters covered

This topic paper considers the policy context and evidence in relation to community wealth building in the City of Edinburgh Council area. It includes the following:

- National and local policy context
- Community Asset Transfers
- Economic Needs Study
- Local Place Plans
- Place Profiles

Summary of evidence

National

Scotland's National Strategy for Economic Transformation 2022 (published 1 March 2022)

Scotland's National Strategy for Economic Transformation sets out the aims for Scotland's economy over the 10 year period to 2032.

Within the Programme of Action: Project 10, it sets out the requirement to introduce community wealth building as part of a wider aim to make Scotland's businesses, industries, regions, communities and public services more productive and innovative.

National Planning Framework 4 (published 13 February 2023)

Policy 25 Community wealth building sets out that local development plans (LDPs) should be aligned with any strategy for community wealth building for the area. Spatial strategies should address community wealth building priorities; identify community assets; set out opportunities to tackle economic disadvantage and inequality; and seek to provide benefits for local communities.

Community Wealth Building (Scotland) Bill 2025 (explanatory notes published 20 March 2025)

This Bill is currently passing through Parliament and places a new requirement on local authorities and the relevant public bodies in the area of that local authority to prepare a community wealth building action plan.

The implication for the Proposed Plan of these national policy documents is that it is the responsibility of the planning authority to align our policy with the Council's Community Wealth Building Plan 2026-2029 as well as seeking to embed community wealth building within decision-making processes.

Local Context

The City of Edinburgh Council Community Wealth Building Plan 2026-2029 (published December 2025, City of Edinburgh Council)

Community wealth building (CWB) is an alternative approach to economic development that aims to make sure that local assets and resources are used in a way that actively empowers and benefits the local community. It is a broad approach that touches upon a wide range of Council services. For CWB to be effective, joined-up action is needed across the whole organisation. To facilitate this, an internal CWB Working Group has been established to bring together the core service areas. This group has been working together to look at how CWB fits into existing and future workstreams, and to start to co-design specific CWB projects. So far, this work has highlighted that many of the Council's CWB aims are already being progressed by existing policies, strategies and programmes.

The Community Wealth Building Plan is focussed on 5 key pillars, of which Land and Property is of most relevance to the Proposed Plan and planning in general. This incorporates these areas of action:

- Involving communities in land and property decisions, and meeting community needs
- Supporting community ownership of local assets.

The Community Wealth Building Plan has 10 objectives organised under 3 priority headings. The following is relevant to the Proposed Plan:

- Priority 2 – Deliver innovative change in Council policies and practices
- Objective 5 - Support access to land and buildings for communities, third sector organisations and local enterprises
- Action - Support Community Wealth Building objectives through City Plan 2040, including exploring opportunities associated with community ownership, affordable workspace and meanwhile use.

As the Proposed Plan is developed, there will be collaboration with the relevant Council officers to incorporate the community wealth building aims and actions detailed in the Community Wealth Building Plan. Evidence below is of relevance to these actions.

A Just Capital: Actions to End Poverty in Edinburgh (published September 2020, Edinburgh Poverty Commission)

The Edinburgh Poverty Commission is an independent group who have been working together since the end of 2018 to define the actions needed to end poverty in Edinburgh. This report is a call to action to everyone in the city: City of Edinburgh Council, the Edinburgh Partnership, the Scottish and UK Governments, the third sector, business, communities and citizens of Edinburgh.

The report identifies seven areas of action, each highlighting a set of challenges and solutions emerging from the commission's inquiry. Each action area sets out the city partners who need to act, and the fundamental changes they need to make.

Overall, ending poverty in Edinburgh means delivering actions to make sure that everyone in Edinburgh can expect:

- The right support in the places we live and work
- Fair work that provides dignity and security
- A decent home we can afford to live in
- Income security that offers a real lifeline
- Opportunities that drive justice and boost prospects
- Connections in a city that belongs to us, and
- Equality in our health and wellbeing.

When developing the Proposed Plan and its policies, this should be used as a reference to determine a strategy to maximise action against poverty using the plan. This has a number of crossovers with the overall aims of community wealth building.

Place-based Property Improvement Programme, City of Edinburgh Council (committee report published September 2024)

The overarching aim of the Council's programme is to improve access to services for residents at the same time as reducing the number of properties from which services will be delivered. The approach is designed to enhance the overall facilities and services available within local communities. Properties will only be declared surplus to requirements when agreement on the alternative service delivery option is reached through detailed engagement within a local area.

This programme will ensure that as Council property is rationalised, the intention would be to integrate learning estate, libraries, sports, health, care and community centre infrastructure within local neighbourhood campuses utilising, improving and replacing buildings where necessary so that services are delivered from fit for purpose facilities.

When considering future options for the purpose and use of Council buildings across the city, community hubs should provide attractive, inclusive, and accessible spaces for citizens to engage in a wide range of personal and work-related activities. They should cater to a diverse spectrum of cultural, social, health and economic requirements within neighbourhoods and deliver access to high quality essential services, recreational activities, and learning opportunities, reflective and inclusive of local need. These needs will differ for every community, often led by social, demographic and technological change.

To progress these opportunities, the following ongoing engagement activities require to be co-ordinated:

- Libraries review
- Community Centre review
- City Plan 2040 place engagement, Proposed Plan engagement and submitted Local Place Plans
- Ongoing engagement with communities for existing property delivery projects; and
- Local housing led regeneration initiatives.

There are also ongoing initiatives to:

- Transform community planning partnership neighbourhood delivery groups
- Ensure children's voices are included in decisions around place and planning through the Edinburgh Children's Partnership
- Revise service delivery models based on a prevention led approach; and
- Create service delivery 'Teams around the Learning Community'.

Given the place-based and people-centred approach to the plan, it is important that the wider Council initiatives are taken into consideration in the Proposed Plan process to ensure a joined-up and collaborative approach.

Third Sector Support Review (published April 2025, City of Edinburgh Council)

The Council conducted a review of how it supports and works with third sector organisations in Edinburgh.

Overall, 84 responses were received from third sector organisations. Responses give an indication of where organisations feel pressure and want to see future assistance.

When asked what the three biggest challenges in the previous four months organisations had faced in trying to deliver its planned programmes or services, 10 organisations listed accommodation, property and/or access to venues as one of these challenges, although this was lower than those who listed cash flow, funding, costs and future uncertainty as challenges.

When asked what assistance the Edinburgh Partnership could provide, the majority of organisations responded that they wanted to see greater and/or more consistent funding. Three organisations responded saying they would like new or better premises in the short term (within that financial year) and three responded that they would like new or better premises in the medium term (1-3 years).

When asked what opportunities there are for the third sector to work better in Edinburgh, 23 organisations responded that they would like to see greater collaboration, partnership working or shared resources. This demonstrates that while relatively few organisations explicitly mention space and premises as a priority, there is an openness to sharing resources which can save organisations money and time and increase collaboration. Other comments have supported the idea of using Council property or shared hub spaces, although these comments are fewer than those expressing over concerns with funding.

The Proposed Plan can explore whether there are opportunities to help deliver lower cost space/ premises for social enterprises and third sector organisations particularly in areas that would benefit from having support close to where people live.

Growing Locally – Edinburgh's Food Growing Strategy 2021-2026 (published April 2021)

Edinburgh's food growing strategy, as set out in Topic Health and wellbeing, also has implications for community wealth building.

The objective to explore opportunities for creating new spaces for growing, is currently represented in City Plan 2030's Policy Inf 1 Access to Community Facilities which seeks to protect existing growing spaces while promoting new ones, as well as specific Place Policies which include growing spaces within their development principles.

This strategy promotes local control of land and encourages people to buy and eat more locally grown food, increasing the value that local communities gain from land and property assets.

The Place Profile mapping includes all existing allotments and community growing spaces to identify where they are currently concentrated and where gaps in provision exist. Further detail and policy context on this is to be found in Topic 06 Green blue infrastructure, open space, and recreation.

Community Asset Transfers

Engagement both internally, with Community Asset Transfer officers within the City of Edinburgh Council, and externally, with the Community Ownership Support Service at the Development Trust Association Scotland has been undertaken to ensure there is a record of Community Asset Transfers of land and property both complete and in progress. This includes land and property previously or currently owned by the Council as well as other organisations.

For Community Asset Transfers currently in progress, it has been advised that transfers which are at stage 2 of the two-stage process should be noted as having a high chance of reaching completion, due to the process being supported by a business plan and financing information.

Transfers of Council-owned land and buildings:

- **13 complete**
- **0 in progress**

Property	Address	Community body	Disposal/date	Ward
Gilmerton Dykes Bothy	26b Gilmerton Dykes St	Friends of Burdiehouse Burn Valley Park	Sale Concluded 10 January 2019	16
St Oswalds Hall	Montpelier Park	Bruntsfield Primary Parent Council and Eric Liddell Centre	Sale Concluded 31 March 2021	10
Juniper Green Public Toilet	531 Lanark Road	JGCC Juniper Green Community Council	Sale Concluded 8 April 2021	2
Old Coach House	Spylaw Park	Colinton Village Enterprise	Sale Concluded 6 July 2021	8
4 Duncan Place	Duncan Place	Duncan Place Resource Centre Management Committee	Sale Concluded 3 October 2024	13
Victoria Primary School	Newhaven Main Street	The Heart of Newhaven	Sale Concluded 15 August 2022	4

North Edinburgh Arts Centre	Pennywell Crescent Muirhouse	North Edinburgh Arts Centre	Sale Concluded 30 August 2022	1
Whale Arts Centre	30 Westburn Grove, Edinburgh	Whale Arts	Sale Concluded 19 February 2024	2
10 Wardieburn Road	10 Wardieburn Road Edinburgh	Granton Community Gardeners	Sale Concluded 17 November 2023	4
Westfield House	5 Kirk Loan Edinburgh	Corstorphine Community Centre	Sale Concluded 20 February 2024	6
Gracemount Mansion	47 Gracemount House Drive Edinburgh	Friends of the Mansion	Sale Concluded 7 May 2025	16
Land at Murrayburn Grove	Murrayburn Grove Edinburgh	South East Edible Estates	Sale Concluded 9 December 2025	2
Ravelston Pavilion	Craigcrook Road	Blackhall Community Trust	Sale Concluded 16 January 2026	5

Figure 17.1: Transfers of Council-owned land and buildings

Transfers of land and buildings owned by other organisations:

- **3 complete**
  - Balerno Police Station transfer to Balerno Village Trust, 1 October 2025
  - Bellfield Church, Portobello to Action Porty, 6 September 2017
  - Portobello Police Station transfer to Action Porty, 23 March 2026
- **0 in progress**

Where Community Asset Transfers are in place or being proposed, the Proposed Plan will explore the opportunities to support the proposed use and help retain a community-owned asset where the proposal aligns with relevant development plan policies.

Economic Needs Study

In 2025, the Council commissioned consultants to prepare an Economic Needs Study, further details of which are set out in Topics Economy, business and industry, City, town, local and commercial centres, and Tourism, culture and creativity. Evidence of relevance to Community Wealth Building is set out below.

Business and Industry

- Prime rents have increased to £140-£150 per sqm. Higher rents of £150-£190 per sqm may be achievable for premium small to medium sized units. Average rents are lower at £100 per sqm. While the highest rents can support new development and refurbishment, they can also present significant cost implications for businesses.

Offices

- The principal outcome of trends is a continuing shortage of grade A office space in the city centre, despite it being a focal point for demand and sharp rises in rent. In contrast, the out-of-town market has reduced demand and vacant buildings leading to oversupply and limited prospects for private sector investment due to low demand and poor rent growth. This has implications for affordability of spaces, particularly in the most accessible or central areas.

Economic Conclusions and Land Requirements

- Specialist sectors (research and innovation, creative industries and technology incubation) are flagged for potential growth, which is likely to take place on existing dedicated campuses. Consideration will need to be given to whether there is sufficient spare capacity in these locations to absorb this growth.

Poverty, Disadvantage and Inequality

Although Edinburgh is an affluent city, there are concentrated pockets of deprivation across the city as demonstrated by the Scottish Index of Multiple Deprivation outlined in the Place Profiles and in Topic 16 Health and wellbeing.

It is important that people can access work close to home as well as having more good public transport links to areas of employment. It is important to support the development of small local businesses and start-ups to generate community wealth. There are designated areas of economic importance and land for business and industry close reasonably close to areas of deprivation.

During the preparation of the Proposed Plan, it is important to assess the city's current areas of economic importance and business and industry areas including small scale manufacturing and business units and their relationship to areas of deprivation; and explore the need to maintain and support such areas to provide local job opportunities.

The Council will explore opportunities through the Proposed Plan to address the challenges of high rent and low availability that can affect the availability of affordable workspaces.

Local Place Plans

Producing a Local Place Plan gives communities the opportunity to shape the future of their local area by creating a plan that addresses local needs or concerns. The Council is required to take these plans and their proposals into account when preparing the Proposed Plan; including informing the Evidence Report stage.

The Council has invited communities to prepare Local Place Plans and has actively promoted this opportunity. The Engagement Report provides more detail on the Local Place Plan promotion and support.

The implications for the Proposed Plan are that Local Place Plans will be seen as one of the ways that communities can collaborate and influence the use of land and property in their local area in line with the aims of the Community Wealth Building Plan. Specific proposals for community ownership, affordable workspace and meanwhile use will be assessed as part of this, as an action relating to the Community Wealth Building Plan 2026-2029.

It is unlikely that Local Place Plans will be submitted for every place in Edinburgh, therefore when preparing the Proposed Plan, the Place Profiles, place engagement, Call for Ideas and any subsequent engagement will be used to understand what different communities would like to see happen in their area and what could be delivered through the local development plan process.

The following Local Place Plans have been registered with the Council:

- Astley Anslie Local Place Plan
- Midmar Paddock Local Place Plan
- Wester Hailes Local Place Plan

Registered Local Place Plans have been taken into account in the Place Profiles.

Place Profiles

The Place Profiles, which form part of the Evidence Report, assess what business, employment and third sector/ community space is available in the ward to support local economic activity and to provide support within communities, particularly in deprived areas. The implication for the Proposed Plan is to explore whether existing space and premises should be protected or increased to encourage local employment.

Summary of stakeholder engagement

Key Agency	**NHS Lothian**
Main views raised	• **Draft Topic Papers (Nov 2025):** Uneven spread of Local Place Plans and other work relating to inequalities means that the Council should directly support communities to produce Local Place Plans. Needs of disadvantaged communities should be prioritised as a key tenet of planning around land use and economic development.
Council response and implications for the proposed plan	Local Place Plans have been promoted through by the Council and meetings held with interested communities directly (full measures are set out in the Engagement Report). However, production of these must be community-led according to legislation and guidance. The Place

	Profiles and place engagement will be used to focus on disadvantaged areas when preparing the Plan.
Is the agency content with the evidence?	NHS Lothian does not dispute any of the evidence set out in the topic paper.
Areas of agreement	In general agreement that there is sufficient evidence provided across the topic papers to effectively support the development of the Local Development Plan. Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	Continued working with NHS Lothian on the development of the Proposed Plan particularly on a place-based approach.

Key Stakeholder	**Homes for Scotland**
Main views raised	• **Final Topic Papers (March 2026):** It would be beneficial if the Local Place Plans (LPP) section could list where there are existing LPPs or LPPs being prepared. If possible, a map detailing this would aid understanding. Detailing this information will allow homebuilders to engage as appropriate with the body creating the LPP to potentially allow any future housing proposals to be incorporated into the LPP.
Council response and implications for the proposed plan	Links to the Local Place Plans added based on Local Place Plan register on website.
Is the agency content with the evidence?	HfS does not dispute the evidence set out in the topic paper.
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other engagement and matters raised

Internal discussions and meetings with officers and working group preparing the City of Edinburgh Council Community Wealth Building (CWB) Plan in order to align the evidence with the CWB plan as it was being developed.

Summary of implications for the Proposed Plan

In preparing the Proposed Plan, the community wealth building will be a theme which will inform various elements of the Proposed Plan.

The implications are summarised below:

- Explore how the Proposed Plan can support the community wealth building aims and actions detailed in the Community Wealth Building Plan as well as the work of the Edinburgh Poverty Commission.
- Wider Council initiatives and projects such as the Place Based Property Improvement Plan will be considered as part of the plan process and explore how these can be supported.
- Explore opportunities to provide new growing spaces in the Proposed Plan in line with the Food Growing Strategy as a means to increase community use of land and property.
- Explore the need to maintain and support business and industry areas including small scale manufacturing and business units to provide local job opportunities and start-up businesses particularly where close to areas of deprivation.
- Local Place Plans will be taken into account in the preparation of the Proposed Plan and will have regard for specific proposals for community ownership, affordable workspace and meanwhile uses, as an action relating to the Community Wealth Building Plan 2026-2029.
- Where Community Asset Transfers are in place or being proposed, the Proposed Plan will explore the opportunities to support proposals.
- Explore opportunities through policy and spatial strategy to address the challenges of high rent and low availability that can affect the availability of affordable workspaces for third sector organisations and social enterprises as an action relating to the Community Wealth Building Plan 2026-2029.

Statements of agreement / dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies and other stakeholders have been addressed in revisions to topic papers, a response provided or noted for the plan preparation stage.

18: Economy, business and industry

Topic	**18: Economy, business and industry**
Description of topic	An overview of the economic context affecting Edinburgh, and an assessment of the issues, trends and land use implications associated with business, including offices and industrial sectors.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** • Section 15(5) – sets out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used.
Relevant NPF4 Policies	• Policy 26 Business and industry
Local Development Plan Guidance	• Policy topic Business and Industry (page 81) sets out that the Evidence Report can be informed by Business and Industry Land Audits which monitor the location, size, planning status, existing use, neighbouring land uses and any significant land use issues (e.g. underused, vacant, derelict) of sites within the existing business and industry land supply. • It states that identifying the principal economic characteristics of the area is likely to require use of up-to-date market intelligence and demand forecasting that also informs economic strategies. • The Evidence Report may also refer to analysis of employment need, local poverty, disadvantage and inequality, to identify where future business and industry development may provide most benefit.
Linked Topic Papers	• Topic 15 Local Living • Topic 17 Community wealth building • Topic 20 Tourism, culture and creativity • Place Profiles
List of and links to evidence	• **CD033** City Plan 2030- Written Statement, City of Edinburgh Council, November 2024 • **CD038** Economic Needs Study: Economic Overview, Biggar Economics (City of Edinburgh Council), February 2025 • **CD042** Economic Needs Study: Industrial Report, Ryden (City of Edinburgh Council), September 2025 • **CD041** Economic Needs Study: Office Report, Ryden (City of Edinburgh Council), July 2025

- **CD037** Economic Needs Study: Summary and Land Use Implications, Ryden (city of Edinburgh Council), November 2025
- **CD040** Economic Needs Study: Leisure, Ryden (City of Edinburgh Council), October 2025
- **CD039** Edinburgh Economic Needs Study: Retail Study, Roderick Maclean Associates and Ryden (City of Edinburgh Council), September 2025
- **CD197** Scotland's National Strategy for Economic Transformation, Scottish Government, March 2022
- **CD108** Edinburgh and South East Scotland Regional Prosperity Framework (2021 – 2041), City Region: Edinburgh & South East Scotland
- **CD082** Edinburgh Economy Strategy, City of Edinburgh Council, November 2021
- **CD074** Edinburgh Local Development Plan 2016 , City of Edinburgh Council, November 2016
- **CD690** The UK's Modern Industrial Strategy, March 2026, UK Government (department for Business and Trade), March 2026
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023

List of matters covered

This topic paper gives a broad overview of the Edinburgh economy before examining in more detail matters relating to business, industry and offices within Edinburgh. It covers:

- National Context
- Regional Context
- Local Context
- Economic Needs Study
    - Edinburgh Economic Overview
    - Business and Industry Paper
    - Office Paper
    - Summary and Land Use Implications Paper
- A review of economic indicators
- Assessment of current business and industrial land supply
    - Industry Sector
    - Office Sector
- Economic Needs Study – Summary and Land Requirements
- Poverty, disadvantage and inequality.

Summary of evidence

National Context

Scotland's National Strategy for Economic Transformation 2022 sets out priorities for Scotland's economy over a 10-year period. The strategy identifies some of Scotland's long-standing economic challenges including weak productivity compared to international competitors, a relative lack of new business growth and persistent poverty. The strategy sets out five policy programmes of action, with a focus on the vision of creating a wellbeing economy. These are:

- Establishing Scotland as a world-class entrepreneurial nation founded on a culture that encourages, promotes and celebrates entrepreneurial activity in every sector.
- Strengthening Scotland's position in new markets and industries generating new well-paid jobs from a just transition to net zero.
- Make Scotland's businesses, industries, regions, communities more productive and innovative.
- Ensure that people have the skills they need and meet the demands of an ever-changing economy and society, and that employers invest in the skilled employees they need to grow their businesses.
- Reorientate our economy towards wellbeing and fair work, to deliver higher rates of employment and wage growth, to significantly reduce structural poverty, and improve health, cultural and social outcomes for disadvantaged families and communities.

The UK's Modern Industrial Strategy, along with the accompanying eight sector plans, published in December 2025 sets out a ten-year plan by the UK Government to deliver strong secure economic growth. The Strategy seeks to create favourable conditions in key UK sectors, and back eight sectors with the highest potential: advanced manufacturing, clean energy industries, creative industries, defence, digital and technologies, financial service, life sciences, professional and business services (IS-8). In addition, it looks to support frontier industries and target places and clusters across the UK that support these key sectors. The government will track key measures of improvement, the IS-8 and places. In particular:

- The government will make it easier and simpler for companies to do business, giving them the stability to make long term investments.
- The government will enable investment and growth in city regions and clusters across the UK where the IS-8 are based.
- The government is taking targeting action to transform our highest potential sectors over the next decade through sector plans.
- The government will create an enduring partnership between business and a stronger more capable and agile state, with deeper understanding of business expertise and needs.

The UK Government seeks to renew its partnership with the Scottish devolved government and will provide up to £750 million for a supercomputer hosted by the University of Edinburgh. It is also looking to strengthen connections between the city regions, particularly the central belt, and realise the productivity potential of them.

Regional

Edinburgh and South East Scotland City Region Deal

The City Region Deal is a mechanism for accelerating growth by pulling in significant government investment. By investing this funding in innovation, skills and infrastructure, it is expected that performance will be significantly improved, and in turn this will help to tackle inequality and deprivation.

The six local authorities (City of Edinburgh, East Lothian, Midlothian, West Lothian, Fife and Scottish Borders) that make up the Edinburgh and South East Scotland City region, together with regional universities, colleges and the private sector signed a City Region Deal with the UK and Scottish Governments with a value of over £1.5 billion in July 2017. The City Region Deal is expected to drive productivity and growth while reducing inequalities and deprivation.

The five themes in the City Region Deal and amount of capital investment are as follows:

- Research, Development and Innovation: £751 million
- Integrated Regional Employment and Skills: £25 million
- Transport: £156 million
- Culture: £45 million
- Housing: £313 million

Through the City Region Deal, the Scottish Government, UK Government and regional partners are working in partnership to deliver change through a series of specific projects including new transport infrastructure such as the Sheriffhall roundabout upgrade, the National Robotarium at Heriot-Watt University campus, major housing projects such as Edinburgh Waterfront and funding for affordable housing.

Regional Prosperity Framework

The Regional Prosperity Framework (RPF), published in September 2021, is the next phase of the development of Edinburgh and South East Scotland's regional economy, building upon the City Region Deal. It is designed to be a single document that helps to shape where public and private investment, including Levelling Up monies, could make the best contribution to drive the region forward in a sustainable and inclusive manner. At the heart of the RPF are three key components aimed at delivering a future society that is resilient, flourishing and innovative. It outlines three priorities:

- reduced economic exclusion

- increased regional competitiveness, and
- accelerate the transition to net zero.

The four priority initiatives set are the following:

- infrastructure for recovery and prosperity
- to develop green regeneration investment prospectus
- to secure a sustainable visitor economy and promote cultural assets, and
- to promote the transition to data driven innovation.

The aspirations outlined in the RPF point towards the growing importance of the green energy transition. An emphasis is put on tourism where it will be sustainable and satisfying the needs of the city, promoting the cultural, artistic and historic assets of the city. The promotion of data-driven technologies may also have effects on other industries with companies focused on research and development, technology, software and data science particularly benefitting.

Nationally and regionally, there is an emphasis on encouraging economic growth in a fair and sustainable way. This is backed up by NPF4 which sets out the need to encourage and promote recovery within the business and industry sector that is sustainable and inclusive.

Local Context

Edinburgh Chamber of Commerce

The Edinburgh Chamber of Commerce in November 2025 published a ‘Call to Action’ to support the City’s economic ambition. It outlines five ‘missions’ to; accelerate business dynamism and ambition, deliver a bold collaborative ‘Team Edinburgh’ leadership, deliver more and better business infrastructure, become Europe’s top mid-sized innovation city, and secure a diverse skilled and resilient workforce.

Edinburgh Economic Strategy 2021

The Edinburgh economy has been navigating a way through changing and uncertain times since the Covid pandemic emerged. The Edinburgh Economic Strategy aligns to and builds on the RPF. The aim of the Strategy is to provide a clear direction for the Council to support the economy through this period of change and set clear priorities for action which will involve collaboration with partners. The Strategy sets out the Council's vision and approach to ensure a stronger, greener and fairer Edinburgh economy.

Its priorities are set out in the form of detailed action plans for each of the following three work programmes:

- Stronger: City’s recovery from pandemic is dependent on businesses adapting and thriving
- Greener: City’s transition to net zero brings jobs and opportunities
- Fairer: Fair work that provides dignity and security.

The Local Development Plan will have a supportive role by delivering the spatial policies and delivering the key land use needs that will enable some of the actions set out in the Strategy to be achieved.

Edinburgh Local Development Plan 2016 and City Plan 2030

Edinburgh is a strong and resilient city, successful in creating jobs and attracting business investment. The strength of the economy is based on a number of key sectors, such as finance, tourism, life sciences and higher education. One of the aims of the adopted City Plan 2030 is to deliver Edinburgh's key economic land use needs, including supporting the city centre, Edinburgh Waterfront, West Edinburgh, the Edinburgh BioQuarter, and delivering land for modern business needs.

As identified in Map 10 Economic Areas, City Plan 2030 continues to identify a number of key economic areas across Edinburgh, defined as: Areas of Economic Importance, Strategic Business Centres, and Business and Industrial areas. These areas are very similar to those as set out in the previous plan, with minor alterations to reflect changes in circumstance. The areas are important for economic purposes, where the Council supports the various employment uses identified and it also allows various suitable policies to be set out supporting their use for employment purposes.

City Plan 2030 Policies Econ 3 Office Development, Econ 4 Business and Industry Areas and Econ 5 Employment Sites and Premises support relevant employment use proposals in appropriate locations and in the case of Econ 4 to protect loss of employment land from inappropriate development. City Plan 2030 also supports mixed use housing development in the place-based policies, which is a key strategy aim, promoting business development alongside housing proposals in suitable locations.

Although the City Plan 2030 has only been adopted since November 2024, many of the policies were carried over from Edinburgh Local Development Plan 2016, albeit some with minor alterations, which allows these policies to be reviewed more easily. There is evidence to suggest that office floorspace in the city centre, as set out below in this topic paper, is being lost to alternative uses such as hotels and commercial letting. Policy Econ 3 Office Development does not prevent loss of office floorspace and Policy Econ 6 Hotel Development supports hotel development in the city centre, which exacerbates the problem.

The main issues report for City Plan 2030 considered the issue of loss of office floorspace, but as a result of the unknown effects of the Covid pandemic on demand for office floorspace at the time, it was decided not include a loss of office floorspace policy, until it was clearer what future office floorspace requirements would be. The issue of protecting office space will need to be explored again for the Proposed Plan given the findings of the Office Paper as part of the Economic Needs Study which is discussed later in the topic paper.

In comparison, City Plan 2030 Policy Econ 4 does protect business and Industry sites from changes of use, and a number of planning applications have been refused on the basis of inappropriate uses on these sites over the years, demonstrating that this policy approach is delivering its objective of protecting industrial sites for these uses. City Plan 2030 Policy Econ 5 conversely supports the change of use of business premises or sites which are not within designated areas, although it seeks retention of business uses on such sites, should it be appropriate in the context of the site. A review will need to be given to this policy approach in light of the evidence set out in the Industrial Paper of the Economic Needs Study.

Policies Econ 1 Supporting Inclusive Growth, Innovation and Culture, Econ 2 Commercial Development and Econ 7 Goods Distribution Hubs were introduced by City Plan 2030 and as a result it is too early to say whether or not they are delivering their objectives. It will be important to continue to monitor planning applications during the preparation of the Proposed Plan to establish if these policies are delivering their expected outcomes.

Economic Needs Study

In 2025, the Council commissioned consultants to prepare an Economic Needs Study. The study comprises a package of seven research reports to comprehensively examine the Edinburgh economy and identify key issues to inform the Evidence Report. These reports form background papers to the Evidence Report itself and can be found as part of the core documents.

The reports cover the following matters:

- Edinburgh Economic Overview
- Industrial
- Offices
- Retail
- Leisure
- Visitor Accommodation
- Summary and Land Use Implications

This topic paper focuses on papers of relevance to this particular topic. The other papers are referred to in Topic 19 City, town, local and commercial centres and Topic 20 Tourism, culture and creativity.

Edinburgh Economic Overview

This Economic Overview paper provides an overview of Edinburgh's overall economic landscape and its various sectors. It also provides an analysis of the strategic policy environment and economic trends likely to affect future demand for employment land in Edinburgh. The paper's conclusions can be summarised as follows:

- Overall, the working age population of Edinburgh is expected to increase between 2024 and 2043, by 32,860. The working population in 2024 was 70%, higher than the Scottish average (69.5%).
- Wages are relatively high in Edinburgh compared to other parts of Scotland and this is likely to continue due to growth in high productive industries.
- Gross value added (GVA) per worker, a measure of labour productivity, is higher than the Scottish average due to a higher share of employment in high productivity sectors such as finance and insurance.
- The tourism sector has grown since 2015 with both increases in employment and businesses, despite a short dip during the pandemic. Investment trends suggest strong future potential.
- The financial sector has consolidated with a decline in business numbers alongside a surge of employment growth since 2015 with large financial firms opening offices in Edinburgh.
- The data sector is likely to be a growth engine for the regional economy, despite a slight decline in employment since 2020. Central to this is the development of five data innovation centres with the purpose of accelerating research and innovation in this sector.
- Digital innovation is driving the creative industries sector, which has grown by 56.5% since 2015.
- Renewable energy is an emerging sector with the potential to become increasingly important to the city e.g. proposals to establish Scotland's first turbine blade factory at the Port of Leith.
- Life sciences and biotechnology is a small but an important and growing sector with growth of employment of 39.1% since 2015, and potential for major growth at Edinburgh BioQuarter.

Business and Industry Paper

The business and industry paper (titled 'Industrial') provides a detailed assessment of Edinburgh's industrial property market. It assesses planning policy, market trends, provides analysis of industrial property stock and market and projects scenarios for industrial property development to meet market needs. The paper's conclusions can be summarised as follows:

- Edinburgh is benefitting from good demand and occupancy levels for industrial property. Despite long run de-industrialisation and a comparatively low per capita industrial stock, the occupier base is broad and includes many activities fundamental to the functioning of the city as well as newer green and digital economy occupiers.
- The city is maintaining stable industrial stock of around 1.1 million sqm. The steady loss of older, obsolete inner-city buildings to alternative use redevelopment is being offset by new industrial units mainly on the accessible western edge of the city. This has not been the case more recently where an estimated 4,394 sqm per annum of new industrial development since 2019

has not kept pace with c. 6,781 sqm lost to alternative uses since 2020. However, over the longer period, since 2010, the gains and losses are more balanced. A notable proportion of the remaining stock is older and more basic quality, at a time when occupier expectations are rising, particularly around energy efficiency.

- The next wave of new development is potentially large but dominated by a large site (64,380 sqm) at Newbridge (former industrial site: Newbridge E). This makes the future pipeline particularly reliant on one scheme with a single owner rather than continuing recent trends of multi-site development at locations which have included Sighthill, Turnhouse and South Gyle in the west of the city and Fort Kinnaird in the east.
- The allocated employment land supply includes sites that have been allocated for mixed use, i.e. West Edinburgh is identified for both employment (area of economic importance) and housing. Therefore, of the total available land supply (292 hectares), there is a total of 92 hectares categorised as marketable land, i.e. sites with planning consent and/or allocated in the LDP, that is suitable for industrial use.
- Long run employment land take up is on average 34,374 sqm (approximately 3.64 hectares) per annum. Take up since 2019 has been slightly lower at an average of 30,000 sqm per annum. Letting dominates the market, with comparatively fewer sales of industrial property. Small lettings (up to 464 sqm) account for more than half of the market confirming the importance of micro and small occupiers, although the largest size range (above 1,858 sqm) accounts for 35% of floorspace take up. West Edinburgh is the most active location, accounting for half of unit take up and three quarters of floorspace take up. Notably, industrial property take up in the city is not particularly aligned with economic cycles and continues to be relatively stable.
- There is a very wide occupier base. Sectors seeking industrial property include construction, technology, manufacturing, engineering, food and drink, arts and culture, motor vehicle sales and repairs, trades, travel, charity, tool hire, storage, logistics, studio space, dog day-care, online trading and leisure.
- Industrial property supply is 58,722 sqm of which approximately half of the availability of floorspace is in West Edinburgh. Almost half comprises small units up to 464 sqm, however, supply of the smallest units (up to 186 sqm) is very low for an active market sector, with only 4 units currently. There is a more plentiful supply of medium sized units (464 sqm to 1858 sqm) including new development. A wide range of property types and sizes from mid 20th century through to new build is available on the market.
- Currently, the vacancy rate is low at 5%. Whilst low in a historic context, it has increased recently due to new build which will take time to become occupied. The low vacancy rate is a result of continuing demand for property but also a result of the steady removal of older industrial buildings and sites.

- Prime rents have increased to £140-£150 per sqm. Higher rents of £150-£190 per sqm may be achievable for premium small to medium sized units. Average rents are lower at £100 per sqm. While the highest rents can support new development and refurbishment, they can also present significant operating cost implications for businesses.
- Edinburgh accounts for 12% of Scotland's industrial property investment market. The market is recovering from the challenges of the 2022-25 inflation and interest rate cycle, however, Edinburgh's industrial market strengths are not necessarily reflected in current deal activity, as landlords focus on holding and managing existing assets rather than trading them.
- Industrial locations also attract demand from complementary employment generating uses that are not class 4, 5 or 6 such as small community or commercial uses. More significantly, they can also attract competition from larger land hungry uses such as storage, energy, and data centres. However, these are less likely in Edinburgh than low cost locations with ample land supply elsewhere. Motor sales are an exception, which often locate on accessible employment sites or estates. Edinburgh has four main clusters at Seafield Road, Sighthill, and the prime locations of Fort Kinnaird and Newbridge. The long-term trend is consolidation into accessible city edge locations and for showrooms to reduce in size due to online sales. The proposed Leith Renewables Hub wind turbine blade factory would be a notable exception to 'land hungry' uses locating outside the Edinburgh council area.
- Edinburgh's industrial stock should benefit from the general expansion associated with the very positive forecast growth of the city's population and economy. Two scenarios are presented:

    - **Business as usual scenario:** Edinburgh would continue to see loss of obsolete inner-city stock with the city's supply of industrial space replenished with the development of new stock on the periphery and within existing estates. Whilst the overall stock may not change much in quantitative terms, it should steadily improve in quality, although some would continue to locate outside the city because of a lack of stock that meets their needs. Assuming an even split between new development and refurbishment, it would require 9,135 sqm per annum, around double the current rate, and the serviced land requirement would be 3 hectares per annum.
    - **Growth scenario:** In addition to growth under the business as usual scenario, Edinburgh would retain more of its industrial market through urban growth and/or less dispersal of market activity to the wider region by offering more sites and premises. Assuming a 1% (11,000 sqm) physical stock expansion per year would take the development rate to 20,000 sqm per annum. This would expand the stock by 200,000 sqm

to 1.2 million sqm. The serviced land requirement would be 6.67 hectares per annum.

- The employment land requirements of both scenarios could be delivered across the following: Newbridge E, the remaining marketable allocated industrial sites, potential further regeneration of obsolete employment sites in existing estates, land brought forward (for example through site servicing) from the constrained allocated supply; and potentially, selective relaxation of uses classes on the city's large volume of Class 4 business land.

Office Paper

The office paper provides a detailed assessment of Edinburgh's office market. It also provides an analysis of the strategic policy environment and economic trends likely to affect future demand for office floorspace in Edinburgh. The paper's conclusions can be summarised as follows:

- As a leading UK office centre, the city has benefited from long run employment and market growth. The office market has evolved from period buildings in the New Town up to the 1980s, to purpose built open plan office in the Exchange District after the financial deregulation of 1986, to West Edinburgh following planning changes in 1989, then a focus on Leith and satellite locations around the traditional core city centre such as Fountainbridge and Quartermile as the market continued to expand into the 2000s.
- Since the Covid pandemic widespread adoption of hybrid working has loosened the relationship between white collar jobs and demand for floorspace. While office occupancy is gradually increasing, it remains far below pre-pandemic levels. The typical occupier seeks less but better-quality space, although this varies depending on the occupier. Edinburgh's major occupiers are well advanced with restructuring their office floorspace, while small and medium enterprises (SME) are typically moving to smaller offices to work in more flexible ways, including co-working locations.
- The stock of offices has contracted by 2% since 2018 to 1.82 million sqm, as the quantum of existing buildings that have been demolished and lost to alternative uses has exceeded new development. This shrinking of stock alongside rising employment is consistent with the emerging effects of hybrid working. In terms of location: 49% of the office floorspace is in the city centre, 18% in the west, 5% in the Waterfront, 1% in the south east, and 27% elsewhere in the urban area.
- Stock losses take three forms: period buildings converting to residential, older offices (purpose built) in outlying locations being redeveloped, and alternative use of city centre blocks (a recent trend). Residential development and hotels are the most common alternative uses of vacant offices. Further office stock (15,200 sqm) is under threat from alternative uses, while major office

buildings are proposed for conversion or part demolition on Dalkeith Road, Conference Square, Morrison Street, St Andrew Square, London Road and Pentland Gait Business Park.

- New office completions since 2018 total 85,250 sqm of which 77% is at Haymarket Square. However, increased development costs and uncertainty brought on by hybrid working are now hindering the delivery of the development pipeline. 57,700 sqm is planned, all in the city centre, principally in three large proposals. But presently none are under construction or due to commence.
- A large amount of vacated stock (38,000 sqm) continues to be refurbished and re-presented to the market to meet modern needs, which along with demolitions and conversions is improving the stock quality. 37% of stock is now rated 4 or 5 stars, compared to 13% in 2018. There are currently four major planned refurbishment projects, two of them in the city centre, totalling 38,000 sqm.
- Demand for office floorspace by decade peaked in the 2000s at 80,000 sqm and has since dropped to 55,700 sqm. Around 80% of transactions are for offices of 465 sqm (5,000 sq ft) or smaller. Demand for fitted out, flexible and serviced office space continues. The city centre accounts for 74% of take up since 2019, while West Edinburgh delivered 17%, Leith 4% and other locations 5%. The city centre attracts over half of the city's demand but only has 58% of the stock.
- Prime city centre rents have increased to £45.50 per sq ft. However, the market view is that £50 per sq ft is required to stimulate new development.
- The city-wide vacancy rate is 11% and has increased in all areas except the south-east and 'elsewhere'.
- Office investment has faced twin challenges: uncertain demand caused by hybrid working, and the 2022-25 inflation/interest rate cycle which has depressed values. However, the market has benefited from tight supply and good demand, delivering a third of Scotland's office investment deals by number and half by value. Investor demand favours major occupiers in prime locations and private ownership is common in SMEs and the second-hand market.
- The principal outcome of these trends is a continuing shortage of grade A office space in the city centre, despite it being a focal point for demand and sharp rises in rent. In contrast, the out-of-town market has reduced demand and vacant buildings leading to oversupply and limited prospects for private sector investment due to low demand and poor rent growth.
- Edinburgh has a number of specialist office market locations in research and innovation, creative industries and technology incubation sectors. Direct interaction with the office market only tends to happen when an occupier is expanding, but most of the expansion tends to be internal to a particular campus. These sectors are flagged for potential growth.

- Office development scenarios have been derived from employment forecasts and market trends:
    - Low scenario requires annually 7,500 sqm of new office development, and 7,500 sqm of fully refurbished existing office space.
    - High scenario requires annually 15,000 sqm of new office development.

  Such development rates are not inconsistent with the long run rate of 23,500 sqm per annum, which includes later phases of Edinburgh Park, westwards expansion of the Exchange District, and, most recently, Haymarket Square.

- The scenario assumption is 80% city centre and 20% peripheral locations. This could compound a significant need in the city centre, for example, 4 years high scenario demand could require c. 48,000 sqm.
- Straight line projections are less reliable than in the past and new development is unlikely to arrive that way. Viability is currently challenging and the most likely situation is that future pent-up demand will stimulate new development at certain points. Each of the three large consented office buildings at Haymarket and Fountainbridge could deliver one year's worth of office development in line with the high scenario.
- Gradual loss of office stock is expected to continue. The established rate of loss of 20,000 sqm per annum is higher than the scenario development rates.

Summary and Land Use Implications Paper

The summary and land use implications paper summarises the findings of all the study papers and considers their land use implications for City Plan 2040. The paper's conclusions of relevance to this topic paper are as follows:

- Edinburgh is a continually growing city with limited land available to accommodate development of the land uses set out in the suite of reports (offices, industrial property, retailing, leisure and visitor accommodation).
- Visitor accommodation shows strong growth potential. Industrial property also has substantial requirements, although some of that is replacement rather than additional floorspace. The office market also requires new development, but retail requirements are expected to be more selective and leisure requirements are more focused on re-investment.
- The office, retail, visitor accommodation and leisure sectors show a strong market preference for the city centre. This means that the uses can be in competition with each other for sites and sometimes buildings. Residential uses may also compete for city centre and edge of centre development opportunities. The value of a site will vary depending on the type of use, and generally the market will seek to deliver a site for its highest financial value. The evidence shows that the market is favouring uses such as hotels and purpose-built student accommodation over office development, despite the

fact there is demand for additional office floorspace in the city centre, which has implications for the Proposed Plan, and how it can be addressed.

Review of Economic Indicators

The following tables provide information on employment in Edinburgh based on the most recent data available, as set out in the Economic Overview paper. Data prior to 2015 produced by the Office of National Statistics (ONS) has not been included as the methodology for calculation changed in 2015 and therefore would not be comparable.

In terms of the key highlights, the number of economically active people living in Edinburgh is 85.1%, which is higher than the figure for Scotland and indicates a healthy labour market which is much more competitive. Unemployment is lower than the national average at just 2.6% and wages are higher compared to other workers in Scotland. In terms of occupational categories, Edinburgh has a significantly higher proportion of employees working in the finance and insurance sector, accommodation and food, and education sectors that the national average. It also has a higher proportion of employees in the property sector, reflecting the fact that this is a key sector of the Edinburgh economy, both in terms of directly and indirectly supporting jobs. It should be noted that there has been a 5.4% increase in employment in the creative sector (arts, entertainment etc) with an increase in both employment and business counts. This reflects the city's key role as a major tourist and cultural heritage destination, for example with the annual Edinburgh Festival and Fringe. As set out in the Economic Overview paper of the Economic Needs Study, key economic sectors, including tourism and the creative industries are expected to drive future economic growth and demand for employment in Edinburgh. Unsurprisingly, Edinburgh has lower levels of employment in the primary sectors (mining and agriculture/forestry/fishing), reflecting the fact that it is a mostly urban authority.

Edinburgh has a notably higher concentration of individuals in managerial and professional roles compared to the national average and the higher concentration of these types of professions could be expected to support a relatively higher demand for office based business space. In terms of productivity, in 2022 the gross value added (GVA) per hour worked in Edinburgh was £49, or £75,000 per filled job. This was higher than the Scottish rate of £39, or £59,000 per filled job. Edinburgh's productivity is driven by commercial sectors with a strong local presence and higher than average GVA per hour worked compared to the Scottish rate. These sectors include finance, public administration and defence, and information and communication.

In terms of employment, the total number of jobs in Edinburgh increased by 14.8% between 2015 and 2023 with the largest increase being in the city centre.

	Edinburgh		Scotland	
Population aged 16-64	363,787	100%	3,479,044	100%
Of which economically active	309,583	85.1%	2,710,175	77.9%
Of which employed	301,216	82.8%	2,616,241	75.2%
Of which unemployed	9,458	2.6%	118,287	3.4%
Of which economically inactive	54,204	14.9%	768,869	22.1%
Median Annual Gross Wage (all workers)	£32,240		£29,842	

Figure 18.1: Economic activity and inactivity

Sector	**Edinburgh**		**Scotland**	
Health	56,000	15.1%	414,000	15.6%
Finance & insurance	42,000	11.3%	84,000	3.2%
Accommodation & food services	38,000	10.3%	229,000	8.6%
Education	36,000	9.7%	217,000	8.2%
Professional, scientific & technical	34,000	9.2%	190,000	7.2%
Retail	26,000	7.0%	230,000	8.7%
Business administration & support services	23,000	6.2%	181,000	6.8%
Public administration and defence	23,000	6.2%	164,000	6.2%
Information & communication	20,000	5.4%	82,000	3.1%
Arts, entertainment, recreation & other services	20,000	5.4%	117,000	4.4%
Transport & storage	12,000	3.2%	119,000	4.5%
Manufacturing	10,000	2.7%	178,000	6.7%
Construction	9,000	2.4%	136,000	5.1%
Property	7,000	1.9%	39,000	1.5%
Wholesale	5,000	1.4%	75,000	2.8%
Mining, quarrying & utilities	4,000	1.1%	66,000	2.5%
Motor trades	4,000	1.1%	45,000	1.7%
Agriculture, forestry & fishing	1,250	0.3%	91,000	3.4%

Figure 18.2: Employment by occupation sector

Figure 18.3: Total number of employee jobs in Edinburgh by area

Occupation	Edinburgh		Scotland	
Managers, directors and senior officials	35,000	12%	227,000	9%
Professional occupations	104,000	35%	678,000	25%
Associate professional & technical	56,000	19%	399,000	15%
Administrative and secretarial	15,000	5%	260,000	10%
Skilled trades	15,000	5%	259,000	10%
Caring, leisure & other services	26,000	9%	258,000	10%
Sales and customer service	14,000	5%	167,000	6%
Process, plan and machine operations	7,000	2%	156,000	6%
Elementary occupations	26,000	9%	251,000	9%

Figure 18.4: Employee jobs occupation

Recent Trends

As the Economic Overview paper sets out, a key trend in the city is the consolidation of high productivity sectors, demonstrated by large increases in total employment alongside decreases in business counts. This has been primarily driven by large decreases in the number of micro businesses. The most significant beneficiaries of this trend include the financial and insurance, information and communication, and professional, scientific and technical sectors.

Other sectors in the city demonstrate robust growth in both employment and business counts. The key sectors being education, health, and accommodation and

food services. Two sectors were notable as they exhibited trends of decline; wholesale and retail. Employment in these sectors declined as did the whole business count.

These trends highlighted three distinct economic dynamics. Some sectors have consolidated, and for these sectors it is reasonable to expect a shift in demand for business space towards larger premises. Other sectors have experienced growth or decline in both employment and business counts. The implication of this is that demand for business space for businesses operating in the sectors of growth is likely to increase demand and conversely for those in declining sectors demand is likely to fall.

In terms of the economy, the five sectors adding the most jobs from 2015 to 2023 collectively accounted for 30,000 or 67% of all jobs created since 2015. Wholesale and retail stand out as the only two sectors that have both decreased in employment and business counts. This sector, which is covered in Topic 19 City, town, local and commercial centres**,** has been going through a prolonged downturn over the past decade as a result of the following factors:

- 2008 financial crisis
- Growth of online retail
- Covid pandemic, and
- Inflation.

Across Great Britain as a whole, 71% of those in professional occupations reported either working from home or hybrid working, the highest out of all the sectors. Managers, directors and senior officials also reported a high degree of working from home or hybrid working, with 63% reported to be engaged in both.

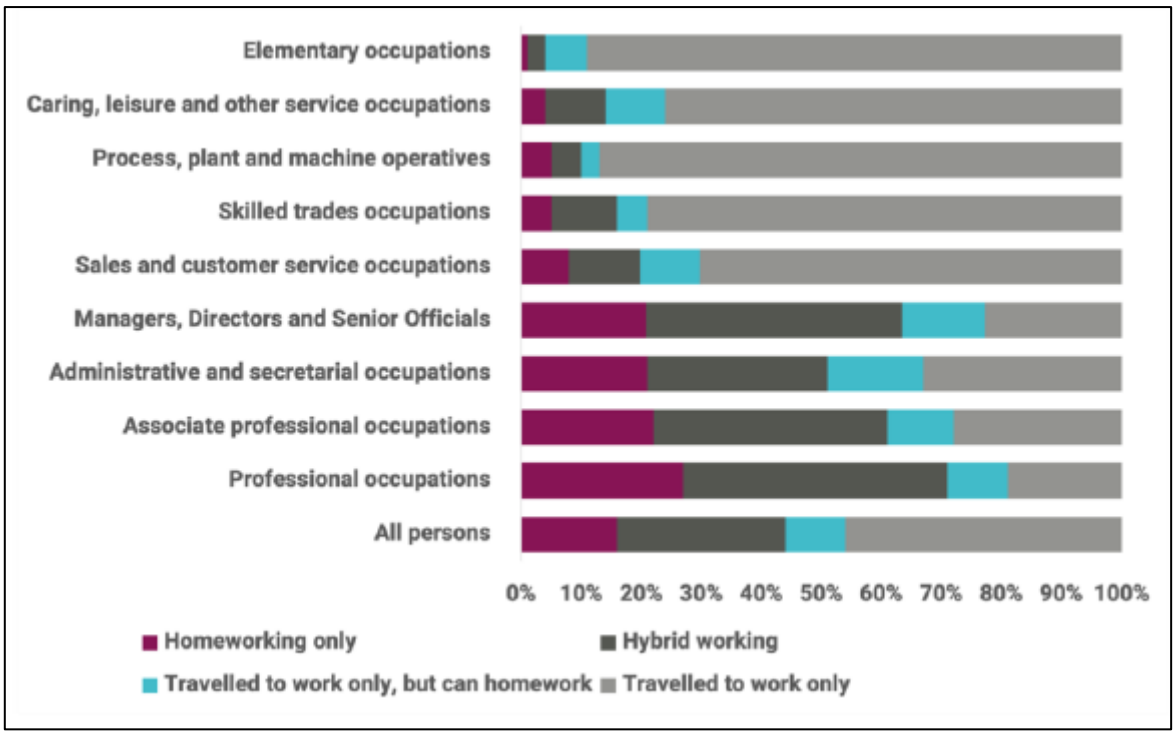


Figure 18.5: Homeworking by occupation (source: Economic overview paper)

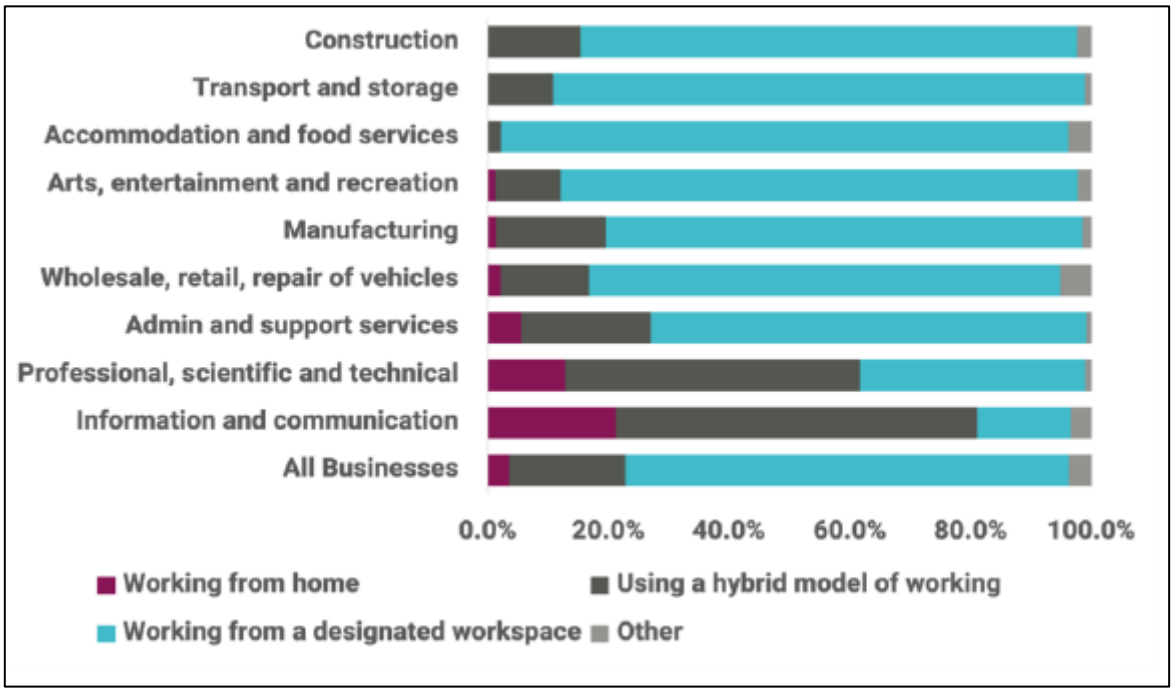


Figure 18.6: Homeworking by sector (source: Economic overview paper)

Edinburgh currently has a reasonably high concentration of employment in sectors and occupational types that tend to exhibit higher levels of homeworking. It is therefore reasonable to expect that a relatively high proportion of the city's workforce will either work from home or engage in hybrid working practices. If this continues, it would imply less pressure on demand for office spaces. However, demand for office spaces is complex and is affected by a number of factors, as is set out elsewhere in

this topic paper. Nevertheless, the planning implications of homeworking need to be considered in the context of preparing the Proposed Plan.

Implications of Socio-Economic Context

The most recent projections show that the population of Edinburgh will grow in the coming years. Compared to Scotland as a whole, Edinburgh has a higher proportion of working aged people. Access to an adequate labour supply is important for any business so, these trends, could strengthen future demand for business space.

The qualifications profile of the Edinburgh workforce, as shown in the Economic Overview paper is skewed toward higher levels of qualifications, and this is reflected in a higher concentration of professional and managerial occupations. This could have implications for the types of business space required in the future, with office floorspace likely to be relatively more important but this demand could be moderated by the relatively high level of home working.

The levels of productivity and labour market indicators also point towards a labour market which has healthy levels of employment concentrated in more productive sectors of the economy such as financial services, professional and technology.

Assessment of Current Business and Industrial Land Supply

Having reviewed the overall economic data, it is important to look more specifically at the business and industrial land supply as required by NPF4.

Industrial Sector

Scotland's industrial property market is performing well. Occupancy rates are high and good quality properties in established market locations are sought-after. Economic changes favouring the industrial market include modernisation, online shopping and shorter supply chains. Despite this occupier demand, new industrial development has slowed due to higher costs and weaker investment, at a time when more occupiers are demanding energy efficient, modern premises and the existing stock is beginning to age.

The industrial sector has a smaller employment role in Edinburgh compared to the service sector, the latter associated with a strong demand for office floorspace sector. However, it made up of a broad range of businesses and those businesses associated with green technology, biotechnology and innovation are particularly important and are expected to grow over the next ten years. In addition, it is a sector which is covered by a range of planning policies as set out in City Plan 2030 and policy in NPF4 as referred to above. Therefore, it was important to commission a study to assess this sector to identify any implications for the preparation of the Proposed Plan and as a result a number of fundamental issues have been identified.

Firstly, the evidence set out in the Economic Overview paper identified that employment in Edinburgh grew substantially between 2015 and 2023 adding 44,800 jobs. The working age population is predicted to increase by 32,680 between 2024

and 2043. The city's employment base is concentrated in services. Therefore, there is a corresponding smaller share of employment in traditional industrial uses such as manufacturing, construction, transportation and storage which together account for 8.3% of the city's employment compared with 16.3% for Scotland as a whole. However, Edinburgh's jobs and businesses in these sectors have increased since 2015 and estimates using industrial subsectors suggests there are 30,000 such jobs in Edinburgh.

The evidence set out in the Business and Industry paper shows Scotland and Edinburgh are benefiting from good demand and occupancy rates for industrial property. Despite long run de-industrialisation and the loss of older factories, economic trends support a broad industrial occupier base in Edinburgh including many activities fundamental to the functioning of the growing city as well as newer green and digital economy businesses.

The city is maintaining stable industrial property stock (c. 1.1 million sqm) around a steady process of losing older obsolete inner-city buildings and gaining new industrial units suited to modern occupier needs, mainly on the accessible western edge of the city. The next wave of industrial development is potentially large, but it is dominated by a large site at Newbridge in contrast with the multi-site delivery of new space in recent years which gives rise to risks around delivery. Despite this balance in the stock, the historic loss of industrial buildings means that Edinburgh has less industrial floorspace per capita than neighbouring authorities or Scotland as a whole. In addition, much of the stock is now older and of a basic quality, at a time when occupier expectations are rising, particularly for energy efficiency. This demand, and associated rents is supporting refurbishment of some of the prime stock.

The city's spare employment land supply (Table 4 below) to accommodate future industrial development seems extensive with 19 sites totalling 221.47 hectares of which 14 sites totalling 90.38 hectares is marketable land as shown in the maps below (Figures 4 and 5). However, only four of the marketable sites are suitable for industrial uses, with constraints to overcome: Newbridge A and B (total 22.7 ha), Turnhouse Road 39 (0.4 ha), and Gilmerton Station Road (1.3 ha), giving a total of 24.4 hectares. The majority of employment land is office/business rather than industrial or restricted to science park use. The remaining constrained sites with potential to accommodate industrial development consist of: Newbridge D (48.3 ha), Newbridge E (20.2 ha), Niddrie Junction (7 ha), and Leith Docks (20.6 ha), giving a total of 96.1 ha of additional land supply. Therefore, the total available industrial land supply is 120.5 ha. However, 76% of this supply with potential to accommodate industrial development is in West Edinburgh. Although this represents a significant proportion, it is important to recognise that West Edinburgh is the principal area of demand for industrial space and is a particularly accessible location for businesses with convenient access to the transport network in the central belt of Scotland. However, it is also reliant on the continued delivery of key sites at Newbridge,

particularly site Newbridge E, which was granted planning permission in November 2023, and site D, which is an allocation without planning permission at present.

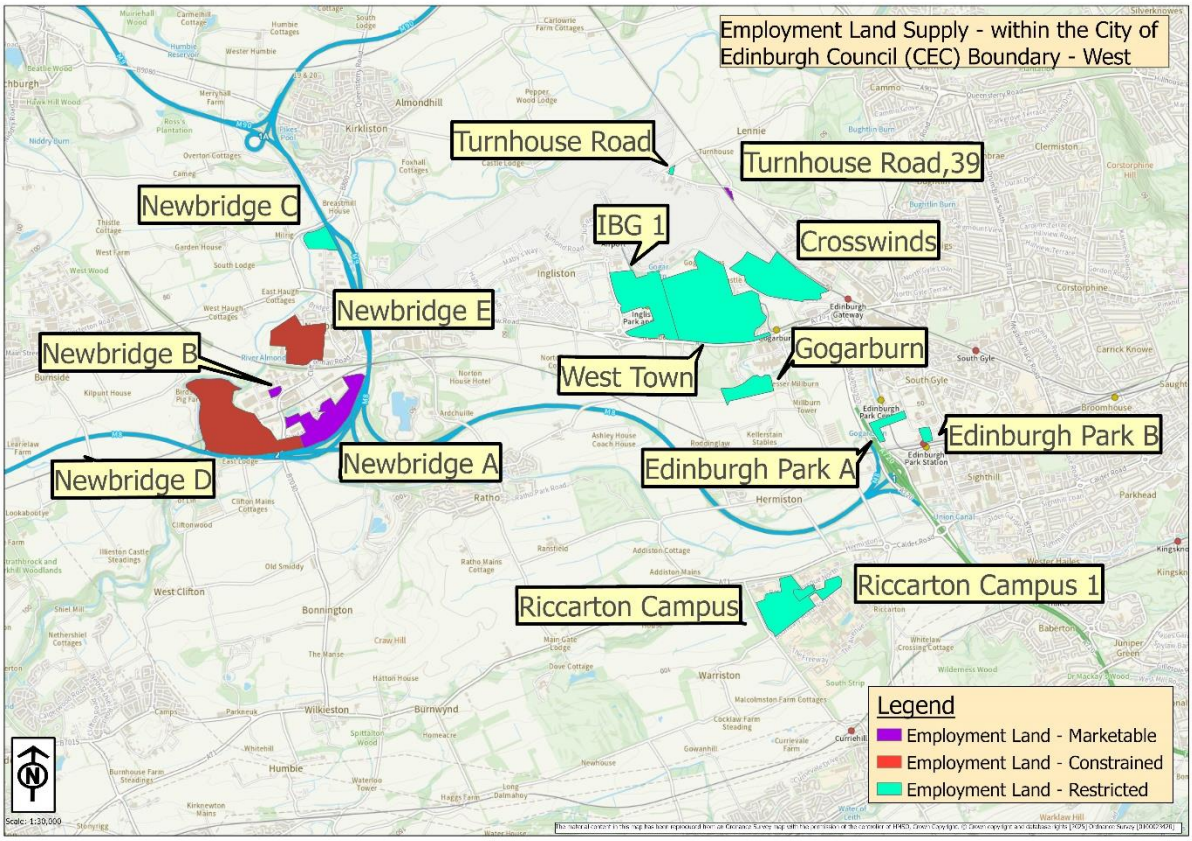


Figure 18.7: Map of employment land supply in West Edinburgh

Ref	Site Name	Use	Category	Area
1	Turnhouse Road,39	4,5,6	1	0.4ha
2	Turnhouse Road	4	1	0.4ha
3	Gilmerton Station Road	4,5,6	1	1.3ha
4	Riccarton Campus	4	1	22.6ha
5	Riccarton Campus 1	4	1	1.9ha
6	BioQuarter A	4	1	21.2ha
7	Newbridge A	4,5,6	1	21.7ha
8	Newbridge C	4	1	5.8ha
9	Gogarburn	4	1	8.5ha
10	Fountainbridge	4	1	0.18ha
11	Newbridge B	4,5,6	1	1
12	Edinburgh Park B	4	1	1.3ha
13	Edinburgh Park A	4	1	4.1ha
14	BioQuarter B	4	2	13.7ha
15	Newbridge D	4,5,6	3	48.3ha
16	Niddrie Junction	4,5,6	3	7ha
17	IBG 1	4	3	21.29ha
18	Leith Docks	4,5,6,	3	20.6ha

19	Newbridge E	4,5,6	2	20.2ha
Total Category 1				**90.38ha**
Total Category 2				**33.9ha**
Total Category 3				**97.19ha**
Total employment land supply				**221.47ha**

Figure 18.8: Table of employment land supply (note: Category 1 (marketable), Category 2 (requires servicing), Category 3 (potential land))

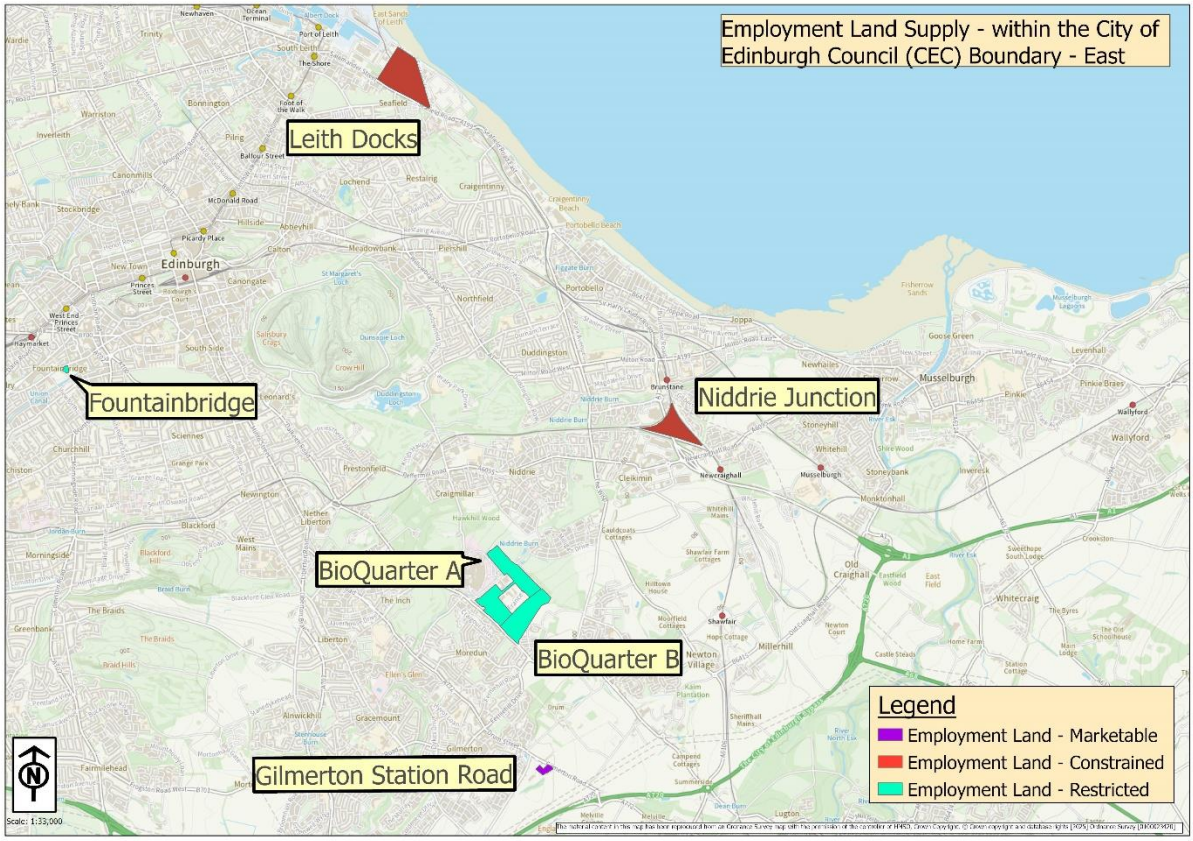


Figure 18.9: Map of employment land supply in East Edinburgh

It should be noted that the majority of the International Business Gateway (IBG) now forms part of the West Town development in West Edinburgh allocated for 7,000 houses. Although approximately 21.3 ha is identified for employment purposes, it is unlikely that the remaining land will be suitable for industrial development and it is more likely to be used for class 4 business. As a result, the IBG should not be considered part of the available industrial land supply.

Long term take up of employment land is 3.64 hectares per annum, although it has been lower in recent years. Long run take up of industrial property in Edinburgh has averaged 343,000 sqm of floorspace in 52 units per year. Take up in the medium term, since 2019, has dropped and is 12-13% lower than this. Lettings dominate the market, and lettings for small properties, up to 464 sqm (5,000 sq ft) account for

more than half of all deals. However, while 68 industrial units are currently available on the market (as of June 2025), supply of small units, up to 186 sqm (2,000 sq ft), is very low in relation to demand with only four units currently available, demonstrating a structural shortage of small-scale spaces.

Vacancy levels for industrial floorspace are currently 5%. While this is a low vacancy rate, it has increased recently due to new-build industrial development which will take time to become occupied. The vacancy rate hit a peak at 9.9% during the aftermath of the 2008 financial crisis before falling to sit at an exceptionally low 1.9% in 2023. This is not just because of continuing demand for industrial property, but also the steady removal of older buildings and sites from the city.

With regard to small units, consent has been granted at Gilmerton Station Road for some new business units, including 19 units of 100 sqm, one unit of 200 sqm and one of 300 sqm. Consent has also been granted for new units at Turnhouse Road 39, which will provide 15 units of approximately 93 sqm. Thirdly, consent has been granted for 27 new units near Castlebrae Business Centre in sizes of 93 to 200 sqm. If these 63 units are delivered they would help to significantly improve the availability of smaller industrial units and would almost double the total number of available units. They would also help to reduce the dominance of units in West Edinburgh.

It is also worth noting that consent has been granted (19/00748/PPP) by Midlothian Council for a new 8 ha business and industrial estate at Shawfair, adjacent to the Council's boundary just south of the Newcraighall Industrial Estate and Commercial Centre. The site is currently being marketed for class 4, 5, 6 uses, and sui generis (home improvement warehouse, builder's merchant and car showroom). Although the site is outwith Edinburgh, it is conveniently located for Edinburgh's businesses. It will provide additional floorspace over and above that provided in Edinburgh and would support Edinburgh's businesses seeking to relocate to newer premises, whilst discouraging more widespread dispersal.

Regarding aquaculture, the Business and Industry paper of the Economic Needs Study states that in Edinburgh, this important sector is primarily concentrated on research and supporting administrative functions. As a result, any requirements are likely to be met by class 4 office space. Major aquaculture facilities tend to be located in Scotland on the west coast and the islands and are not associated with a largely urban area such as Edinburgh.

Scotland and Edinburgh benefit from good demand and occupancy rates for industrial property. Despite long run de-industrialisation and the loss of older factories, economic trends support a broad industrial occupier base which in Edinburgh supports many activities fundamental to the functioning of the growing city.

The Business and Industry paper sets out two scenarios for future industrial requirements over the lifetime of the City Plan 2040: core or growth.

Core

The core scenario or underlying assumption is of a continuation of the status quo with Edinburgh reusing some of its industrial stock alongside the steady loss of older, obsolete inner urban assets. This is a policy position currently supported by the strategy of City Plan 2030 including through housing proposals sites on such sites and Policy Econ 5. This scenario also includes the delivery of new development on accessible peripheral sites, and some loss of businesses to other council areas.

Under this continuation of the status quo scenario or business as usual, the overall quantity of industrial stock would not change much but it should steadily become more efficient for occupiers in terms of location, energy efficiency, layouts, amenities, processes and volumes. This scenario, based on trends over the last 60 years, envisages an annual requirement to renew 18,270 sqm of industrial floorspace per annum, with the assumption that half of this figure would be new floorspace and half would be refurbished existing floorspace. Over the ten years, that would result in 91,350 sqm of new floorspace. The related serviced land requirement would be 3 hectares per annum or 30 hectares over the period of the City Plan 2040 which is consistent with past rates. The paper points out that current rates are about half this based on activity between 2010-25, which suggests that a significant proportion of the older stock is continuing from year to year in a basic and declining state.

Growth

Under the ‘growth scenario’, Edinburgh would retain more of its industrial market through urban growth and/or less dispersal of businesses to other council areas by offering more new sites and premises. This is in addition to the growth within an improving stock in the ‘business as usual’ scenario. This scenario assumes a 1% per annum growth in the industrial stock, resulting in a 11,000 sqm of new floorspace raising the annual rate to 20,000 sqm. This is around four times the current rate of new development. Over ten years, the industrial stock would expand to c.200,000 sqm. The related serviced land requirement would be 6.67 hectares per annum or 66.7 hectares over the period of the City Plan 2040.

As stated above, the total available industrial land supply is 120.5 ha, which in theory is enough land to accommodate the growth scenario. However, the land supply is not distributed evenly across the city with a large proportion of the existing supply in the west.

During the preparation of the Proposed Plan, there is a need to consider how best to support this growth as part of the overall spatial strategy, balancing a range of needs for Edinburgh’s growing population and economy including housing and transport. This could include consideration as to whether there is a need to better distribute the industrial land supply across the city or if the current concentration is appropriate to enable different land uses elsewhere in the city.

Office Sector

The office sector is a key component of the business and employment land supply in Edinburgh. It is also a sector which is covered by specific planning policy as set out in the adopted local development plan as referred to above. Therefore, it was important to consider it as key part of the Economic Needs Study to identify any implications for the preparation of the Proposed Plan. As a result a number of fundamental issues have been identified.

Firstly, the evidence set out in the Economic Overview paper anticipates robust growth in employment and business count in key sectors of the economy, for example finance, that generate demand for office floorspace, particularly in the city centre. In addition, Edinburgh also has a reasonably high concentration of employment in sectors and occupational types that tend to demonstrate high levels of home and hybrid working. As a result, there is an expectation that working from home and hybrid working, will continue to have an influence on demand for office floorspace.

The detailed effects of these issues are examined more closely in the Office paper of the Economic Needs Study. However, the evidence presented shows that since the Covid pandemic, hybrid working has affected the relationship between office jobs and floorspace, and while office occupancy is gradually increasing it remains well below pre-pandemic levels, with occupiers generally seeking less floorspace but of better quality.

There is also evidence that despite a growth in demand for office floorspace that the overall quantum of floorspace is contracting, which is consistent with the emerging effects of hybrid working. The contraction of floorspace is a result of old office stock being demolished and replaced with alternative uses, most commonly residential development and hotel development, for which there is a demonstrable need. However, short term let/serviced apartments and purpose-built student accommodation are other uses regularly replacing office stock.

The evidence also shows that the largest proportion of office floorspace is in the city centre, which is subject to greatest demand, and thus, highest rent levels. There is also evidence of refurbishment taking place, significantly improving the quality of the floorspace overall, and as a result 37% of stock is now high quality compared to 13% in 2018, a notable improvement. Conversely, demand for office floorspace elsewhere, particularly West Edinburgh (e.g. Edinburgh Park), is muted with a significant oversupply of space with low take up. Some of the reasons for this are shared with the city centre in terms of the age of the stock and cost of refurbishment. But in the out-of-town market these are coupled with low demand and poor rental growth making investment in refurbishment or replacement unattractive.

Strong demand and a tight supply in the city centre has pushed up average rents on office space to £45.50 per sq ft, (£489.76 sqm) however, the market view is that a

minimum of £50 per sq ft (£538.20 sqm) is required to stimulate new development. There are a number of major office developments in the pipeline in the city centre that have stalled, because developers are unwilling to commit to commencing construction until a property is at least partially pre-let. This is due to increased development costs and market uncertainty. In some respects, there is market failure, i.e. strong demand for office development should support the delivery of additional supply but is failing to do so.

The office report sets out a number of projections for office floorspace requirements based on employment forecasts and market trends. Under the low scenario, a further 75,000 sqm of additional floorspace would be required over the ten-year period of the Plan, and 150,000 sqm under the high scenario. The assumption being that 80% of the new stock would be in the city centre. The gradual loss of stock is expected to continue and this compounds the issue.

Specialist sectors (research and innovation, creative industries and technology incubation) are also flagged for potential growth.

In preparing the Proposed Plan and its office policy strategy, the Council will have to consider the projected need for additional office floorspace especially in the city centre, the implications of the loss of office floorspace to other uses, the strong demand for quality floorspace in the city centre, and the market's difficulties in delivering additional floorspace supply. It will also have to consider the oversupply of floorspace in other parts of the city and corresponding lack of demand and whether there is a need to revise policy to address this, for example, in West Edinburgh.

Economic Needs Study – Summary and Land Use Implications

The office, retail, visitor accommodation and leisure sectors show a strong market preference for locating development proposals within the city centre. This means that the uses are in competition with each other for a limited number of development sites, when they become available. The value of a site varies significantly depending on the type of proposed use, and generally developers will seek to deliver a site for its highest financial value. At the present time this tends to be for uses such as hotels, purpose-built student accommodation and serviced apartments over office development, despite the fact there is demand for additional office floorspace in the city centre. When preparing the Proposed Plan, the Council will have to consider if there is a need to prepare locally specific planning policy to favour certain uses over others in particular areas such as the city centre.

Poverty, Disadvantage and Inequality

Although Edinburgh is an affluent city, there are concentrated pockets of deprivation across the city. Further details of this are set out in the Place Profiles and in Topic 15 Health and wellbeing. The map**,** below, shows the areas listed as most deprived in the indices of multiple deprivation. The employment sites at Gilmerton Station Road, Leith Docks and Niddrie Junction are reasonably close to the areas of worst

deprivation. In addition, the majority of the industrial land supply to the west of the city, is also an area that is deprived, albeit not in the same decile as Craigmillar or Gilmerton. During the preparation of the Proposed Plan, the Council will consider if it is feasible or necessary to create a better distribution of industrial sites including for small local businesses and start ups to generate community wealth, taking into account proximity to areas of higher deprivation and public transport access.

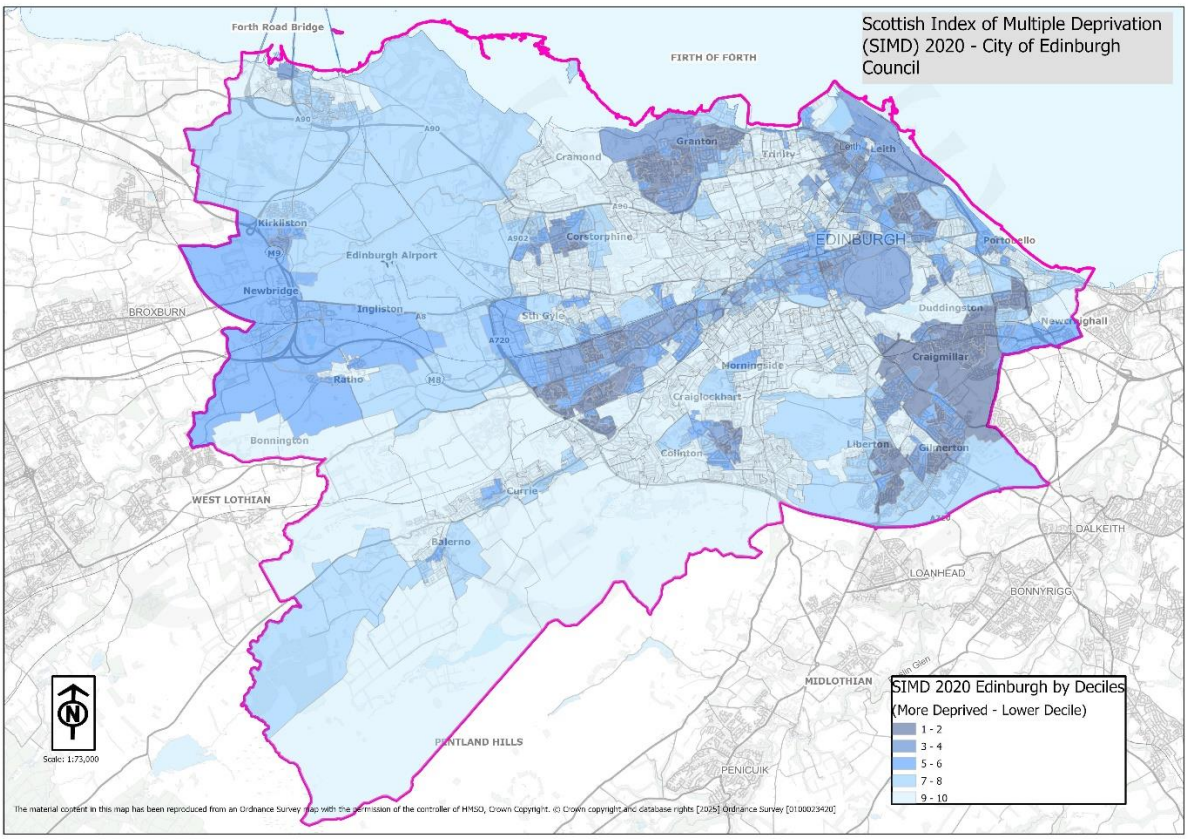


Figure 18.10: Scottish Index of Multiple Deprivation 2020 Edinburgh

Summary of stakeholder engagement

Key Agency	**Scottish Enterprise**
Main views raised	**Scoping (May 2025):** Note to examine market evidence on employment land demand and supply. **Final Topic Papers (March 2026):** Thank the Council for taking cognisance of Scottish Enterprise's previous comments.
Council response and Implications for the proposed plan	The Council commissioned consultants to prepare an Economic Needs Study, which addresses this matter, the results of which are included within this topic paper. The Council has also considered the implications of this evidence for the Proposed Plan.

Is the agency content with the evidence?	Scottish Enterprise have advised that: (they) 'can confirm that Scottish Enterprise considers that the Evidence Report is sufficient in respect to NPF4 Policy 26 and that Scottish Enterprise has no issues of dispute.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	As set above, the Council will take into account the implications of the Economic Needs Study when preparing the Proposed Plan.

Key Stakeholder	**Homes for Scotland**
Main views raised	**Final Topic Papers (March 2026):** The topic paper does not cover the social and economic benefits of housing building. It is important to recognise the success of an economic strategy relies on a range and choice of homes and tenures to support existing employees and attract investment to Edinburgh. Additionally, the construction process itself adds to local employment and supports the local economy. The socio-economic benefits of home building cannot be understated. House builders contribute millions to infrastructure investment across the district and their role as a principal funder of future investments must be fully recognises, as should their role in the journey to net zero through energy efficient homes and local living neighbourhoods. In 2019 the home building sector supported 79,200 jobs.
Council response and Implications for the proposed plan	The important role of the property and construction sectors is recognised in the Economic Needs Study – Edinburgh Economic Overview and Table 2: Employment by Occupation Sector, has been included within the Topic Paper. However, additional text has been added to the Review of Economic Indicators to draw attention to the role of housing building (property) in the economy.
Is the agency content with the evidence?	HfS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	There are no outstanding issues.

Outstanding issues	None
Actions for proposed plan stage	The Council will continue to work with stakeholders including HfS in preparing the Proposed Plan.

Other Engagement and Comment

Edinburgh Napier University responded to the draft topic paper engagement and suggested that the Council makes reference to the UK Modern Industrial Strategy and the accompanying eight sector plans. They also suggested the Council makes reference to the Edinburgh Chamber of Commerce's 2030 Vision.

The Council has included references to the suggested documents.

Economic Needs Study - Offices

As part of the process of preparing the Economic Needs Study Offices Report engagement with a number of stakeholders with interest in the office sector was undertaken, including:

- City of Edinburgh Council: Development and Regeneration, Estates, City Region Deal/City Vision
- Scottish Enterprise
- Scottish Futures Trust
- Essential Edinburgh
- Edinburgh Chamber of Commerce
- Ryden (commercial property agent)
- Federation of Small Businesses
- Ardstone
- GSS Developments
- Baillie Gifford
- Out of the Blue Arts and Education Trust

Details of the comments are set out in the study report and taken into account in the preparation of the report's analysis, summary and conclusions.

Economic Needs Study – Industrial

As part of the process of preparing the Economic Needs Study Industrial Report engagement with a number of stakeholders with interest in the industrial sector, including:

- City of Edinburgh Council: Development and Regeneration, Estates, City Region Deal/City Vision
- Scottish Enterprise
- Scottish Futures Trust

- Edinburgh Chamber of Commerce
- Federation of Small Businesses
- Forth Green Freeport
- GSS Developments
- Ryden (commercial property agent)

Details of the comments are set in the study report, and taken into account in the analysis, summary and conclusions.

Summary of implications for the Proposed Plan

The office, retail, visitor accommodation and leisure sectors show a strong market preference for locating in the city centre. However, there is limited available land in the city centre and this means that these uses can be in competition with each other for sites and sometimes buildings.

The evidence also shows that there is strong demand for new additional office floorspace in the city centre, but due to market difficulties, developers are unable to deliver it in advance of it being pre-let. The Council will need to consider if the Proposed Plan should define the spatial priorities for different uses in the city centre.

Existing office floorspace is being lost to alternative uses including, hotels, serviced apartments and purpose built student accommodation which tend to have higher site values and single occupiers making them easier to deliver. The Council will need to consider if the Proposed Plan should include a strategy to prevent the loss of existing floorspace in the city centre and how it could help to support the delivery of further office floorspace.

The evidence shows that demand for office floorspace outwith the city centre, particularly West Edinburgh, is muted, with a significant oversupply and low take up. The Council will need to consider if the Proposed Plan should review existing spatial policy to respond.

The evidence shows there is sufficient industrial land to meet employment needs over the next ten years. However, the majority of serviced and non-serviced land lies to the west side of Edinburgh, in particular at Newbridge. The Council will need to consider if the Proposed Plan should protect or allocate land elsewhere in the Edinburgh area for industrial purposes, potentially nearer to areas of deprivation, taking into account public transport accessibility and the overall spatial strategy of the plan.

The Proposed Plan will need to consider if sufficient land is available and allocated for all business and industry needs, taking account of the profile of Edinburgh's economic needs as set out in this topic paper. A key challenge will be the balance of

economic needs with that of other uses and considerations such as housing, sustainability and transport.

Statements of agreement / dispute

Scottish Enterprise have confirmed they consider the evidence sufficient. There are no outstanding issues.

19: City, town, local and commercial centres

Topic	**19: City, town, local and commercial centres**
Description of topic	Assessment of Edinburgh's network of centres, including a review of retail patterns and trends.
Information required by the Act	Town and Country Planning (Scotland) Act 1997, as amended: • Section 15(5) - set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and the principal purposes for which the land is used.
Relevant NPF4 Policies	• Policy 15 Local Living and 20 minute neighbourhoods • Policy 27 City, town, local and commercial centres • Policy 28 Retail
Local Development Plan Guidance	• City, town, commercial and local centres (Page 82) sets out that the Evidence Report is likely to include information on existing networks of centres, and evidence of where clustering of non-retail uses may be adversely impacting on the wellbeing of communities. It signposts potential sources of information that planning authorities may wish to prepare or review including, town centre audits and strategies, the local economic strategy and a brownfield urban capacity study. • Retail (Page 84) sets out that the Evidence Report is likely to include information of where there is a need for further retail provision, for example through a retail study, and information about the local food environment.
Linked Topic Papers	• Topic 15 Local living • Topic 18 Economy, business and industry • Topic 20 Tourism, culture and creativity • Place Profiles
List of and links to evidence	• **CD033** City Plan 2030- Written Statement, City of Edinburgh Council, November 2024 • **CD105** The Town and Country Planning (General Permitted Development) (Scotland) Order 1992, UK Government, March 1992 • **CD227** The Town and Country Planning (Use Classes) (Scotland) Order 1997, Scottish Government, February 1997 • **CD072** Non Statutory Guidance - City Centre and Town Centre, City of Edinburgh Council • **CD039** Edinburgh Economic Needs Study: Retail Study, Roderick Maclean Associates and Ryden (City of Edinburgh Council), September 2025

- **CD038** Edinburgh Economic Needs Study: Economic Needs: Overview, Biggar Economics (City of Edinburgh Council), February 2025
- **CD332** Non Statutory Guidance - City Centre Shopping & Leisure, City of Edinburgh Council, January 2025
- **CD082** Edinburgh Economy Strategy, City of Edinburgh Council, November 2021
- **CD075** Edinburgh City Transformation, City of Edinburgh Council, 2019
- **CD287** Edinburgh as a Feminist City Working Group Update Committee Report 28 January 2026
- **CD037** Economic Needs Study: Summary and Land Use Implications, Ryden (city of Edinburgh Council), November 2025
- **CD041** Economic Needs Study: Office Report, Ryden (City of Edinburgh Council), July 2025
- **CD042** Economic Needs Study: Industrial Report, Ryden (City of Edinburgh Council), September 2025
- **CD043** Edinburgh Economic Needs Study: Visitor Accommodation, AR Hospitality Consulting, May 2025Economic Needs Study: Leisure, Ryden (City of Edinburgh Council), October 2025
- **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023
- **CD272** Consultation Princes Street and Waverley Valley Strategy, City of Edinburgh Council, September 2024
-

List of matters covered

This topic paper sets out the evidence in relation to the area's city, town, local and commercial centres. It covers:

- National Context
- Local Context
- Economic Needs Study
- Overview of and analysis of Network of centres
    - Changing Retail Context
    - City Centre
    - Town Centres
    - Local Centres
    - Commercial Centres
- Clustering of non-retail uses
- Drive through locations
- City and town centre living.

Summary of evidence

National Context

The Scottish Government established an independent review group in 2020 to review the progress of the 2013 National Town Centre Action Plan. It was to place particular emphasis on:

- recovering from the impact of COVID-19 on Scotland's town centres
- meeting Scotland's climate change ambitions
- identifying what further steps should be considered to make towns fit for all in Scotland, and
- advice on how to adopt a commitment to 20 minute neighbourhoods for cities, towns, rural and island communities.

The subsequent report with 59 recommendations led to a joint response from the Scottish Government and COSLA and a revised 2022 Town Centre Action Plan 2. This set out several actions around a reaffirmed Town Centre First Principle. It recognises the importance of planning in diversifying the offer within city and town centres, helping them to thrive, improve their resilience and anticipate continuing societal, environmental and economic change. Its actions include implementing town centre first, taxation, support for town centre living, digital towns, enterprising communities and vibrant economies, climate action and measuring and evaluating progress for improvement.

The Scottish Government's Transforming Planning programme included a review of permitted development rights (PDRs) that has had direct implications for retail units, particularly in designated centres. Phase two of the programme introduced new and extended PDRs and made changes to the Use Classes Order in relation to changes of use in centres on 31 March 2023. In summary:

1. Introduction of a new class 1A (shops and financial, professional, and other services) amalgamating Class 1 and Class 2 uses.
2. Introduction of the following new PDRs:
    a. Allowing a change to Class 1A to/from a hot food takeaway or Class 3 (Food and Drink). Change of use from premises for the sale or display or motor vehicles to Class 1A (with restrictions on floor space)
    b. Restriction on the change of use to Class 3 from Class 1A where the premises are below or within 1 metre of a dwelling
    c. New PDR allowing change of use to Class 4 (Business) from Class 1A or Class 3 if the building is 300sqm or less
    d. Allowing a change to Class 1A from a betting office or payday loan shop. Change of use to a betting shop, pay day loan shop or public house requires planning permission.

3. New PDR for change of use of, and the placement of furniture on footpaths when adjacent to, a Class 3 (Food and Drink) or public house premises for consumption of food from those premises.

These changes in PDRs may have implications for the Proposed Plan as the current City Plan 2030 has policies and related planning guidance that seeks to protect the primary retail function of the city, town and local centres by restricting proposed changes of use of retail units to non-retail uses. The Council will have to consider in preparing the Proposed Plan whether there is a need to revise the policy approach, within the context of existing NPF4 policies.

The evidence in this topic paper set out below shows that the Council's approach has to date been mostly successful in protecting the retail function of centres. The fact that most of the town and local centres have residential dwellings within one metre of shop units will also, to a certain extent, limit the effect of the changes in the PDRs.

Local Context

Edinburgh Economic Strategy 2021

The Council's Economic Strategy aims to provide a clear direction for Council work to support the economy through a period of change and set clear priorities for actions on which it will collaborate with partners. The Strategy sets out many actions under three priority work programmes for a stronger, greener and fairer economy. The actions most relevant to this topic paper are:

- to deliver planning services that are responsive and create spaces for local businesses to thrive in ways that are safe and sustainable
- deliver actions for City Centre recovery and develop a five year City Centre Action Plan with the Scottish Government and other city partners, and
- deliver a 20 minute neighbourhood strategy that supports local businesses to provide the daily needs of their communities and create local jobs.

Edinburgh Local Development Plan 2016 and City Plan 2030

City Plan 2030 identifies a network of centres in Edinburgh as set out in Table 14 of part four of the Plan. These are typically long established, though some alterations of boundaries has occurred over time and new proposed centres have been added to reflect new development.

As shown in Figure 19.1 below the network comprises the City Centre, which is the largest shopping centre in the Edinburgh City Region, eight town centres which serve as a focal point for their local communities, 63 existing local centres which contribute to the sense of identity of neighbourhoods and seven commercial centres, which provide a mixture of comparison goods and leisure services with extensive car

parking provision. The boundaries of these various designated centres are shown on the City Plan Proposals Map.

There are also a number of speciality shopping streets in the Edinburgh Old Town, outwith the city centre retail core, where a concentration of independent and specialist retailers have given them a distinctive shopping character and interest worthy of protection.

In addition, there are a numerous undesignated local shopping parades or neighbourhood centres scattered across the city supporting local living (20-minute neighbourhoods) and a complementary role to other designated centres. The regular auditing of this network of designated centres, the details of which are set out below, demonstrates that for the most part that it remains a sound framework for the Proposed Plan. During the preparation of the Proposed Plan, consideration will need to be given to whether any changes have occurred within the Edinburgh area that requires amendments or new additions to the network of centres and or a change to the policy approach in the LDP.

City Centre		
City Centre Retail Core		
Town Centres		
Bruntsfield/Morningside	Corstorphine	Gorgie/Dalry
Leith/Leith Walk	Nicolson Street/Clerk Street	Portobello
Stockbridge	Tollcross	West Edinburgh (Proposed)
Local Centres		
Ashley Terrace	Balgreen Road	Blackwell
Boswell Parkway	Broughton Street	Bryce Road, Currie
Buckstone Terrace	Chesser	Chesser Avenue
Colinton	Comiston Road	Corslet Place
Craiglockhart	Craigmillar	Dalkeith Road
Davidson Mains	Drylaw	Drumbrae
Dundas Street	Dundee Street	East Craigs
Easter Road	Ferry Road (East)	Ferry Road (West)
Forrest Road	Gilmerton	Goldenacre
Gracemount	Hillhouse Road/Telford Road	Jock's Lodge
Juniper Green	Liberton Brae	Main Street, Balerno
Main Street, Kirkliston	Marchmont North	Marchmont South
Mayfield Road	Milton Road West	Moredun Park Road
Muirhouse/Pennywell	Oxgangs	Parkhead
Pentland View Court, Currie	Piershill	Polwarth Gardens

Queensferry (centre)	Ratcliffe Terrace	Restalrig Road
Rodney Street	Roseburn Terrace	Saughton Road North
Scotstoun Grove, Queensferry	Sighthill	Stenhouse Cross
Viewforth	Walter Scott Avenue	Waterfront Broadway
West Maitland Street	Western Corner	Whitehouse Road
Wester Hailes	West Granton Road	Crewe Road North
Fountainbridge (Proposed)	Granton Waterfront (Proposed)	Brunstane (Proposed)
Crosswinds (proposed)	West Town (proposed)	
Commercial Centres		
Cameron Toll	Craigleith	Hermiston Gait
Meadowbank	Newcraighall/The Jewel	The Gyle
Ocean Terminal		
Speciality Shopping Streets		
Cockburn Street	Grassmarket	High Street/Lawnmarket/ Canongate
Jeffery Street/St Mary's Street	Victoria Street/West Bow	William Street/Stafford Street/Alva Street

Figure 19.1: LDP Network of Centres

Planning policy to determine development proposals in identified centres, including retail development, are articulated in Policies Re1 to Re 11 of City Plan 2030. The policies are in close alignment with NPF4 policies as they are based on the Town Centre First principle. However, the LDP policies contain significantly more detail, as a result of the complexity of dealing with applications for retail proposals in a large city that not only provides the role of regional shopping centre, but also has eight town centres, and numerous local centres which together seek to meet the needs of approximately half a million people living within the Council's largely urban area.

With regard to Policy Re 4 Alternative Use of Shop Units in the City Centre and Town Centres, the Council has prepared City Centre and Town Centre planning guidelines as material considerations. These guidelines were prepared following comprehensive analysis of each centre and set out detailed advice tailored to deliver the appropriate balance of uses within each centre to maintain their vitality, viability and deliver good placemaking. These guidelines are used in determining relevant planning applications to assess whether a proposed change of use would undermine the retail function of the centre.

Policy Re 1 Town Centres First Policy is relevant in the context of all retail applications. It has a key role to play, in particular, because it identifies the circumstances in which an applicant has to prepare a retail impact assessment. This is helpful given that national guidance no longer identifies this. Policy Re 2 City Centre Retail Core and Policy Re 3 Town Centres are both supportive of retail

developments in the city centre and town centres. There have been a number of planning applications in recent years to redevelop former department stores on Princes Street for mixed use including retail, which is helping to regenerate vacant units on this key shopping street. Therefore, the evidence shows that the existing policy provisions are lending support to this regeneration.

One alteration of policy set out in City Plan 2030 was to change the status of the town centre guidance from statutory guidance to non-statutory planning guidelines whilst remaining a material consideration, in the context of Policy Re 4. In part this was to reflect the fact that the Scottish Government had altered the planning legislation to remove the provision for statutory guidance, however, it also to allows greater flexibility in decision making when considering proposals for non-retail uses in the centres. The aim being to minimise vacancy levels and increase the vitality and viability of designated centres in the face of changing retail trends. The vacancy data set out below shows that the number of vacant shop units historically remains low and continues to do so, validating the more flexible approach adopted.

Another policy that has been tested in recent years is Policy Re 7 Out-of-Centre Development, providing useful lessons learned. Major retailers are still seeking to bring forward retail units in out of centre locations contrary to national policy. Policy Re 7 sets out a more detailed policy approach than NPF4 and does allow some retail proposals in out-of-centre locations where they meet the strict criterion set out in the policy, for example, in the context of units of less than 250sqm which are contributing to local living or 20 minute neighbourhoods. Such an approach is consistent with national guidance. The Council recently won an appeal (PPA-230-2535) against a refusal for a retail unit in an out of centre location, and the decision relied heavily on this policy and its supporting text which clearly articulates how the policy should be applied. This helps to demonstrate that the policy is helping to successfully deliver national planning policy accordingly.

Policy Re 8 Alternative Use of a Shop Unit in Other Locations sets out policy with regard to alternative uses of shop units outwith defined centres. The purpose of the policy is to guide proposals for change of use, as there are many parts of the city where there are concentrations of commercial uses including retail, food and drink, and entertainment which, although they do not fulfil the role of a local centre, do make a positive contribution to the vibrancy of the city. There is also a specific reference to speciality shopping streets which are identified on the Proposals Map of City Plan 2030, where the policy seeks to protect their ‘special shopping character’. Changes to permitted development rights may have changed the ability of this policy to deliver all its intended outcomes. The Council will have to consider the implications of this when preparing the Proposed Plan and its associated retail strategy, related policies and guidance.

Other Local Strategies

The Council approved the Edinburgh City Centre Transformation (ECCT) strategy in 2019. Through ECCT, the streets and public spaces in the Old and New Town of Edinburgh World Heritage Site will become more inclusive and people friendly where walking, wheeling, cycling, and public transport are prioritised. ECCT will enhance the quality of life for residents and create places that support the local economy and cultural life for residents, working towards a largely traffic free city centre and net zero by 2030. Progress is monitored through the City Centre Transformation Delivery Plan. In addition, a recent City Mobility Plan review has reprioritised some ECCT projects.

This can also be considered in the context of the Council's Feminist City Short Life Cross-Party Working Group to ensure gender equity is central to land use planning and the management and design of public spaces. The most recent report on this in February 2026 considers the steps taken to ensure that women's safety is a key consideration for this. Design considerations must also include the need to ensure gender equality in the layout of public spaces, e.g. design of recreation and play space for women and girls as well as traditional sports pitches and play equipment, design of social spaces for use by women and girls and design for movement to be inclusive by mode and space.

Projects delivered include the City Centre West to East Edinburgh Link, Melville Crescent and Picardy Place public realm enhancements and the major North Bridge refurbishment due for completion in 2026. Funding is available for future projects through the Scottish Government's Active Travel Infrastructure Fund and Bus Infrastructure Fund as well as internal sources such as the soon to be introduced transient visitor levy. Several forthcoming projects are in development making use of these funding opportunities including: Meadows to George Street, George Street and First New Town, George Street to Waverley Bridge, City Centre Implementation and Operations Plan, and ongoing considerations are underway for key corridors such as North and South Bridge, Lothian Road and Cowgate.

To deliver the Council's City Mobility Plan, the Council has developed the Our Future Streets approach. In the city centre, this approach has provided a framework to realise the implementation of a pedestrian priority zone. To achieve this, the allocation of street space will be rebalanced, improving conditions for pedestrians, and the need for general traffic to pass through the centre will be reduced.

The requirement for a Princes Street Waverley Valley Strategy was identified in City Plan 2030 Policy Place 1 Edinburgh City Centre. This Strategy includes a Place Brief for Waverley Station, a public realm framework, an improvement plan for Princes Street Gardens and planning guidance to promote and shape new development on Princes Street. The public consultation took place in 2025. The draft was finalised following the public consultation and submitted to Planning Committee on 12 November 2025, however the Committee voted to continue to develop the strategy

further to allow a more ambitious proposal to emerge. Revisions to the strategy are expected in the second half of 2026.

Economic Needs Study

In 2025, the Council commissioned consultants to prepare an Economic Needs Study. The study comprised a package of seven research report papers to comprehensively examine the Edinburgh economy and identify key issues to inform the Evidence Report and it provides a background source. The Study comprised of papers on the following matters:

- Edinburgh Economic Overview
- Industrial
- Offices
- Retail
- Leisure
- Visitor Accommodation
- Summary and Land Use Implications

This topic paper focusses on retail. There are other topic papers which cover other aspects of the Economic Needs Study: Topic 18 Economy, business and industry and Topic 20 Tourism, culture and creativity.

Retail Study

NPF4 states that LDPs should consider where there may be a need for further retail provision. This may be where a retail study identifies deficiencies in an area's retail provision in terms of quality and quantity, or when allocating sites for housing or the creation of new communities and may be for neighbourhood shopping to support local living.

Full details are set out in the retail study of the wider Economic Needs Study, however, a summary of its findings is as follows:

1. The retail sector is responding to market concentration into larger centres and the shift to online shopping, accelerated by the COVID-19 pandemic then the inflation and interest rate cycle. While competition from retailers has re-emerged for prime destinations and convenience shopping remains resilient, shopping mall redevelopments in many regional towns outwith Edinburgh often replace comparison retail units with other uses. Food and beverage, and leisure continue to be important complementary uses to retail and help to diversify more challenged locations. There have been no major new shopping centres developed in Scotland since St James Quarter opened in 2021.
2. Edinburgh's prime retail activity is concentrated in the city centre, which has emerged as Scotland's prime shopping destination with a very large retailer base including major brands. It is outcompeting comparable UK cities. This has been catalysed by the St James Quarter which has led an eastward shift of the prime retail core and has more than offset the closure of major city

centre department stores, which in turn are in demand for alternative uses whilst retaining ground floor retail. Market activity is more focused on alternative uses (e.g. leisure) rather than comparison shopping.

3. Edinburgh's town centres are continually adapting to local demand through diversification. Among the city's commercial centres, retail parks are in demand and are (paradoxically) supported by restrictive planning policies, while existing shopping malls are diversifying or remodelling to meet their retail, leisure and alternative use potential. The average size of a retail unit has risen across all locations except the city centre.
4. St James Quarter and discount retailers aside, development activity is subdued by historic standards and most of market activity is associated with continuing reuse of existing retail stock.
5. Forecast convenience expenditure growth is very low. Current expenditure, £1,649 million, rises to £1,663 million by 2035 (an increase of 0.8%). Growth is driven by population growth as expenditure per capita falls slightly.
6. Edinburgh is well-served with supermarkets and discount food stores. The relationship between convenience expenditure, floorspace and turnover in each retail study zone indicates limited over-trading above industry average levels, except East Edinburgh; turnover levels are below average in North and West Edinburgh. Overall, there is limited requirement for more convenience floorspace.
7. There are few recent convenience retail consents in Edinburgh, mostly supermarkets. However, there are mixed convenience and comparison consents awaiting determination, notably the proposed new town centre in West Edinburgh.
8. The study presents a low and high forecast for spare convenience expenditure capacity to support additional floorspace up to 2035:
    a. Under the low forecast, there is no spare convenience expenditure over the next ten years.
    b. Under the high forecast, there would be potential to claw back convenience expenditure leakage from Edinburgh and attract new inflows but only at modest levels. Therefore, there would only be a small amount of spare convenience capacity over the next ten years.
9. In the comparison retail sector, a substantial proportion of expenditure is now made on-line. The study estimates it at 35% currently, rising to a forecast 45-50% by 2035. The upward trend seems likely to continue because it is driven by customer attraction to online shopping. The effect is to reduce the amount of additional comparison floorspace required in the future.
10. Total comparison expenditure potential in Edinburgh is £1,618 million at present. Analysis shows very high inflows of comparison expenditure to the city centre, confirming its destination role. For Edinburgh as a whole, inflows from neighbouring authority areas and visitors equate to 66% of total expenditure while outflows to other locations are much lower at 11%. The East

zone attracts very substantial expenditure from East Lothian and Midlothian at Fort Kinnaird, the Newcraighall commercial centre.

11. The distribution of comparison turnover shows the city centre accounts for 50% of the total and commercial centres 33%, the majority of turnover. The share of comparison expenditure taking place in town centres is low at 6%.
12. Comparison retail consents amount to 21,600 sqm of floorspace. In addition, there are several recent mixed use development applications awaiting determination, in particular the proposed new town centre in West Edinburgh.
13. The study forecasts that spare comparison retail expenditure capacity will support existing planning consents and may support some additional comparison floorspace to 2035.
    - Under the low forecast, 50% of comparison spending is assumed to be online by 2035. Total comparison spending would be £1,661 million (+2.7%). There is no forecast spare capacity for 2025-30 or 2025-30 under this scenario.
    - Under the high forecast, 45% of comparison spending is assumed to be online by 2035. Total comparison spending would be £1,827 million (+12.9%), generating £209 million spare capacity or 19,000 sqm net additional floorspace by 2035.
    - The share of internet spend is the key variable. While the low forecast closely matches current trends the study stresses there is inherent uncertainty over the medium to long term. Although there is some potential for additional floorspace, e.g. the new town centre in West Edinburgh, this does not imply much support for increasing floorspace in the existing town centres or commercial centres.

The evidence from the retail study clearly shows that Edinburgh as a whole is adapting positively to changing retail trends, which is helping to protect its role as the regional shopping centre for South East Scotland. The city is well served by supermarkets and discount food stores. The new St James Quarter has had an overall positive effect on the city centre, strengthening it and drawing in more retail demand. Edinburgh's town centres are adapting to demand through diversification. The commercial centres are in demand and are diversifying or remodelling to meet their retail, leisure and alternative use potential. This is all happening despite the fact that forecast expenditure growth is low, with any growth being achieved through population growth rather than increased expenditure per capita.

The retail study confirms that Edinburgh is unlikely to need additional convenience retail floorspace before 2035. Even with the high forecast, the study notes that the potential to attract new convenience expenditure is limited and would require clawing back a proportion of leakage. With regard to comparison expenditure, the study's findings show that the city centre continues to be the main shopping centre, which helps to protect its role as the city region shopping centre. As a result of the growth of online shopping, the additional expenditure generated by population growth is

expected to be very limited under the low scenario and there is no need for additional retail floorspace accordingly. Under the high scenario, it would represent a modest 12.9% rise in the need for comparison expenditure floorspace. However, the high scenario is dependent on much lower growth in online shopping and could largely be accommodated within the city centre, with some of the additional expenditure being captured in the new town proposed in West Edinburgh. There does not appear to be a need to expand retail floorspace in commercial centres to cater for additional retail expenditure, and doing so would risk undermining the city centre by drawing demand away from it.

The Council will take into account the results of the retail study when preparing the strategy for the Proposed Plan and consider locations where new retail or related commercial uses may be required by demand or to support communities. The Place Profiles prepared as part of the Evidence Report also contain detail on town and local centres within communities which will feed into this work.

Overview and analysis of the network of centres

Changing Retail Context

Town and Local Centres make an important contribution to inclusive economic growth and provide a source of employment, services, and amenities for local communities. Town centres can be hubs for a range of activities and allow services and facilities (retail including healthier food outlets, markets, pubs, restaurants and cafés, banks etc), that are used on a day-to-day basis to be easily and affordably accessed, supporting living well locally which is cover in Topic 15 Local living. Each centre has its own characteristics, strengths and weaknesses, and it is important that these embrace the policies and approach of NPF4 and wider consumer trends including, changing consumer habits, an ageing population, new technology, and the continued growth of e-commerce.

Town centres are facing the challenges of changing and evolving retail patterns. The pace of change for town centres has increased, with centres being affected by several factors including the COVID-19 pandemic and the cost-of-living crisis, although most of Edinburgh's centres seem to be robust in the face of change as identified in the retail study. Nevertheless, there has been a resultant change in people's behaviour such as increasingly shopping online, becoming more aware of and appreciative of the local economy, and embracing the need for sustainability and resilience to climate change.

Encouraging a more varied mix of uses, whilst still retaining retail units, and increased footfall helps to create livelier designated centres; reduces the need to travel; addresses challenges from changing trends and customer habits; and competition from online shopping. This is consistent with NPF4 aims. Encouraging more housing-led development that incorporates local facilities to meet local needs; improving public realm, streetscapes, and green spaces; and raising design standards are also key factors in attracting further inward investment. All of which

helps to increase footfall, encourages the use and demand for services and facilities, and supports social interaction.

Travel behaviour has also been changing as a result of social and technological trends, some of which were accelerated by the COVID-19 pandemic. Key changes included increased home working or hybrid working patterns, increased online meetings and the increase in digital shopping which is changing people's relationship with town centres. The delivery of new centres associated with new housing-led mixed use development identified in the previous LDP site allocations will be a key factor in ensuring the success of centres and supporting national planning policy, in particular with regard to 'living locally' objectives. This matter will require to be considered further through any new allocations brought forward through City Plan 2040.

The LDP Guidance points to the existing network of centres as a potential source of information for the Evidence Report.

City Centre

The retail core of Edinburgh city centre is the largest shopping centre in the Edinburgh City Region, with a wide range of shops and other entertainment, leisure and cultural uses and excellent public transport services, both bus and rail, providing access from most parts of the city and beyond. The city centre also serves a multi-functional role as the capital of Scotland, the source of the political decision making at the Scottish Parliament, a major employment generator particularly in terms of office-based jobs, and it also is an international tourist destination with most of the city centre designated a World Heritage Site.

The Council monitors the mix and changes of uses in the city centre through the Edinburgh retail survey. The profile of uses has changed between 2015 and 2024 as the results of the survey show in the tables below.

Year 2015	Shop	Professional services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	352	38	83	4	36	8	34	6	0	7	568
Floorspace	209,791	20,026	19,080	911	7,368	504	NA	973	0	1435	260088
Percentage	62%	7%	15%	1%	6%	1%	6%	1%	0%	1%	100%

Year 2024	Shop	Professional services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	341	19	114	6	64	3	42	3	0	1	593
Floorspace	167,507	11,038	32,342	9,182	33,937	252	NA	443	0	481	255182
Percentage	58%	3%	19%	1%	11%	1%	7%	1%	0%	0%	100%

Figure 19.2: Profile of uses in the city centre 2015 vs 2024

The survey data shows that shop floorspace has decreased significantly since 2015 in the city centre, although shops still represent the majority (58%) of all units, down from 62%. Despite this, the overall reduction in total floorspace represents just a

1.8% loss. A key contributing factor to this has been the loss of the large floorplate department stores, such as Jenners, Frasers, Debenhams and British Home Stores on Princes Street, which are stores that had been a feature of the retail landscape for many decades. The department store model is largely no longer viable for retail businesses and there has been a trend towards smaller floorplate retail units as a consequence of the trend to more online shopping. 20 of the shop units are food stores selling a mixture of goods including; groceries, health food and speciality stores such as delicatessens. Another feature of national change has been banks closing local branches; the data shows that over the last nine years this has been a significant factor in reducing the number of professional services in the city centre and they now represent just 3% of units.

Although the vacancy rate has increased significantly from 6% to 11%, it is important to recognise that this is not a particularly high vacancy rate and is comparable or less than many other larger towns or cities in Scotland. For example, according to available Councils' Evidence Reports, Falkirk town centre has a vacancy rate of 16%, Stirling town centre 15%, and Inverness town centre 12%. There is no overall vacancy rate available for Glasgow city centre, however, Buchanan Street in Glasgow, which is a key shopping destination similar to Princes Street, has a vacancy rate of 14%, compared to Princes Street, which has a vacancy rate of 13%. Furthermore, there is no evidence of a clustering of vacancies that raises concerns.

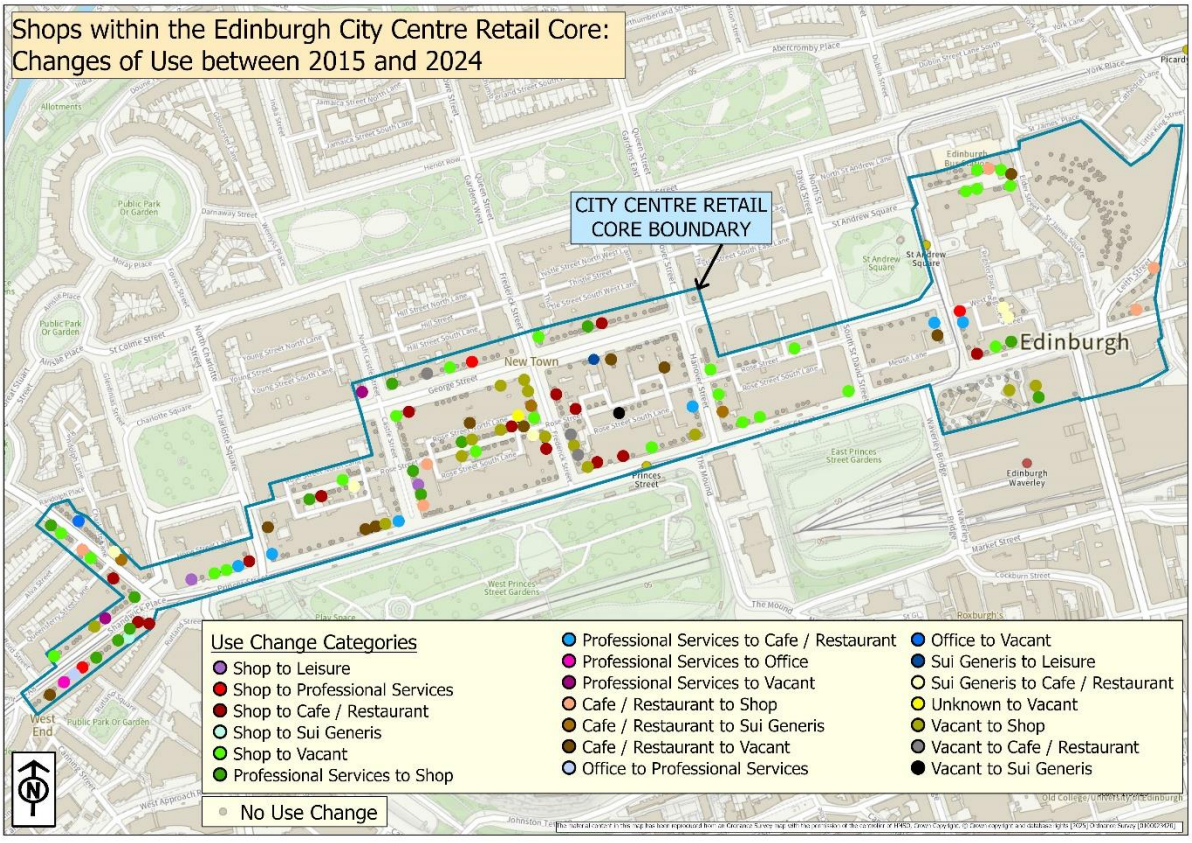


Figure 19.3: Change of use within the Edinburgh City Centre Retail Core 2015 vs 2024

There are signs of positive change in the city centre, through the increasing diversity of uses. For example, the number of restaurants has increased raising the percentage of units from 8% to 11% and there has also been an increase in leisure uses. Although there have been only two new leisure developments, one of them is significant representing a large increase in floorspace. The Johnnie Walker Experience on Princes Street combines tourism, leisure and retail over multiple floors within a former department store building and has proved to be very successful since it opened, attracting over one million visitors in its first three years according to VisitScotland. It has strengthened the role of the west end of Princes Street, by providing a strong visitor draw and improved footfall, and brought a large listed building back into use.

Princes Street is a key shopping street in Edinburgh and has been affected by changes in the retail environment in recent years, particularly because it included a number of large department store businesses run by national operators that had reduced their footprint or gone out of business. It was also affected by the opening of the new St James Quarter at the east end of Princes Street which replaced the previous St James Centre. The new centre has been very successful in attracting the expenditure of existing and new customers. It has also resulted in several existing businesses on Princes Street, such as Next, relocating into the new galleria shopping centre. However, the evidence shows that other businesses have since taken over the vacant units and there are sites where redevelopment is underway.

Whilst the loss of department stores has resulted in an increase in vacant units on Princes Street - most of them with large floorplates - it has provided the opportunity for positive change. The former Debenhams department store at 109-112 Princes Street has been granted planning permission (20/05444/FUL) for a hotel, with a bar and restaurant on the ground floor which will help to maintain an active frontage at street level. A revised proposal with an amended design was submitted in 2024 for consideration (24/0573/FUL), but the proposed uses remain unchanged.

Similar hotel proposals have been granted consent for units 70-71 Princes Street (23/06554/FUL), and 104-108 Princes Street (23/01417/FUL), former shop units, that retain retail units on the ground floor and reuse vacant or former storage space on upper levels. An application (23/06882/FUL) for serviced apartments has also been granted for the upper levels of 72-77 Princes Street although the ground floor retail units are unaffected.

The former British Home Stores building at 64 Princes Street has also been converted into a hotel on upper floors with the retention of a retail unit at ground floor and is now operational. Finally, the former Jenners store has similarly been granted consent for a hotel and restaurant, with retail being retained on the ground and first floors. It is currently under construction.

All of these developments demonstrate that Princes Street is responding to changes in retail trends through diversification. Although the changes are resulting in more

hotels in the city centre, the evidence set out in the Topic Paper 20 Tourism, culture and creativity shows there is demand for new hotel accommodation in the city centre to cope with growing visitor trips, and as a result it represents a positive change, if managed carefully to prevent total loss of retail units on the ground floor and to maintain an active street frontage.

Overall, Edinburgh has a strong and resilient city centre and the evidence shows it has proved more robust in absorbing the turbulent changes in retailing trends that have affected most of Scotland. However, in preparing the Proposed Plan, careful consideration will still need to be given to these changes taking place, in the context of deciding what the best policy approach should be to ensure and retain the right balance of uses within the city centre core.

Town Centres

Edinburgh's town and local centres make an important contribution to inclusive economic growth, provide a source of employment, goods and services for local communities, businesses and visitors and are hubs for various roles and a range of activities. Edinburgh has eight town centres that vary in size and character and have evolved over time to become centres of socio-economic activity within densely populated areas that form part of the wider Edinburgh urban area.

The Council monitors the mix and change of uses in town and local centres through the Edinburgh Retail Survey. The profile of uses has changed between 2015 and 2024 as the results of the survey show in the tables below. It should be noted that the floorspace figures do not include public houses as the data is not available. The analysis also looks at the diversity and availability of food retail in the town centres, which contributes towards a healthy diet. The link between food access and contribution to healthy lifestyle, particularly in areas of lower deprivation, is assessed in more detail in Topic 16 Health and wellbeing, Topic 15 Local living and the Place Profiles.

As previously outlined, the Council has previously prepared detailed planning guidance for each town centre to set out a tailored policy approach for proposed changes of use of shop units. The preparation of this guidance also involved a detailed 'public life street' assessment which explored how the town centre should evolve to maximise the potential for benefiting public life and a health check which has considered the centre's strengths, vitality and viability, weaknesses and resiliencies.

Although these were undertaken nearly 10 years ago, the analysis and aims still remains valid as there has only been modest change in the identified town centres and most of the problems identified often remain ongoing concerns.

A systematic methodology using direct observation techniques was used to assess both the place and movement function of each town centre and the results are set out in each of the town centre guidance.

The following section outlines the current position with each of Edinburgh's town centres.

Bruntsfield/ Morningside

Bruntsfield/Morningside Town Centre is located along a main arterial route leading south from the city centre. The area is densely populated with 37,043 people living within ten-minute walking distance of the town centre. There are also frequent bus services providing quick and sustainable access to the city centre. It is historic in character with many high density listed buildings and the majority of it is within Marchmont, Meadows and Bruntsfield, Merchiston and Greenhill, and Morningside Conservation Areas.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting shops	Loan Shops	Other	Total
No of Units	171	31	31	0	7	13	1	2	0	0	256
Floorspace	23008	3212	3641	0	578	1015	NA	237	0	0	31691
Percentage	67%	12%	12%	0%	3%	5%	0%	1%	0%	0%	100%

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting shops	Loan Shops	Other	Total
No of Units	172	24	33	1	11	15	1	1	0	2	260
Floorspace	21016	2586	3951	159	1516	1067	NA	87	0	244	30626
Percentage	66%	9%	13%	0%	4%	6%	0%	0%	0%	1%	100%

Figure 19.4: Profile of uses in Bruntsfield/Morningside Town Centre 2015 vs 2024

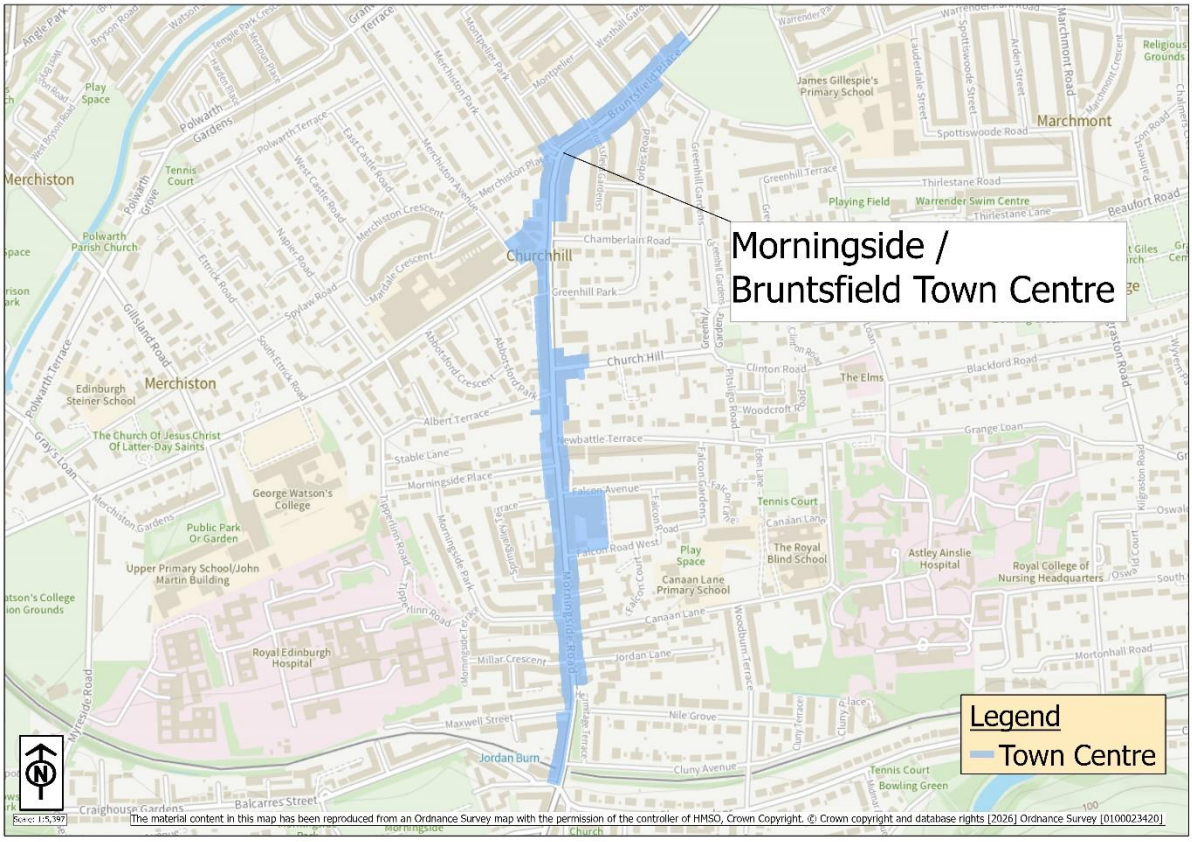


Figure 19.5: Morningside/Bruntsfield Town Centre map

Data from the retail survey shows that there has been a slight change in circumstances in Bruntsfield and Morningside. The vacancy rate has increased from

5% to 6%, and there has been a small increase in the number of shop units. There has been an increase in the number of units in restaurant use to 13%, however, retail continues to represent two-thirds of all units. Although there has been an increase in takeaways to reach 6%, there is now only one betting shop and there is no evidence of a clustering of non-retail uses likely to adversely impact on the wellbeing of communities; this specific issue is covered later in the topic paper as a separate matter. Overall, the town centre looks to be in robust health unaffected by broader retail trends. There are 11 food stores in the town centre, including a large premium supermarket and various speciality stores including delicatessens and health food stores.

The public life street assessment shows a mix of place function scores with some aspects very positive, for example feeling secure, and some low such as feeling safe from traffic. Regarding pedestrian movement it scored poorly due to narrow pavements, poor surfaces etc. The guidance sets out three overarching aims as part of a vision for the town centre; prioritising pedestrian and cycle movement, promoting and facilitating staying times by making environmental improvements to enhance visual interest and comfort, and ensuring a mix of uses to meet the needs and demands of the population thus maintaining it as a destination for both shopping and leisure.

Corstorphine

Corstorphine Town Centre is located along a main arterial route leading west from the City Centre. The area has a population of 15,721 within ten minute walking distance of the town centre and is less densely populated that some other town centres with higher density suburban housing and tenements limited to the vicinity of St John's Road. There are frequent bus services that provide quick and sustainable access to the city centre and it is also on the route of the airport link bus. The town centre has a mixed character, with the eastern half more historic and within a designated conservation area. The western half is an eclectic mix of buildings in terms of scale, design and age. At the western end of the town centre are two stand-alone supermarkets, a large format store and a smaller discount retailer, along with a fast-food restaurant with drive through.

Year 2015	Shop	Professional services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	58	17	12	0	8	5	2	4	0	4	110
Floorspace	20352	3098	1378	0	934	815	NA	404	0	536	27517
Percentage	52.7%	15.5%	10.9%	0.0%	7.3%	4.5%	1.8%	3.6%	0.0%	3.6%	100%

Year 2024	Shop	Professional services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	52	17	17	1	4	2	2	2	0	2	99
Floorspace	20998	1751	1600	229	443	93	NA	221	0	443	25778
Percentage	52.5%	17.2%	17.2%	1.0%	4.0%	2.0%	2.0%	2.0%	0.0%	2.0%	100%

Figure 19.6: Profile of uses in Corstorphine Town Centre 2015 vs 2024

Figure 19.7: Corstorphine Town Centre map

Data from the retail survey shows that there has been some changes in Corstorphine Town Centre. In particular, the number of units has decreased overall by 11 due to some demolition. However, the percentage of units in retail use has remained almost the same at 52%. This is slightly lower than the other town centres. The number of units in restaurant use has increased to 17% and the vacancy rate has dropped from 7% to 4% which is a positive sign. The number of betting shops and hot food takeaways has actually reduced and like all the town centres, there are no high interest loan shops. There is no evidence of a cluster of non-retail uses adversely impacting on the wellbeing of communities. As a result, there is a healthy mix of uses in the town centre and retail continues to represent half the units. The town centre looks to be in robust health unaffected by broader retail trends. There are five food stores in the town centre, including a large supermarket, a budget supermarket, and a speciality shop.

The public life street assessment shows a mix of strengths such as a strong local community, well connected bus route and perception of safety but also weaknesses such as traffic congestion, associated pollution, uneven surfaces and historic village separated from the centre. Some opportunities have been identified to improve the town centre such as re-instatement of the community hub and improved pedestrian environment and reduction in pollution. Although there has been a reduction in pollution, it is still identified as an air quality management area. More recent changes such as the introduction of a low traffic neighbour scheme has helped to improve

conditions for active travel and create attractive streets but the issues identified within the street life assessment still remain a concern despite this improvement scheme.

Gorgie/Dalry

Gorgie/Dalry Town Centre is located along a main arterial route leading south-west from the city centre. It is split into two sections, the Gorgie Road part to the west which includes two stand-alone supermarkets, and the Dalry Road part, some of which is within the Dalry Colonies Conservation Area and the north end of the town centre is adjacent to Haymarket Station. It is one of the more densely populated parts of the city, predominantly tenement buildings, with over 38,580 people living within ten-minute walking distance of the town centre. There are also frequent bus services providing quick and sustainable access to the city centre. The town centre is mixed in character with many high-density tenement sections, but also many single storey and double storey buildings of different ages along its length as a result of redevelopment.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	57	10	17	1	10	5	1	1	0	5	107
Floorspace	8,513	998	2,014	76	1,884	437	NA	61	0	503	14,486
Percentage	53%	9%	16%	1%	9%	5%	1%	1%	0%	5%	100%

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	61	7	18	1	11	5	1	0	0	5	109
Floorspace	9,224	658	1,067	126	1,375	440	NA	0	0	585	13,475
Percentage	56%	6%	17%	1%	10%	5%	1%	0%	0%	5%	100%

Figure 19.8: Profile of uses in Dalry Town Centre 2015 vs 2024

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	69	14	5	1	16	9	2	3	0	1	120
Floorspace	20,108	822	428	174	1,026	447	NA	400	0	80	23,485
Percentage	58%	12%	4%	1%	13%	8%	2%	3%	0%	1%	100

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	74	12	5	0	13	11	2	2	0	1	120
Floorspace	16,660	503	501	0	882	154	NA	276	0	79	19,055
Percentage	62%	10%	4%	0%	11%	9%	2%	2%	0%	1%	100%

Figure 19.9: Profile of uses in Gorgie Town Centre 2015 vs 2024

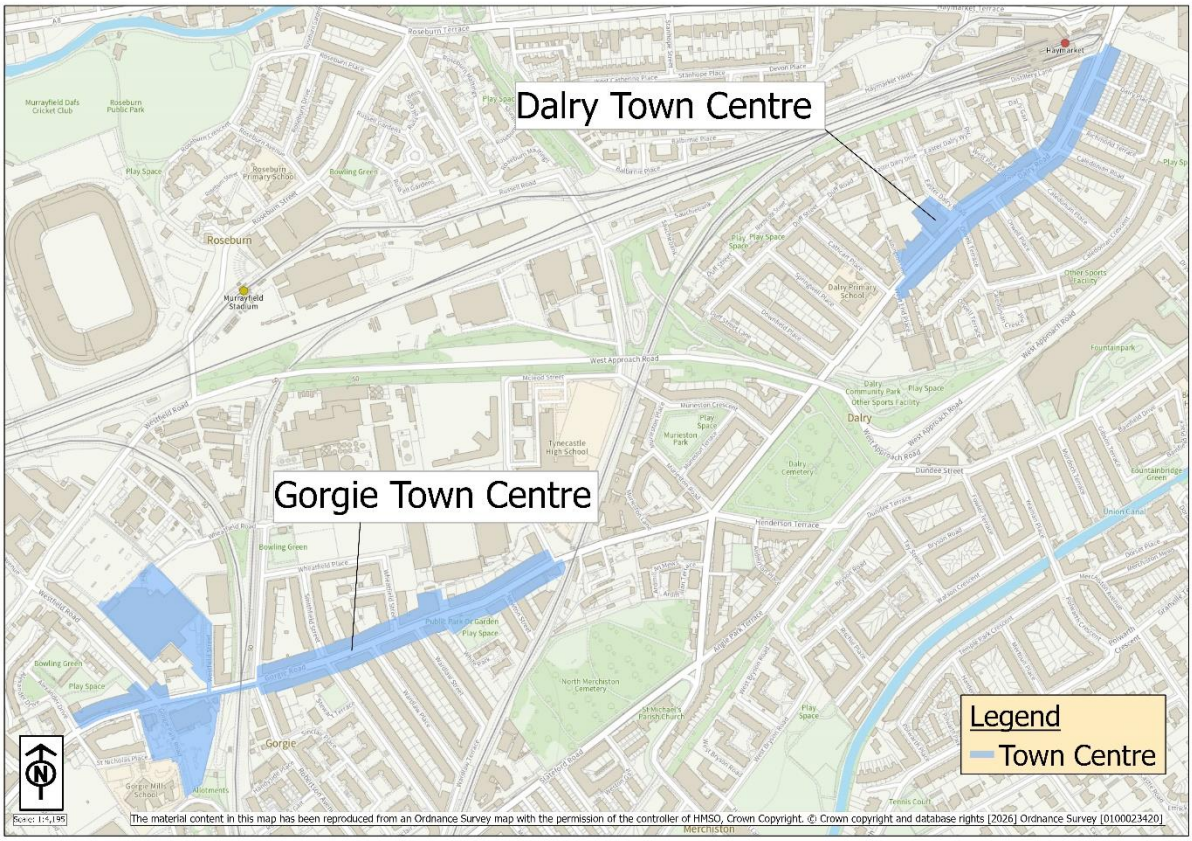


Figure 19.10: Gorgie and Dalry Town Centres

Gorgie and Dalry has traditionally been identified as a single town centre, although they are split into two parts due to a lack of shop units in the middle section, because the streetscape has a continuity with no obvious divide. However, for the purposes of assessing them, separate tables have been produced. Dalry has only changed slightly between 2015 and 2024. There has been an increase in the number of shops and conversely a drop in units being used for professional services. The only betting shop is now gone. Most of the other uses are unchanged. There is no evidence of a clustering of non-retail uses likely to impact on wellbeing of communities. There are eight food stores in the town centre including a supermarket, and small grocery store and six speciality shops, some of which provide authentic imported food.

In Gorgie, there has also been an increase in shop units, with a drop in professional services. There are two more takeaways since 2014 and the number of betting shops has dropped to two. The data shows that the number of vacant units has also dropped from 13% to 11%. Although Gorgie has the highest percentage of takeaways at 9%, it is only slightly higher than the others and there is no evidence of a clustering of non-retail uses likely to impact on wellbeing in this town centre. Although these two town centres have the highest vacancy levels, it is only marginally higher than the next nearest centre (Leith) and not a level of concern. Therefore, the data shows that both these town centres look to be in reasonable health largely unaffected by broader retail trends. There are 15 food stores in the

town centre including a large supermarket, a supermarket, a budget supermarket, and eleven speciality shops providing various authentic imported food.

In November 2022, the Council began engagement with the local community on a Dalry town centre improvement project. The purpose of the project was to involve the community in a street design process, starting at an early stage, in order to identify priorities for the Town Centre to create a healthier and thriving neighbourhood where everyone can meet most of their daily needs within a short walk or wheel from their home. The project began with engagement to understand barriers to walking and cycling and to identify opportunities to improve the public realm. The Council organised drop-in events, spoke with community groups and commissioned an online survey. It also held events at local schools.

The engagement identified a number of problems including: lack of safe cycling provision, low quality walking provision, lack of maintenance to surfaces, lack of provision for impaired people and an area dominated by vehicular traffic. Respondents also identified preferred solutions to address these problems. These comments and suggestions were used as input for stage two, concept design. Further consultation was subsequently carried out on the concept design for Dalry town Centre which was developed with the support of consultants. The Council will continue to take this project forward in the context of delivering living well locally.

In addition, the public life street assessment shows a mix of strengths such as a diverse small independent businesses, high footfall, good transport lines and links to amenities and cycle routes, but also weaknesses such as lack of places to gather, lack of green space, and fragmentation between Gorgie/Dalry which mirror some of the responses received in the more recent engagement project. Some opportunities have been identified to improve the town centre such as providing opportunities to meet socially, improve walking/cycling experience, integrate planting/street trees and enhancing connectivity. Although this study was done a number of years ago, the analysis and aims remain valid as there has only been modest change in the town centre and most of the problems identified remain ongoing concerns which the Council hopes to address through the improvement project.

Leith/Leith Walk

Leith/Leith Walk Town Centre starts just to the north of the city centre and follows Leith Walk north to take in parts of Great Junction Street, Duke Street and the Kirkgate. Most of the town centre is within either the Leith Conservation Area or the New Town Conservation Area. Leith Ward has the highest population density in the city and is one of the most densely populated areas in the UK. There are over 52,679 residents within ten minutes walking distance of the town centre boundary. Leith/Leith Walk Town Centre is on the route of the Edinburgh Tram and well as numerous bus services giving fast and sustainable access to the city centre.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	222	43	32	6	39	31	23	8	0	15	419
Floorspace	37,872	6,821	3,609	453	5,204	2,565	NA	1,254	0	1,445	59,223
Percentage	53%	10%	8%	1%	9%	7%	5%	2%	0%	4%	100%

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	233	49	34	6	33	36	24	10	0	15	440
Floorspace	39,332	6,013	4,256	583	2,972	2,947	NA	1,791	0	2,094	59,988
Percentage	53%	11%	8%	1%	8%	8%	5%	2%	0%	3%	100%

Figure 19.11: Profile of uses in Leith and Leith Walk Town Centre 2015 vs 2024

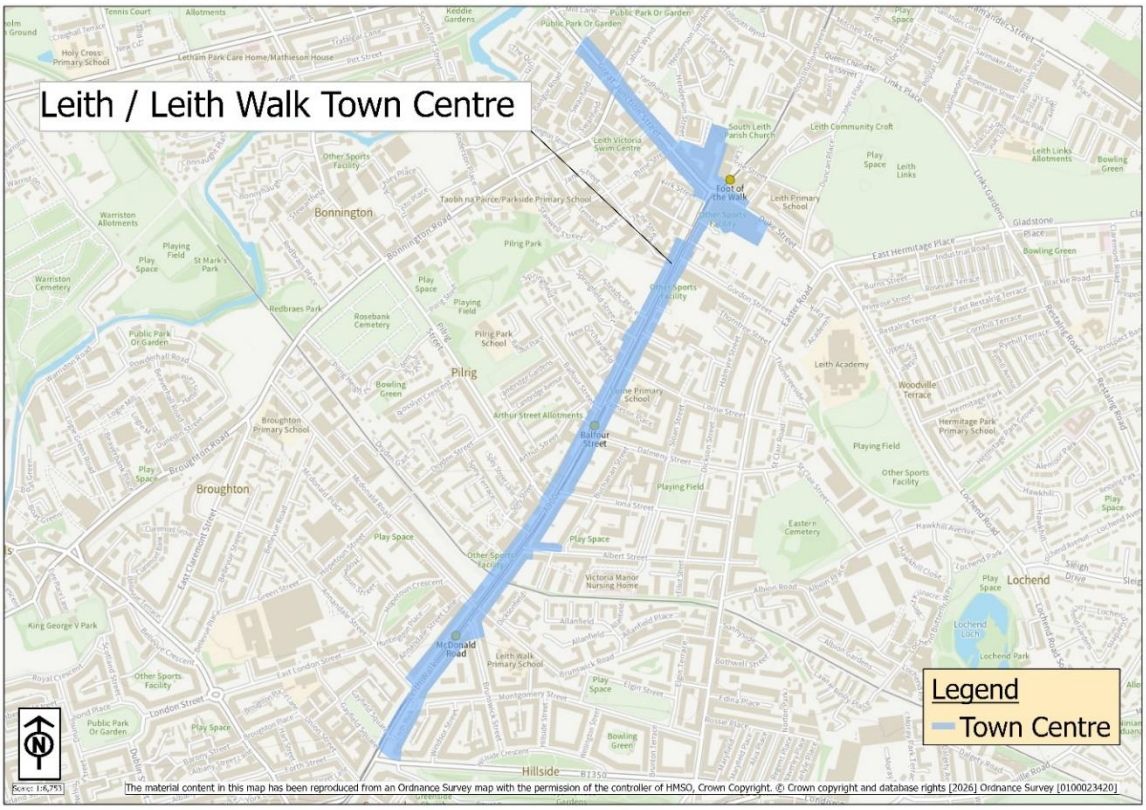


Figure 19.12: Leith/Leith Walk Town Centre map

Data from the retail survey shows there has been some changes in Leith and Leith Walk. A review of the town centres in the context of preparing City Plan 2030 resulted in some minor changes to the town centre boundary. This has caused an increase in the number of units in the town centre. Despite this, the percentage of units in shop use has remained unchanged 53%. Although Leith has a lot of takeaway businesses, it still only represents 8% of units and is similar to other centres. The same issue applies to betting shops which are also a similar percentage to other town centres. Despite the higher number of these types of non-retail uses, there is no evidence of any clustering likely to impact on wellbeing. However, it should be noted that there is an area of restriction adjacent to the south of the town centre as identified in the Council's Guidance for Businesses as it is residential in character but there is a high concentration of hot food takeaways,

public houses and entertainment venues. This matter is considered in further detail below.

With a vacancy rate of 8%, the town centre is higher than some of the town centres, but it is still considered a modest level. Overall, the data shows that the town centre is in reasonable health largely unaffected by broader retail trends. There are 21 food stores in the town centre including a large supermarket, a medium sized supermarket, a budget supermarket, a number of small, ‘metro’ size supermarkets, various independent traders and some speciality stores some of which are selling authentic imported food.

The public life street assessment shows a mix of place function scores with some aspects moderately positive, for example its aesthetic quality and detailed design, and some scoring low such as a need to address a lack of vegetation/ planting throughout the centre and little shelter from poor weather. As a movement route, the centre scored highly especially where there have been improvements. Generally there is good lighting and opportunities to enjoy views up Leith Walk. Wider footpaths, particular where improvements have been made, allows shopfronts to be appreciated and creates space that feels at a human scale and less dominated by cars. The guidance sets out three overarching aims as part of a vision for the town centre; one, maximising the town centre’s contribution to an active public street life, encouraging people to spend longer in the town centre by enhancing the public realm. Two, facilitating movement and increase footfall by prioritising pedestrians and cyclists over cars. Three, creating a destination that provides a vibrant mix of shopping and other town centre services for residents and visitors.

Leith has been subject of an extensive road and public realm renewal programme (Leith Programme) consisting of six phases which has addressed many of the issues identified in the guidance. It was focussed on delivering high quality public realm, through a number of initiatives to improve walking, cycling, public transport and street life in Leith. The tram project has also delivered public realm improvements along the length of Leith Walk. This improvement scheme has helped to address the issues raised in the public life street assessment although some issues remain valid.

Nicolson Street/Clerk Street

Nicolson Street/Clerk Street Town Centre is located on a main arterial route leading south from the Old Town through the inner suburb of the Southside. It extends 1.7km from North Bridge south to the junction of Newington Road and Salisbury Place. The Town Centre lies with the Old Town and South Side Conservation Areas. The area is densely populated with approximately 35,545 people within ten minutes of the Town Centre. It is a diverse and lively area with a number of active evening uses including the Festival Theatre.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	169	26	55	4	14	21	21	6	0	9	325
Floorspace	29,133	4,461	8,604	640	2,808	1,879	NA	1,081	0	875	49,481
Percentage	52%	8%	17%	1%	4%	6%	6%	2%	0%	3%	100%

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	172	25	65	3	15	19	20	2	0	8	329
Floorspace	28,731	3,436	10,265	565	2,072	1,789	NA	443	0	753	48,054
Percentage	52%	8%	20%	1%	5%	6%	6%	1%	0%	2%	100%

Figure 19.13: Profile of uses in Nicolson Street/Clerk Street Town Centre 2015 vs 2024

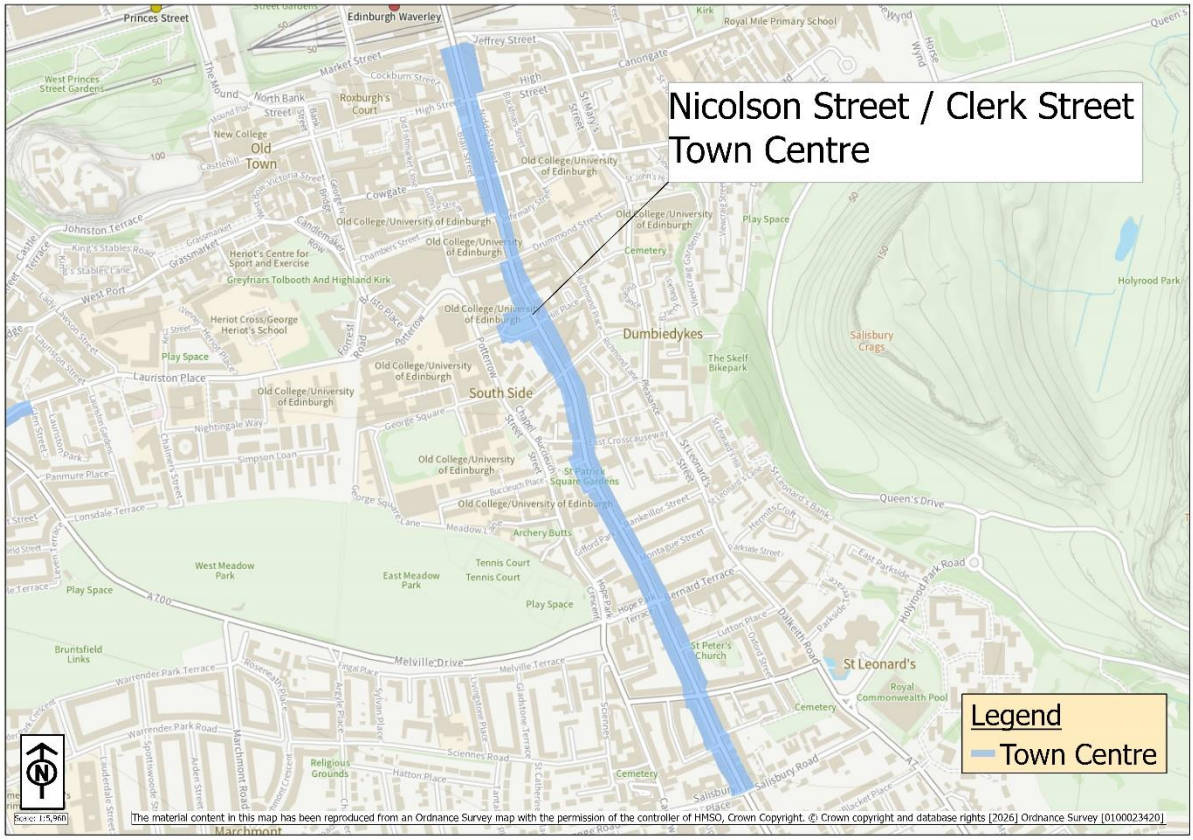


Figure 19.14: Nicholson Street/Clerk Street Town Centres

Data from the retail survey shows there has been some changes in the Nicolson Street/Clerk Street Town Centre. A review of the town centres in the context of preparing City Plan 2030 resulted in some minor changes to the town centre boundary which has increased the overall number of units. Although there has been an increase in the number of units in shop use, the percentage is unchanged. There has been a noticeable increase in the number of units in restaurant use and the percentage has risen to 20% from 17%, which is higher than all the other town centres. This reflects the character of Nicolson Street, which is close to the University of Edinburgh and the Old Town with students and tourists looking to dine out. Other uses and leisure uses have dropped a little and there has been a slight increase in vacancy levels but only to 5%.

Although there are a lot of hot food takeaways, they still only represent 6% of uses and there has been a drop in the number since 2015. However, there is evidence of a clustering of non-retail uses likely to cause impacts on well-being. This is already recognised by the Council and it should be noted that part of the town centre is identified as an area of restriction in the Council's Guidance for Businesses as the area has a residential character but there is also a high concentration of hot food takeaways, public houses and entertainment venues. This matter is considered in further detail below. Nevertheless, the drop in the number of takeaways is consistent with the intentions of the guidance and is a positive development. Overall, the data shows the town centre looks to be in robust health unaffected by broader retail trends. There are 21 food stores including seven small supermarkets, one of which is a budget retailer, various independents, and seven speciality shops some of which are selling authentic imported food.

The public life street assessment shows a mix of strengths such as a strong local community, high footfall, good public transport and access to natural space, but also weaknesses such as narrow footpaths and pinch points, traffic and air pollution, and poor-quality materials. Some opportunities have been identified to improve the town centre such as improving cross connections, enhancing spaces, improving conditions and facilities for cyclists. Most of the problems identified remain ongoing concerns.

Portobello

Portobello Town Centre is located to the east of the city centre and stretches from Flint Terrace to the west to Abercorn Park in the east. Portobello High Street is an arterial route into Edinburgh city centre and serves as the main shopping and commercial street for Portobello. Almost all of the town centre falls within Portobello Conservation Area. The promenade and beach play a key role in giving Portobello its unique setting and identity. It has a lower population within ten minutes of the town centre, approximately 11,101. The main anchor supermarket is located off Bath Street and not visually connected with the main high street. A second supermarket with car park is located at the west end of the town centre.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	88	20	8	0	11	11	6	3	0	7	154
Floorspace	9,535	2,512	757	0	742	1,570	NA	384	0	372	15,872
Percentage	57%	13%	5%	0%	7%	7%	4%	2%	0%	5%	1

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	97	18	12	0	4	11	6	2	0	22	172
Floorspace	11,248	2,305	1,278	0	503	631	NA	283	0	1,128	17,376
Percentage	56%	10%	7%	0%	2%	6%	3%	1%	0%	13%	100%

Figure 19.15: Profile of uses in Portobello Town Centre 2015 vs 2024

Figure 19.16: Portobello Town Centres

Data from the retail survey shows there has been some changes in Portobello. A review of the town centres in the context of preparing City Plan 2030 resulted in some changes to the town centre boundary extending it to the west to include a discount convenience retailer and a retail frontage. This has caused an increase in the number of units in shop use, which now represent 56% of all units. There has also been an increase in the number of units in restaurant use and the percentage has risen to 7% from 5%. There has been a small drop of units being used for professional services and betting, but takeaways and pubs are unchanged. There is no evidence of clustering effecting the wellbeing of communities. Most importantly, vacancy levels have dropped to just 2% which is the lowest of all the town centres. As a result, the data shows the town centre looks to be in robust health unaffected by broader retail trends. There are 10 food stores including a supermarket, a budget supermarket, two small supermarkets, various independents, and two speciality shops.

In spring 2023, the Council engaged with the local community as part of a Portobello town centre project. The purpose of the project was to involve the community in a street design process at an early stage in order to identify priorities for the town centre and the wider area in the context of living well locally. The engagement process involved an online survey, a workshop at the local library and a workshop with pupils at the local high school. The online survey aimed to understand what people thought was important across the streets and public spaces, identify

opportunities to improve access to local facilities and amenities, identify anything that limits walking, wheeling and cycling, and identify opportunities to improve the public realm.

The two public workshops that were held where key themes emerged, in particular that the area was not easy to move around with traffic and conflicts between pedestrians and cyclists on the promenade being highlighted. There were also strong calls for improvements to public transport. However, there was also clear positive points raised, in particular the strong sense of belonging and local identity of Portobello.

The previous public life street assessment shows some overlaps with the findings of the workshops held. They show a mix of strengths such as a village feel with presence of civic buildings acting as architectural landmarks, high proportion of independent shops, and promenade and beach creating a destination, but also weaknesses such as poor wayfinding from the Promenade to the High Street, limited crossing points, narrow street section between Bath Street and Windsor Place creating a pinch point and traffic impacts. Some opportunities have been identified to improve the town centre such as better links between the Promenade and the High Street, better use of space outside Town Hall, and protection from climate and traffic. Although this assessment was done a number of years ago, the recent work shows that the analysis and aims remain valid and are ongoing concerns.

Stockbridge

Stockbridge Town Centre is located north of the city centre with regular bus services linking it to the city centre. Stockbridge has retained much of its historic village character and atmosphere, comprising of small shop units and a variety of house types including colonies and terraces. For this reason, it is not as densely populated as some of the other town centres approximately 18,053 people within a ten-minute walking distance. The town centre lies with the New Town Conservation Area.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	110	15	28	0	12	7	7	1	0	1	181
Floorspace	11,551	1,616	2,681	0	906	444	NA	157	0	46	17,401
Percentage	61%	8%	15%	0%	7%	4%	4%	1%	0%	1%	100%

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	127	7	32	0	10	5	7	0	0	7	195
Floorspace	11,368	1,168	3,553	0	1,661	298	NA	0	0	554	18,602
Percentage	65%	4%	16%	0%	5%	3%	4%	0%	0%	4%	100%

Figure 19.17: Profile of uses in Stockbridge Town Centre 2015 vs 2024

Figure 19.18: Stockbridge Town Centre

Data from the retail survey shows there has been some changes in Stockbridge. A review of the town centres in the context of preparing City Plan 2030 resulted in some minor changes to the Town Centre boundary, extending it to the west to include a new parade of shop units and extending it to the east to include an existing frontage which was previously identified outside the boundary. The new units have increased the total to 195. This change mostly explains the increase in shop units and the rise to 65%. There has also been a slight decrease in the number of takeaways and the loss of the single betting shop. The number of pubs remain unchanged. Despite the rise in the total number of units, the vacancy rate has dropped to 5%. There is no evidence of the clustering on non-retail uses likely to impact on wellbeing or communities. As a result, like the other centres, the data shows the town centre looks to be in robust health unaffected by broader retail trends. There are seven food stores in the town centre including a medium sized supermarket, a small ‘metro’ sized supermarket, some independents, and two speciality stores.

The public life street assessment shows a mix of strengths such as a friendly village atmosphere and strong sense of community, nearby parks and walking routes, positive architectural and historic character with features of interest. The identified weaknesses are narrow pavements and prevalence of bollards hindering movement, priority of vehicles over pedestrians, cyclists and place function, lack of cycle

facilities and parking being prioritised throughout the town centre. Some opportunities have been identified to improve the town centre such as making the connection to the Water of Leith clearer to enhance wayfinding, removing bollards and extending the public real at key points. Ten principles were identified in order to achieve a vision for Stockbridge. Although this study was done a number of years ago, the analysis and aims still remain valid.

Tollcross

Tollcross Town Centre is located along a main arterial route leading south from the City Centre. The area is densely populated with over 30,378 people living within ten minutes walking distance of the town centre. There are also frequent bus services providing quick and sustainable access to the city centre. The south and north ends of the Town Centre are located within Marchmont, Meadows and Bruntsfield and the West End Conservation Areas respectively.

Year 2015	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	81	21	21	1	6	5	9	3	0	0	147
Floorspace	13,549	3,180	2,772	283	589	391	NA	508	0	0	21,272
Percentage	55%	14%	14%	1%	4%	3%	6%	2%	0%	0%	100%

Year 2024	Shop	Professional Services	Café/Restaurant	Leisure	Vacant	Takeaways	Pubs	Betting Shops	Loan Shops	Other	Total
No of Units	79	18	25	1	9	5	9	3	0	1	150
Floorspace	11,901	3,170	2,979	284	1,012	434	NA	313	0	NA	20,093
Percentage	53%	12%	17%	1%	6%	3%	6%	2%	0%	1%	100%

Figure 19.19: Profile of uses in Tollcross Town Centre 2015 vs 2024

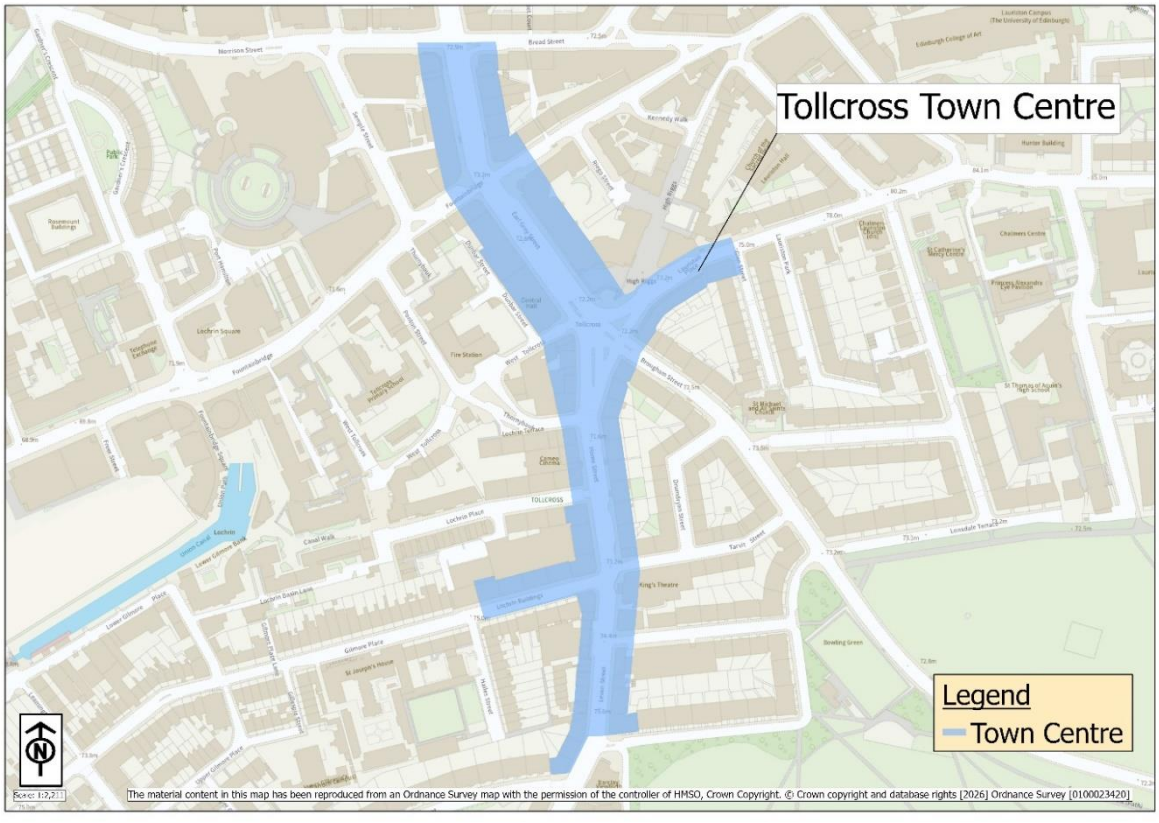


Figure 19.20: Tollcross Town Centre

Data from the retail survey shows there has been some changes in Tollcross. There has been a loss of two shops but despite this, they still form over 50% of all units. Professional services have also dropped a little. In contrast, the number of units in restaurant use has risen from 14% to 17%. Hot food takeaways and pubs have remained static and there has been the loss of one betting shop. There is no evidence of a clustering of non-retail uses likely to affect the wellbeing of communities as they are distributed throughout the centre. However, it should be noted that Tollcross falls within an area of restriction, as identified in the Council's Guidance for Businesses, where additional hot food takeaways will only be accepted if there is no adverse impact on existing residential amenity. This matter is considered in further detail below. The vacancy rate has risen a little from 4% to 6% but is still well below a level that would raise concerns. As a result, like the other centres, the data shows the town centre looks to be in robust health unaffected by broader retail trends. There are eight food stores in the town centre including three small supermarkets, various independents and two speciality shops selling authentic imported food.

The public life street assessment shows a mix of strengths such as proximity to larger open spaces, high footfall and vibrant, young, diverse and multi-cultural community, but also weaknesses such as lack of planting and street trees, poor pedestrian priority at crossings, large bins, insufficient bike parking and uneven pavement surfaces. Some opportunities have been identified to improve the town centre such as enhancing pedestrian and cycle connections, additional seating and trees, redesign of Tollcross junction and de-cluttering of the town centre. Although this study was done a number of years ago, the analysis and aims remain valid.

Proposed Town Centres

City Plan 2030 supports the creation of new housing led development in West Edinburgh in the form of an urban extension supporting economic development opportunities whilst introducing a balanced mix of uses that promote healthy, sustainable lifestyles and a strong sense of place through the 20 minute neighbourhood principle. The Council has prepared the West Edinburgh Placemaking Framework as planning guidance that articulates the vision and helps to shape the future of development of West Edinburgh as required by Place Policy 16 in City Plan 2030. In order to achieve successful 20 minute neighbourhoods, the guidance requires a network of centres to be incorporated within the new urban extension, including a new Gogar Town Centre and a number of local centres.

The Proposed Plan will have to review and consider the role of town centres and their boundaries, and whether there is a need to review the policy approach to reflect changes in circumstances either individually or collectively particularly give the permitted development rights changes. It will also have to review the impacts of change caused by new development and formally identify new town centres. This review will also include consideration of any trends relative to clustering of non-retail uses likely to impact on wellbeing.

Local Centres

Local centres make an important contribution to local living and 20 minute neighbourhoods. The data shows that the overall or cumulative vacancy rate for local centres is just 8.2% in 2024, a slight increase from 2015 when it was 7.5%. This is similar to the average vacancy rate which has risen from 6.7% to 8%. Although these average figures disguise the fact that the vacancy rate varies from zero to 33%, it should be noted that the number of commercial units in local centres can be quite low i.e. just a few units, resulting in more dramatic swings in vacancy levels if a small number of units become vacant. Furthermore, 61% of the local centres have seen an improvement in the vacancy rate or it has remained unchanged since 2015. Shop units continue to comprise 65.9% of units, café and restaurants 7.7% and other uses 17%, showing there is a diverse mix of uses in local centres with a strong retail presence.

All of the local centres have at least one grocery store selling fresh food with the exception of Balgreen Road, Buckstone Terrace, Drumbrae, Ferry Road East, Restalrig Road and Queensferry centre. However, these centres all have a grocery shop or supermarket within a ten minute walk of the local centre. 82% of local centres have a hot food takeaway or betting shop, and in many local centres there is more than one takeaway. However, only three local centres show signs of a possible clustering of such uses with the potential to have impact on local well-being. This is examined in more detail below. Although there are localised problems of higher vacancy levels that is to be expected as a result of turnover in the marketplace with businesses closing and new ones opening, and it should also be noted that the audit represents a snapshot in time. Overall, the Council considers that local centres are showing resilience despite changing retail patterns.

The Proposed Plan will have to review and consider the role of local centres and their boundaries, and whether there is a need to review the policy approach to reflect changes in circumstances either individually or collectively particularly give the PDR changes. In addition, where new residential development is planned, for example in West Edinburgh, there is expected to be new local centres created in order to deliver living locally objectives. The Council will need to consider whether to identify these during the preparation of the Proposed Plan.

Outwith the local centres, there are numerous individual shops including some freestanding supermarkets and small shopping parades providing convenience shopping and associated local services complementary to other designated centres which contributes to local living objectives.

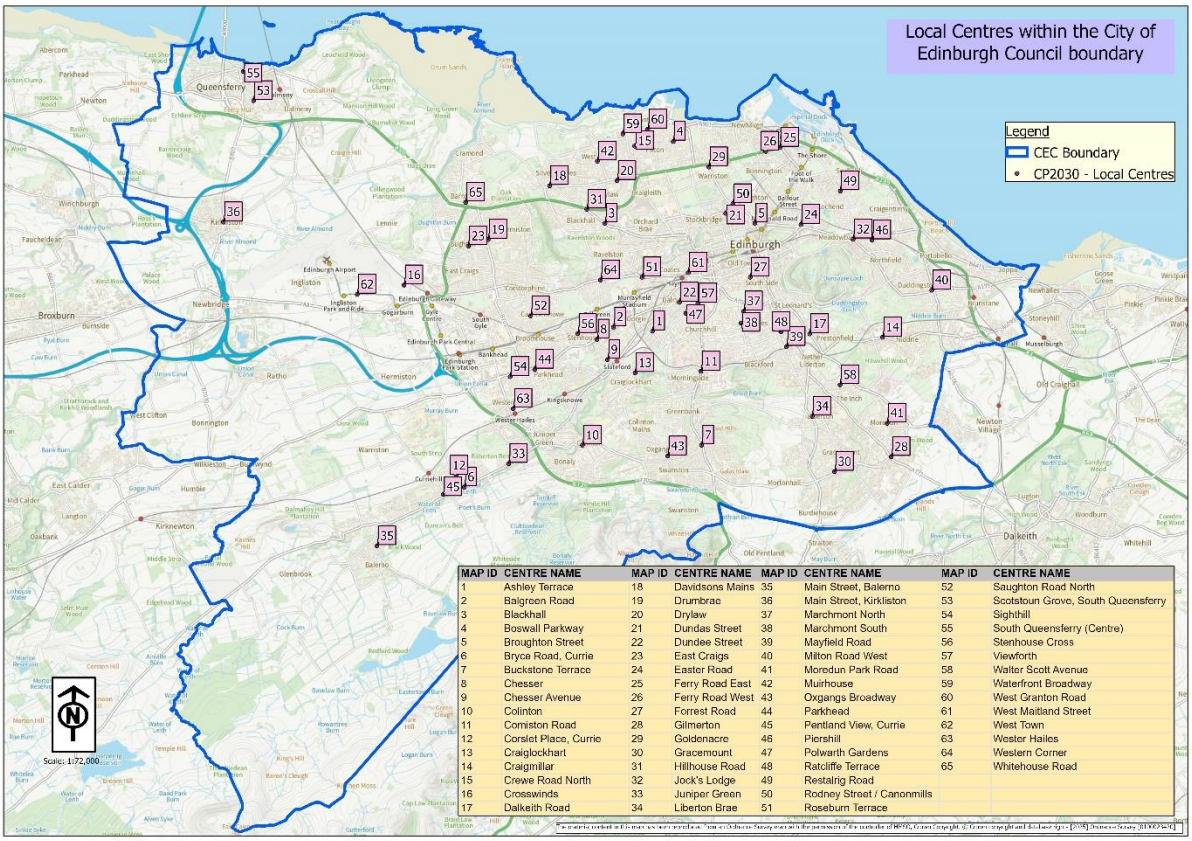
Local Centre	All Units	Shops	Food	Café	Other uses	Vacancy rate (%) 2015	Vacancy rate (%) 2024
1. Ashley Terrace	13	13	1	0	1	0	0
2. Balgreen Road	15	9	0(g*)	1	5h	13.3	0

3. Blackhall	19	11	1	1	5h	0	10.5
4. Boswall Parkway	9	5	2(s)	0	3h	11	11
5. Broughton Street	69	42	5	11	11h	5.5	7.2
6. Bryce Road, Currie	5	3	1	1	1h	0	0
7. Buckstone Terrace	10	9	0(g*)	1	0	0	0
8. Chesser	13	4	1	2	3h	8.3	23
9. Chesser Avenue	15	13	4(s+)	1	0	0	6.6
10. Colinton	24	17	1	2	4h	4.3	4.1
11. Comiston Road	29	21	1	1	5h	0	7
12. Corslet Place, Currie	4	2	1	1	1	0	0
13. Craiglockhart	7	6	1	0	1h	10	0
14. Craigmillar	39	27	7(s)	2	8hb	17.6	5
15. Crewe Road North	11	9	3(s)	0	1	9	9
16. Dalkeith Road	22	13	1	1	4h	22.7	18
17. Crosswinds (Proposed)							
18. Davidsons Mains	32	21	2(s)	1	7h	3	0
19. Drumbrae	10	5	0(g*)	0	2hb	0	30
20. Drylaw	22	12	4	0	5hb	8.7	18
21. Dundas Street	21	11	1	5	3h	10	9.5
22. Dundee Street	17	12	2	3	1h	0	5.9
23. East Craigs	4	2	1	0	2h	0	0
24. Easter Road	153	111	10(s+)	6	20h	11	10.4
25. Ferry Road East	22	14	0(s*)	0	3h	13.6	22.7
26. Ferry Road West	27	18	3	2	5hb	7.4	7.4
27. Forrest Road	41	23	5	10	6h	0	4.9
28. Gilmerton	19	14	3(s+)	0	5h	5.5	0
29. Goldenacre	35	28	3	2	4h	2.8	2.8
30. Gracemount	13	9	2(s)	0	4h	0	0
31. Hillhouse Road	21	17	1	1	2h	4.5	4.7
32. Jock's Lodge	18	12	1	0	5h	5	5.5
33. Juniper Green	18	12	1	2	3h	0	5.5
34. Liberton Brae	10	8	1	0	1h	0	10
35. Main Street, Balerno	12	8	1(s)	0	4h	8.3	0
36. Main Street, Kirkliston	7	3	1	1	2h	12.5	0
37. Marchmont North	49	26	3	6	10h	9.6	10.2
38. Marchmont South	30	21	2	4	3h	10	3.3
39. Mayfield Road	11	7	1	1	3h	9	0
40. Milton Road West	10	7	2	0	3h	0	0
41. Moredun Park Road	6	4	2	0	0	43	33
42. Muirhouse	12	8	3	0	0	17.3	33
43. Oxgangs Broadway	14	10	3(s)	0	3hb	7	7

44. Parkhead	13	9	3(s)	1	3h	23	0
45. Pentland View, Currie	9	5	1	0	4h!	0	0
46. Piershill	12	7	2(s)	1	4hb	0	0
47. Polwarth Gardens	19	12	1	2	2h	9.5	15.8
48. Ratcliffe Terrace	21	13	1	2	2	4.7	14.3
49. Restalrig Road	8	6	0(g*)	0	2h	12.5	0
50. Rodney Street / Canonmills	59	38	1	7	9h	11.8	5.1
51. Roseburn Terrace	34	24	3(s)	2	7h	2.9	2.9
52. Saughton Road North	14	11	1(s)	0	3hb	0	0
53. Scotstoun Grove, South Queensferry	7	2	1	0	4h	0	14.3
54. Sighthill	14	8	2	0	4hb!	0	14.3
55. Queensferry (Centre)	37	24	0(s*)	8	1h	5.5	10.8
56. Stenhouse Cross	11	7	1	1	3h	9	0
57. Viewforth	16	10	1	0	3	17.6	18.75
58. Walter Scott Avenue	14	8	3	0	5hb!	7.1	0
59. Waterfront Broadway	1	1	1(s)	0	0	0	0
60. West Granton Road	18	12	3(s)	0	6hb	0	0
61. West Maitland Street	24	14	2	6	2	8.3	8.3
62. West Town (proposed)							
63. Wester Hailes	36	22	3(s)	1	2h	8.3	25
64. Western Corner	17	12	1	1	4h	5.9	0
65. Whitehouse Road	7	4	1	0	1h	0	28

s Supermarket
s+ more than one supermarket
g* Grocery shop within ten minutes walk
s* Supermarket within ten minutes walk
h hot food takeaway/s
b betting shop
! Possible clustering of non-retail uses with impact on well being

Figure 19.21: Retailing in Local Centres



MAP ID	CENTRE NAME	MAP ID	CENTRE NAME	MAP ID	CENTRE NAME	MAP ID	CENTRE NAME
1	Ashley Terrace	18	Davidsons Mains	35	Main Street, Balerno	52	Saughton Road North
2	Balgreen Road	19	Drumbrae	36	Main Street, Kirkliston	53	Scotstoun Grove, South Queensferry
3	Blackhall	20	Drylaw	37	Marchmont North	54	Sighthill
4	Boswall Parkway	21	Dundas Street	38	Marchmont South	55	South Queensferry (Centre)
5	Broughton Street	22	Dundee Street	39	Mayfield Road	56	Stenhouse Cross
6	Bryce Road, Currie	23	East Craigs	40	Milton Road West	57	Viewforth
7	Buckstone Terrace	24	Easter Road	41	Moredun Park Road	58	Walter Scott Avenue
8	Chesser	25	Ferry Road East	42	Muirhouse	59	Waterfront Broadway
9	Chesser Avenue	26	Ferry Road West	43	Oxgangs Broadway	60	West Granton Road
10	Colinton	27	Forrest Road	44	Parkhead	61	West Maitland Street
11	Comiston Road	28	Gilmerton	45	Pentland View, Currie	62	West Town
12	Corslet Place, Currie	29	Goldenacre	46	Piershill	63	Wester Hailes
13	Craiglockhart	30	Gracemount	47	Polwarth Gardens	64	Western Corner
14	Craigmillar	31	Hillhouse Road	48	Ratcliffe Terrace	65	Whitehouse Road
15	Crewe Road North	32	Jock's Lodge	49	Restalrig Road		
16	Crosswinds	33	Juniper Green	50	Rodney Street / Canonmills		
17	Dalkeith Road	34	Liberton Brae	51	Roseburn Terrace		

Figure 19.22: Map of Local Centres

Commercial Centres

Edinburgh's commercial centres make an important contribution to the Edinburgh economy and support economic growth. They provide a source of employment, and goods and services for residents, local communities, and visitors. There are seven shopping malls and retail parks of varying size and character located around the city. Some are located on the periphery of the city such as Newcraighall and the Gyle and others are located within the urban area close to the residential population such as Cameron Toll and Meadowbank. The details are as follows:

Cameron Toll: Enclosed shopping centre that was built in 1984. It consists of 40 units and includes a superstore (selling comparison and convenience goods), a discount food store, a petrol station, with a drive through restaurant and coffee shop in the car park. It is located in south-east Edinburgh on a major transport intersection and is well served by bus services.

Craigleith: A retail park that opened in 1996. It consists of 15 units and includes a mix of bulky goods, fashion, a stand-alone superstore, discount food store, petrol station and drive through restaurant. It is located in north-west Edinburgh, in a residential area.

Hermiston Gait: A retail park that opened in 1995, originally with a bulky goods focus with restriction on total floorspace. It consists of 10 shop units and includes a superstore, a discount food store, various other retailers and small food and drink units. It is located on the periphery of the city to the west next to the City Bypass A720 and the M8. It has a limited bus service and walking catchment area. However, the site serves as a gateway to rail and tram stops.

Meadowbank: A smaller urban retail park which opened in 1997. It consists of 10 units and includes supermarket and discount food stores, homeware and clothing stores, a drive through restaurant and coffee shop. The food stores take up two units each. It is located to the east of the city centre within a heavily populated residential area and is well serviced by bus services.

Newcraighall/The Jewel: One of the largest and highest revenue generating retail parks in the UK which opened in 1989, which is locally known as Fort Kinnaird. It consists of 85 units and includes a superstore, retail warehouses, a variety of high street retail businesses, a cinema and various café/restaurants some of which have drive-through facilities. It is located to the periphery of the city to the east next to the A1. It has regular bus services despite the location but poor access to rail via Newcraighall Station. There is limited walk-in catchment, however, the centre provides facilities for a wide range of customers over an extensive area, not just within Edinburgh but also from East Lothian, Midlothian and beyond.

Ocean Terminal: Enclosed shopping centre built in 2001 with 87 units. It includes various high street retail units, visitor access to the Royal Yacht Britannia exhibit, restaurant/cafes and cinema over three floors. The centre is being subject to major alteration and refurbishment. Part of the centre and its north car park has been demolished and is being rebuilt as residential development with commercial (class 1 to 3) uses on the ground floor. It is located to the north of the city at the Port of Leith. It has regular bus services (terminus) and is next to the tram route and stop.

Gyle: Enclosed shopping centre built in 1993. It consists of 64 units and includes a supermarket superstore, a variety of ‘high street’ retail businesses and food court. It is located to the periphery of the city just to the east of the city bypass. It has regular bus services (terminus) and is next to the tram route and stop, with pedestrian links to rail via the Gateway station.

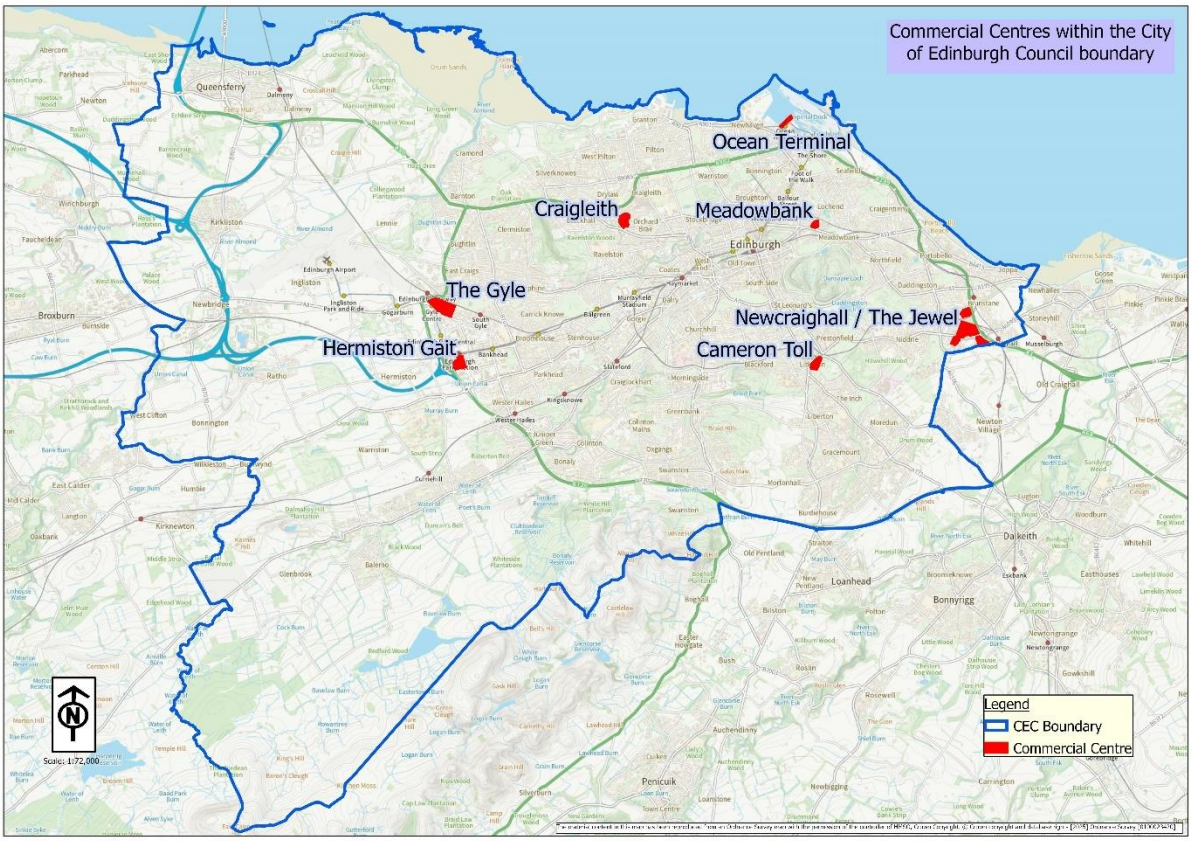


Figure 19.23: Map of Commercial Centres

Vacancy Rates of Commercial Centres

The data from the Council's retail study gives a good overview of the state of health of the commercial centres.

Cameron Toll currently has no vacant units at all. Most of the units are used for comparison shopping with two used for convenience food stores one of which is a superstore. There are only three units in non-shop uses, specifically two professional services (banks) and one café/coffee shop. Pre application discussions are taking place at present in the context of a complete reconfiguration of the centre, and the introduction of additional uses such as residential development. Consent has previously been granted for a hotel and a cinema but they have yet to been delivered and may be reconsidered in the context of the reconfiguration.

Craigleith commercial centre has no vacant units either. Virtually all of the units are used for shopping use. The majority of businesses are conventional 'high street' retailers selling comparison goods but three units are selling bulky goods. As stated above two units are used for convenience retail. There is only one unit which is operating as a non-shop use (gym).

Hermiston Gait is currently fully occupied. Of the 10 units, three are selling bulky goods. Two of the units are occupied by supermarkets selling convenience retail and the rest are well known 'high street' brands selling comparison goods.

Meadowbank currently has just one vacant unit. Of the 10 units, four are used by the two supermarkets selling convenience goods, one of which is a discount store. The rest of the units sell mixed durable or comparison goods.

Newcraighall currently has six vacant units representing a vacancy rate of 7%. There are 14 restaurants/cafes which represents 16% of the total. There is a large supermarket at the Jewel which represents the only dedicated convenience store. There are a couple of units being used for leisure including a gym and a cinema and similarly two units providing professional services (travel agents). The rest of the shop units sell comparison goods, and although four of these sell bulky goods, the majority are occupied by familiar 'high street' brands. Although there are some vacant units at Newcraighall, it is one of the busiest and most successful commercial centres in the UK and a degree of turnover in businesses is to be expected.

Ocean Terminal is currently in a state of transition with numerous vacant units. The centre has had various problems since it was built due to a lack of customers and their associated expenditure, resulting in poor turnover and vacant units. In part this is due to a timing issue as the centre opened before significant waterfront redevelopment with new residential development along with proposals for the redevelopment of the Port of Leith not progressing as was envisaged. In addition, the loss of the department store (reflecting a national retail trend) which acted as an anchor store, has also had a negative impact in terms of encouraging visitors to the centre. Although a lot of new residential development has now been built and more is to follow, in theory helping to support the centre, it is not clear at this time whether this will be sufficient to reinvigorate the centre. The owners of the centre have begun to implement a refurbishment of the centre involving partial demolition and conversion of the north end to residential properties. The centre does benefit from being on the route of the Edinburgh tram with a stop outside the centre and with Royal Yacht Britannia extending its lease by 25 years and the completion of the Port of Leith Distillery so these factors may help its fortunes.

The Gyle has nine vacant units representing a 14% vacancy rate, which is the highest out of all the commercial centres, with the exception of Ocean Terminal which is an outlier due to its refurbishment. There are five units being used for professional services, and 44 units being used for comparison retail, one of which is bulky goods, which represents 68% of all units. The remaining units are food outlets in the food court and the main supermarket selling convenience goods. The Gyle commercial centre has not been as successful as most of the others, reflected in the number of vacant units, but that may well change as a result of the extensive new residential development that is being brought forward in West Edinburgh as part of a major allocation in the City Plan 2030, which will increase available expenditure in that area.

NPF4 states in Policy 28 Retail that new retail proposals will be supported in commercial centres if they are allocated as sites suitable for new retail development

in the LDP. As the evidence in retail study shows, there is not expected to be a need for further comparison retail floorspace over the next ten years under the 'low' forecast as a result of online shopping trends, and even if there was the need for further floorspace it suggests that in order to meet the city's growing needs it should be located in the city centre, which will protect its important retail role, as expansion of retail floorspace in peripheral locations is likely to either draw expenditure away from the city centre or draw in expenditure more from surrounding council areas. This evidence will be of importance in preparing the Proposed Plan, in terms of deciding the appropriate approach to new retail development in commercial centres.

The City Plan 2030 introduced a new policy approach with regard to commercial centres by supporting alternative uses such as housing, office and hotel development as part of any future development, in order to take advantage of the fact that they are important focal points for shopping, leisure and community facilities. Through redevelopment, the Council considers housing can complement existing retail floorspace and utilise available land to create sustainable mixed-use communities.

Clustering of non-retail uses

NPF4 requires LDPs to be informed by evidence on where the clustering on non-retail uses may be having an adverse impact on the wellbeing of communities. Uses that may affect wellbeing are betting shops, high interest money lending premises and hot food takeaways. The over-provision and clustering of betting shops and money lending premises led to changes to the permitted development rights in 2017 and the Scottish Government removed them from class 2 of the Use Classes Order on the grounds of their social impacts and negative impacts on town centres. Subsequently, the Scottish Government made a further change to permitted development rights in March 2023 when a new Class 1A was introduced merging former Class 1 (shops) and Class 2 (financial, professional and other services). Betting shops and money lending are not within this revised use class and are 'sui generis' – uses which do not fall within a specified class.

The clustering of hot food takeaways can be a concern in terms of the impact on residential amenity and impact on health. The Council's existing Guidance for Businesses identifies a number of areas of restriction to protect residential amenity from late night activity (Figures 19.29 and 19.30) including hot food takeaways but also due to concentrations of public houses and entertainment facilities where there is a risk of further impacts on residential amenity at night if additional premises are granted consent. These are centred on the Tollcross/Lothian Road, Bread Street/Grassmarket, South Clerk Street/Nicolson Street, and Leith Walk/Broughton Street.

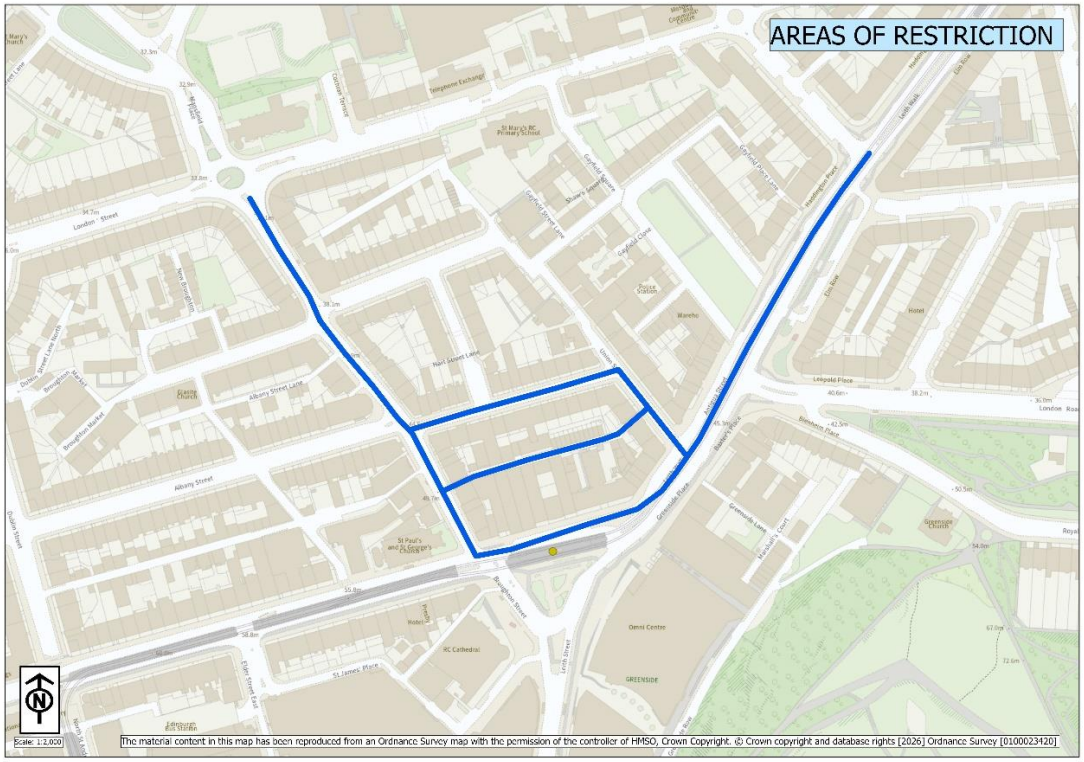


Figure 19.24: Areas of restriction in the city centre

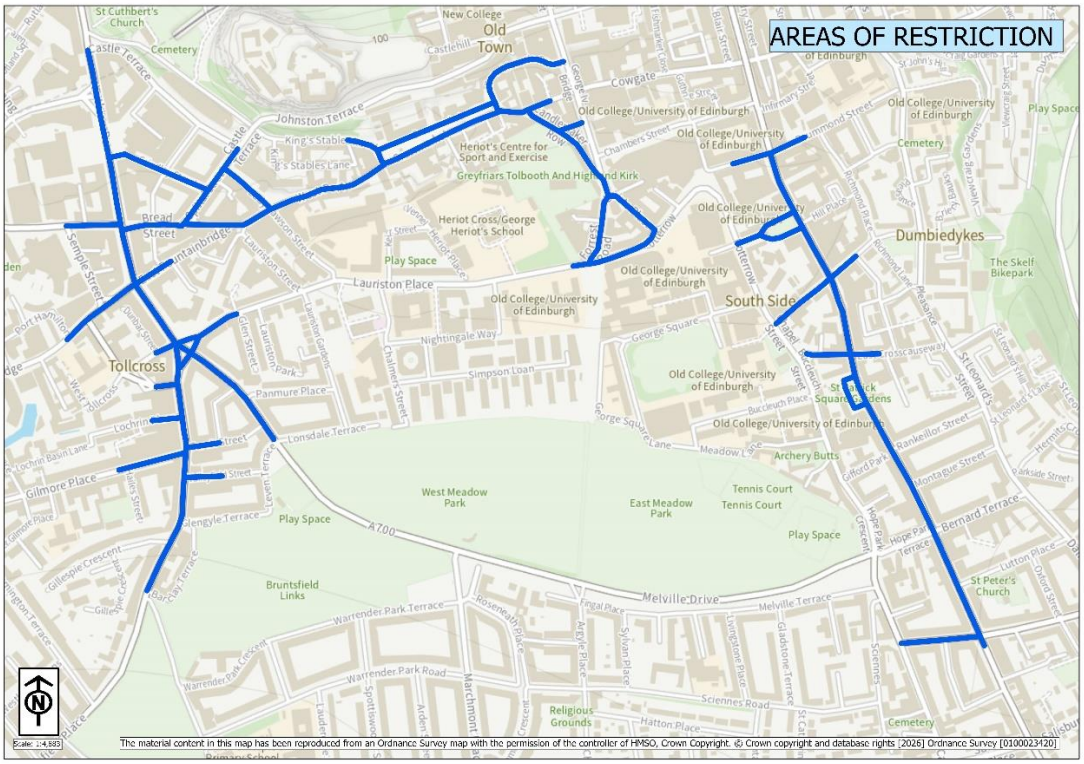


Figure 19.25: Areas of restrictions in Southside and Tollcross

In these areas, new proposals will only be accepted if there will be no adverse impact upon existing residential amenity and where acceptable hours of operation

will be restricted. The previous evidence set out regarding town centres shows that these types of uses form a small percentage of units in the relevant town centres, however, the key issue is whether there is any evidence of clustering. Maps have been prepared to show possible areas of clustering outwith the existing areas of concern.

Although all of the town centres have hot food takeaway services, betting shops were less common. There were no high interest money lending shops at all. With regard to local centres, there were three centres which showed some signs of clustering: Sighthill, Walter Scott Avenue and Pentland View Court.

Sighthill Local Centre (Figure 14) has three takeaways and one betting shop, and this represents 28% of all units in this small centre. The centre is very small and therefore clustering is more obvious despite the percentage being less than a third. Walter Scott Avenue (Figure 15) has five takeaways and one betting shop and this represents 42% of all units. This centre is a small straight parade of shops and therefore clustering is more prevalent. Lastly, Pentland View Court (Figure 16) has four takeaways which represents 44% of all units. Again, this is a tight group of units which makes clustering is more obvious.

Figure 19.26: Sighthill Local Centre

Figure 19.27: Walter Scott Avenue Local Centre

Figure 19.28: Pentland View Local Centre

The number and clustering of these facilities will continue to be monitored as the plan is prepared. The Proposed Plan will have to consider whether there is any requirement for place based or LDP wide policies and approaches to address any

existing or future clustering of uses, within existing centres or elsewhere in the LDP area.

Drive Through Locations

There are a total of 21 drive-through restaurant facilities distributed across Edinburgh as shown on Figure 19.29. Half of the facilities are located in existing commercial centres. But two are located within existing town centres, and nine are located in out-of-centre locations. All of the café/restaurants, with one exception, also offer dine in facilities as well. Drive-through restaurants encourage private vehicle trips and could potentially have negative effects on local living by encouraging unsustainable trips to town, local centres and out of centre locations. NPF4 requires LDPs to consider, and if appropriate, identify any areas where such facilities may be acceptable.

Figure 19.29: Drive-through outlets in Edinburgh

The Council will have to consider in preparing the Proposed Plan whether there are any locations where further drive-through facilities would be acceptable, and how the Plan can guide future planning application decisions.

Location	Designated Centre	Operators
Builyeon Road	N	McDonalds
Cameron Toll Commercial Centre	Y	McDonalds, Costa
Corstrorphine Town Centre	Y	McDonalds
Craigleith Commercial Centre	Y	Burger King
Duddingston Park South	N	Independent cafe
Ferrymuir	N	Burger King
Gorgie/Dary Town Centre	Y	McDonalds

Hermiston Gait Commercial Centre	Y	KFC, Krispy Kreme, Costa
London Road	N	McDonalds
Meadowbank Commercial Centre	Y	KFC, Costa
Milton Link	N	Costa
Newbridge Industrial Estate	N	McDonalds
Newcraighall/the Jewel Commercial Centre	Y	McDonalds
Newcraighall Industrial Estate	N	Burger King, KFC
Seafield Road	N	McDonalds
Telford Road	N	McDonalds
Total	**-**	**21**

Figure 19.30: Drive-through Restaurants/Cafes

City and Town Centre Living

NPF4 states that Planning Authorities should provide a proportion of their local housing land requirements in the city and town centres and be proactive in identifying opportunities to support residential development.

LDP guidance suggests in particular that to inform the Evidence Report as part of auditing town centres and resulting strategies planning authorities should gather evidence on:

- where there are gaps in the supply of existing housing and flats relative to demand
- where there is capacity or opportunities to develop new housing and flats without compromising active use of ground floors and public spaces, or mix of uses in the area
- any related initiatives that would protect and improve residents' quality of life.

In terms of the LDP's network of centres as demonstrated within this topic paper and elsewhere in the evidence report, the eight town centres and the city centre have a predominantly historic townscape, comprising traditional stone tenement buildings, often with commercial ground floor units with floors above utilised for residential, office, hotel and sometimes storage purposes. The town centres in particular have high levels of residential density, reflected in high population figures. They also have a number of listed buildings and many are partly covered by conservation areas or other heritage designations. In all instances these historic townscapes remain relatively intact.

Edinburgh as a city has an extensive urban area and within the urban area, a network of centres exists with each one identified through tightly defined boundaries. City Plan 2030 allocates a number of sites for residential development and whilst they are not located within existing designated centres, their close proximity helps to support their vitality and viability. Opportunities to support residential development within actual centres tends to be limited and takes the form of either a change of use and refurbishment of existing and vacant buildings to residential use or sometimes

through the redevelopment of vacant, underused brownfield sites which are limited in Edinburgh.

In Edinburgh's town centres, shop units are predominantly beneath tenement blocks. However, there are rows or individual modern single storey shop units (often of no architectural or historic merit) which could be redevelopment opportunities for new housing development and flats which retains a commercial use on the ground floor. However, not all shop units will be suitable, as there will be constraints, for example; overlooking, the positioning of adjacent buildings and the provision of appropriate amenity space in terms of the requirements of the Council's design guidance etc.

There are two recent examples where consent has been granted for new residential proposals which serve as useful case studies:

60 metres east of 2 Manse Road, Corstorphine

This site is on the south side of St John's Road and to the east side of Manse Road within the Corstorphine Town Centre. The site previously comprised of single storey retail units, commercial uses, residential and a large parking and service yard to the rear which dated from the 1960s and was demolished. Consent was granted on 25 October 2024 for a mixed-use development (24/01950/FUL) including a care home and ground floor commercial units arranged in an L shaped layout. The commercial units are accessed directly from St Johns Road. The redevelopment offers an opportunity to enhance the character and appearance of the conservation area as the design is more in keeping with the prevailing buildings on the south side of St John's Road with appropriate mass, scale and materials.

265 Morningside Road

This site is on the east side of Morningside Road, within the Bruntsfield and Morningside Town Centre. The site had a single storey building facing onto Morningside Road which rose to two stories at the rear. It dates from the 1960s and was previously used as a post office. Consent was granted on 8 April 2025 for the demolition of the existing building and construction of a new hotel, restaurant and bakery (24/04802/FUL). The new development extends to three storeys and will be more in keeping with the town centre's historic spatial structure and townscape. The contemporary design of the proposal is not considered to have an adverse effect on the essential spatial structure and townscape character of the Morningside Conservation Area.

The Council when preparing the Proposed Plan will need to consider if there is a need to guide proposals for the redevelopment of potential sites within town centres for residential development.

Summary of stakeholder engagement

Key Agency	NHS Lothian
Main views raised	**Draft Topic Papers (Nov 2025):** Supports the recognition of the clustering of non-retail provision likely to have an impact on health and wellbeing such as betting shops, high interest money lending and hot food takeaway and suggest that retailing of alcohol, tobacco and smoking related products should be added. **Final Topic Papers (March 2026):** No further comments made, cornet with sufficiency of evidence and addresses previous comments.
Council response and Implications for the proposed plan	NPF4 policy 27c specifically identifies takeaways, betting shops and loan shops with regard to clustering. All of these uses are now categorised as sui generis, and therefore potential changes of use can be controlled through the planning process. Whilst the provision of alcohol is also likely to have an impact on health, the planning system is unable to control the use of shops for the sale of alcohol. The licensing process is better placed to consider and control over provision and is required to do so by the Licensing Act 2005. Furthermore, the planning system is unable to control sale of tobacco or smoking products. Therefore, the implications for the Proposed Plan are that the Council will explore the best means by which to address existing and future clustering of such uses when preparing the Proposed Plan.
Is the agency content with the evidence?	NHS Lothian have advised: 'With regards the Evidence Report, NHS Lothian Population Public Health Team are pleased to see the extent to which our comments and suggestions have been considered and incorporated. We are in general agreement that there is sufficient evidence provided across the topic papers to effectively support the development of the Local Development Plan.'
Areas of agreement	Topic paper sufficient.
Outstanding issues	There are no outstanding issues.
Actions for proposed plan stage	The Council will continue to work with NHS Lothian (Public Health) during the preparation of the Proposed Plan, in particular on issues relating to health and wellbeing and local living.

Key Stakeholder	Homes for Scotland
Main views raised	**Scoping Stage (May 2025):** No comments directly relevant to this topic. **Draft Topic Papers (Nov 2025):** No comments directly relevant to this topic. **Final Topic Papers (March 2026):** Suggest the Council considers additional evidence on SME Housebuilders, and a Scottish Government blog post on how permitted development rights can help address the housing emergency. While it is noted there are limited housing development opportunities in Edinburgh's town centres, it is important that viability is still considered in this context. If it cannot be demonstrated a site can viably delivered it should not be allocated. Many town and local centre regeneration developments are generally implemented by SMEs. Research has highlighted that the number of SMEs in Scotland is contracting therefore consideration needs to be given to the capacity of the home building industry to develop brownfield land in town or local centres. There may be scope for future conversion of non-residential uses to housing as part of a change of use. Whilst this will be positive for town centre living, this will be windfall housing and cannot contribute to the LHLR. Larger scale housing developments, by way of integration of mixed uses, may be able to create or augment existing 20 minute neighbourhoods which would be compliant with NPF4 aspirations. There are opportunities for mixed use development in and around Edinburgh's town centres. In some instances, existing commercial provision may be sufficient and development is solely residential. In allocating the LHLR, it is vital that CEC factors in marketability and deliverability. This will help ensure housing needs are met, as we seek to address the housing emergency. Enabling HFS members to build homes in

	marketable locations is key to assisting meeting housing targets and ensuring people have access to high quality housing in areas in which they want to live. Alongside aspirations to regenerate town centres, it must be recognised that more home building is beneficial for the economy.
Council response and Implications for the proposed plan	The Council also notes the recommendations in the report commissioned by HFS on SME house builders are for the Scottish Government, the Council does not consider there is a need to include reference to these reports in the evidence report. The Council considers the topic paper addresses the changes to permitted development rights as they currently stand. The issue of viability influences the deliverability of a site. The Council has included the issue of deliverability in the draft site assessment methodology. The Council notes the comments with regard to changes of use representing windfall development. The Council agrees that larger housing developments through inclusion of mixed uses may be able to contribute to 'local living' and that not all development opportunities within the urban environment will be required to contribute to 'local living' depending on access to existing facilities. The Council recognises the economic benefits of house building in the Topic paper on Economy, Business and Industry.
Is the agency content with the evidence?	HFS does not dispute any of the evidence set out in the topic paper, but requires additional evidence and data to be referenced and understood.
Areas of agreement	Not applicable
Outstanding issues	The Council has considered the documents and evidence suggested and considers no further changes are required.
Actions for proposed plan stage	None in relation to this topic paper

Other engagement and matters raised

Economic Needs Study – Retail

As part of the process of preparing the retail study, the consultants engaged with a number of stakeholders including retailers, centre managers, retail agents and representative organisations, including:

- City of Edinburgh Council
- Scottish Enterprise
- Scottish Futures Trust
- Essential Edinburgh
- Edinburgh Chamber of Commerce
- Federation of Small Businesses
- St James Quarter
- John Lewis
- Ryden (commercial property agent)

Details of the comments are set in the study report, and taken into account in the analysis, summary and conclusions.

Summary of implications for the Proposed Plan

The evidence from the Retail Study shows there is unlikely to be a need for additional convenience or comparison floorspace in Edinburgh over the next ten years, based on projected expenditure and online shopping trends. The Council will take into account this evidence when preparing the Proposed Plan.

Edinburgh's network of centres is unique as it has proved robust in the face of changing retail trends. It has achieved this through adaptation, by diversifying into leisure and other non-retail uses, whilst continuing to support its retail role, achieving a finely balanced mix of uses. The Council will explore the best approach to continue to support its network of centres in the face of retail trends and changes to permitted development rights.

The evidence shows that the network of centres provides good access to fresh healthy food to meet the needs of most residents. However, there may be a need for additional food provision in certain parts of the city, which are identified in the Place Profiles. The Council will explore how to support retail that provides affordable healthy food in these identified parts of the city.

There is some evidence of clustering of non-retail uses with the potential for adverse impacts on health and wellbeing. The Council will explore the best means by which to address existing and future clustering of such uses when preparing the Proposed

Plan. There are also 21 drive through restaurant facilities distributed across Edinburgh. There is unlikely to be locations where further facilities would be supported on the principles of local living and sustainable travel.

Edinburgh's town centres are predominantly high-density residential properties (tenements) and opportunities to support residential development within allocated town centres tends to be limited and takes the form of either a change of use and refurbishment of existing and vacant buildings. The Proposed Plan will consider if there is a requirement to prepare a local approach to protect the character of its town centres and to guide proposals for redevelopment of sites to protect and reinforce commercial uses.

Statements of agreement / dispute

NHS Lothian have confirmed they consider the evidence sufficient. There are no outstanding issues.

20: Tourism, culture and creativity

Topic	**20: Tourism, culture and creativity**
Description of topic	Assessment of the trends, issues and adverse impacts associated with tourism, and an assessment of the principal cultural, social and built heritage characteristics in Edinburgh.
Information required by the Act	**Town and Country Planning (Scotland) Act 1997, as amended:** Section 15(5) – of the 2019 Planning (Scotland) Act requires the Evidence Report to: • set out the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; and • the principal purposes for which the land is used. • The desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular but not limited to live music venues) in the district.
Relevant NPF4 Policies	• Policy 30 Tourism • Policy 31 Culture and creativity
Local Development Plan Guidance	• Tourism (Page 86) sets out: the Evidence Report is expected to reference any relevant national and local sector driven tourism strategies and identify any key spatial issues. The Evidence Report can help to identify issues affecting the resilience of the tourism sector in the area, such as environmental, cultural and community assets, as well as the availability of tourism accommodation and associated infrastructure considerations. • Culture and creativity (page 87) sets out: the Evidence Report can be informed by any relevant Creative Scotland plans and strategies, together with any local plans and strategies that address the area's culture and creativity. This can include consideration of the existing location, range, and health of facilities and venues, as well as aspirations to add to the range of art or cultural venues in a place.
Linked Topic Papers	• Topic 12 Housing Land • Topic 15 Local living and 20 minute neighbourhoods • Place Profiles
List of and links to evidence	• **CD033** City Plan 2030- Written Statement, City of Edinburgh Council, November 2024 • **CD100** National Planning Framework 4 (NPF4), Scottish Government, February 2023

- **CD197** Scotland's National Strategy for Economic Transformation, Scottish Government, March 2022
- **CD647** Scotland Outlook 2030, Scottish Tourism Alliance, 2020
- **CD699** Environmental Sustainability Policy, Visit Scotland, February 2026
- **CD700** International Tourism Update: 2024, Visit Scotland, August 2025
- **CD701** Local Area Factsheet: Edinburgh, Visit Scotland, 2023
- **CD702** Visit Scotland: Destination Net Zero Climate Action Plan, Visit Scotland
- **CD454** Edinburgh's 2030 Tourism Strategy, Edinburgh Tourism Implementation Group
- **CD506** Responsible Tourism Framework, Historic Environment Scotland, March 2023
- **CD038** Edinburgh Economic Needs Study: Economic Overview, Biggar Economics (City of Edinburgh Council), February 2025
- **CD043** Edinburgh Economic Needs Study: Visitor Accommodation, AR Hospitality Consulting, May 2025
- **CD470** Edinburgh Visitor Accommodation Sector Commercial Needs Study, GVA and Ryden, January 2019
- **CD289** Edinburgh by Numbers 2024, City of Edinburgh Council, 2024
- **CD076** City Mobility Plan 2021-2030, City of Edinburgh Council, February 2021
- **CD081** City Mobility Plan – Appendix 4, Updated Implementation Plan, City of Edinburgh Council February 2024
- **CD077** City Mobility Plan. Implementation Plan: (Active Travel), City of Edinburgh Council, February 2024
- **CD282** Designation of Short-Term Let Control Area for Edinburgh Statement of Reasons Background Report, City of Edinburgh Council, February 2022
- **CD430** Scotland's Creative Learning Plan, Creative Scotland, 2013
- **CD431** Creative Scotland and Education Scotland - An Action Plan for 2022-23, Creative Scotland and Education Scotland, December 2022
- **CD114** A Culture Strategy for Scotland, Scottish Government, February 2020
- **CD264** Citywide Culture Strategy 2023-30, City of Edinburgh Council
- **CD108** Edinburgh and South East Scotland Regional Prosperity Framework (2021 – 2041), City Region: Edinburgh & South East Scotland

- **CD082** Edinburgh Economy Strategy, Edinburgh Tourism Action Group, June 2018
- **CD340** Place-Based Property Improvement Programme, City of Edinburgh Council, September 2024
- **CD285** Draft Future Libraries Strategy and Service Change Proposals, City of Edinburgh Council, June 2025
- **CD037** Economic Needs Study: Summary and Land Use Implications, Ryden (city of Edinburgh Council), November 2025
- **CD039** Edinburgh Economic Needs Study: Retail Study, Roderick Maclean Associates and Ryden (City of Edinburgh Council), September 2025
- **CD042** Economic Needs Study: Industrial Report, Ryden (City of Edinburgh Council), September 2025
- **CD041** Economic Needs Study: Office Report, Ryden (City of Edinburgh Council), July 2025
- **CD043** Edinburgh Economic Needs Study: Visitor Accommodation, AR Hospitality Consulting, May 2025
- **CD040** Economic Needs Study: Leisure, Ryden (City of Edinburgh Council), October 2025

List of matters covered

Firstly, this Topic Paper sets out the evidence related to tourism and related matters, including community and visitor needs, accommodation demand and emerging trends, related pressures and challenges. The evidence is presented as follows:

- National Context
- Regional Context
- Local Context
- Key Statistics
- Needs of Communities and Visitors
- Tourism Pressures and Challenges.

Secondly, the Topic Paper sets out the evidence related to culture and creativity matters. It provides a summary of the key data and evidence for culture and creativity in the Edinburgh area and outlines the planning authority's considerations of this evidence, including likely implications for the preparation of the Proposed Plan. The evidence is presented as follows:

- National Context
- Local Context
- Policy Context (NPF4 and Local Development Plan)
- Economic Needs Study; Leisure

- Culture and Creativity Infrastructure
- Council Community Facilities
- Strategies and Future Requirements.

Summary of evidence

Tourism

National Context

The Scottish Government's National Strategy for Economic Transformation sets out the aim to strengthen Scotland's position in new markets and industries, generating new, well-paid jobs from a just transition to net zero, within which eco-tourism, creative industries, major events and tourism, are recognised as key sectors.

Scotland Outlook 2030 – Scotland's National Tourism Strategy was launched on 4 March 2020. It was developed as a partnership involving the Scottish Tourism Alliance, Scottish Government, VisitScotland, Scottish Enterprise, Highlands and Islands Enterprise and Skills Development Scotland. Over 2,500 stakeholders from the tourism industry contributed to its development. Its vision is for Scotland to be the world leader in 21st century tourism. Its mission is to grow the value and positively enhance the benefits of tourism across Scotland by delivering the very best for visitors, businesses, Scotland's people, its communities and the environment. It sets out a number of commitments some of which are directly relevant to the Planning system including making sure that tourism is responsible by making a full contribution to net zero, improves community wellbeing and nurtures thriving places across Scotland which can develop and manage tourism effectively and responsibly.

The Strategy describes how climate change presents the biggest threat to society as it is understood today. It is estimated that globally tourism contributes around 8% of carbon emissions. These come from aviation, transport, accommodation, leisure activities, the growing number of travellers, consumption and waste.

VisitScotland's sustainability policy sets out measures to protect and enhance Scotland's environment, society and culture. The key objectives of the policy are considered to align with the provisions of NPF4 and are outlined as follows:

- minimise resource use and waste production
- reduce the impact of transport
- protect and enhance Scotland's natural and cultural heritage
- enhance quality of life for Scottish communities
- improve the quality of tourism jobs
- make tourism in Scotland inclusive and available for all
- support climate change mitigation and adaptation in the tourism sector.

The purpose of VisitScotland's Destination Net Zero Climate Action Plan is to support and speed up climate action within the Scottish tourism and events sector to ensure that the sector achieves the Scottish Government's 2045 net zero target. The plan identifies the following priority action areas:

- measure, monitor and report on greenhouse gas (GHG) emissions
- energy efficiency and renewables
- resource use and waste reduction (Circularity)
- low carbon consumption
- low carbon transport and active travel
- climate change adaptation and
- protect and restore the natural environment.

Historic Environment Scotland has prepared a Responsible Tourism Framework. This defines HES' understanding of, and the role of, responsible tourism. It outlines the principles guiding the organisation's decision-making and around which HES can build actions going forward. The Framework sets out how tourism in the historic environment can contribute to better quality of life and meaningful experiences for all, now and for future generations.

National Planning Framework 4 requires local development plans (LDPs) to support the recovery, growth and long-term resilience of the tourism sector. The spatial strategy of the plan should identify suitable locations which reflect opportunities for tourism development by talking full account of the needs of communities, visitors, the industry and the environment. Relevant national and local tourism strategies should also be taken into account. The spatial strategy should also identify areas of pressure where existing tourism provision is having adverse impacts on the environment or the quality of life of local communities.

Regional Context

The Regional Prosperity Framework (RPF), published in September 2021, is the next phase of the development of Edinburgh and South East Scotland's regional economy, building upon the City Region Deal. It is designed to be a single document that helps to shape where public and private investment, including Levelling Up monies, could make the best contribution to drive the region forward in a sustainable and inclusive manner. At the heart of the RPF are three key components aimed at delivering a future society that is resilient, flourishing and innovative. It outlines three priorities:

- reduced economic exclusion
- increased regional competitiveness, and
- accelerate the transition to net zero.

The four set priority initiatives are the following:

- infrastructure for recovery and prosperity

- to develop a green regeneration investment prospectus
- to secure a sustainable visitor economy and promote cultural assets, and
- to promote the transition to data driven innovation (DDI).

The aspirations outlined in the RPF point towards a growing importance of the green energy transition. An emphasis is put on tourism where it will be sustainable, and satisfying the needs of the city, promoting the cultural, artistic and historic assets of the city. The promotion of data-driven technologies may also have effects on other industries with the main ones benefiting being companies focused on research and development, technology, software and data science. City Plan 2040 has a role to play in helping to deliver the priorities of the RPF.

Local Context

Edinburgh 2030 Tourism Strategy

The development of the Edinburgh 2030 Tourism Strategy was initiated by the Edinburgh Tourism Strategy Implementation Group (SIG) in 2018, in line with the city's new Economy Strategy which was approved by the Council in June 2018.

The tourism strategy sets out key themes, ambitions and principal recommendations for the decade to 2030. It sets out the context in terms of the shifts and pressures in urban tourism around the world, and the city's expected urban growth. It presents five priority areas for action designed to help the business of tourism meet the city's long-term ambitions in terms of inclusive, sustainable economic growth.

The Strategy notes that long-term projections show tourism demand will increase in Edinburgh. It also states that tourism supply is also growing in terms of new hotels, improved transport connections, that the festivals are increasingly popular and development such as St James Quarter and Edinburgh Waterfront will create new reasons to visit the city. It states that it is time to shift focus from just growth to making growth work better for the city and recognising that some forms of tourism activity pose more challenges to the city than others resulting in difficult decisions to make.

As a result, the Strategy sets out a framework of guiding principles and headline recommendations rather than specific actions. It stresses that the guiding principle should always be to ask: 'how can we improve the quality of life for residents and contribute to the city's broader economic goals?'

It identifies a series of recommendations under the following headings:

- We will nurture and develop our people
- We will nurture and develop our place
- We will nurture and develop our environment
- We will nurture and develop our partnerships
- We will nurture and develop our reputation.

City Plan 2040 can help to deliver the ambitions of the Edinburgh tourism strategy and ongoing long-term goals.

Edinburgh Local Development Plan 2016 and City Plan 2030

The important role of tourism is recognised in City Plan 2030, in particular in relation to its contribution to the Edinburgh economy. There are two policies within the adopted plan that relate specifically to tourism.

Policy Econ 6 Hotel Development in the adopted City Plan 2030 sets out policy to support hotel development within the city centre, the boundaries of the airport, the Royal Highland Centre and West Edinburgh, defined town/local/commercial centres and locations within the urban area with good public transport access to the city centre. This supportive policy is broadly in line with the NPF4 policies on tourism. However, the Proposed Plan will need to consider how the outcomes of NPF4 Policy 30 Tourism can be addressed in the Edinburgh context of growing demand, the need for sustainability and balance with communities.

Policy Hou 6 Inappropriate Uses in Residential Areas in City Plan 2030 sets out policy which does not permit changes of use which would detrimentally affect the living conditions of nearby residents. Although this does not specifically refer to tourism, it is used to determine proposals for short term lets which are primarily used by tourists. Short-term letting, which is covered in more detail below, can be problematic, and can have a detrimental impact on residents.

Demand for tourist bed spaces has resulted in a significant number of new hotels being built in recent years as the evidence from the Economic Needs Study Visitor Accommodation paper set out below demonstrates. This matter is also referred to in the Topic 18 Economy, business and industry in the context of the loss of office floorspace.

Policy Econ 6 has been successful in supporting proposals for new hotels, however, there is evidence that this has partly happened at the expense of the office sector with former offices or their sites being redeveloped as hotels and the resulting loss of office floorspace. In addition, the visitor accommodation sector is becoming more complex, particularly as a result of the introduction of licencing for short term lets. Developers are now also bringing forward proposals for alternative, less conventional types of visitor accommodation, for example apart-hotels. These types of proposals are similar to hotels with staffed reception desk, communal toilets etc, but with kitchen facilities provided within individual rooms. However, some hotel operators have chosen to no longer provide reception facilities or subsequently chosen to remove them, and as a result the Council would generally consider these businesses to be serviced apartments or short term lets and represent a sui generis use.

In the preparation of the Proposed Plan, there will be a need to review the role and the scope of visitor accommodation policy in light of these new trends in order to determine the appropriate response.

Key Statistics

Edinburgh is a strong and resilient city, successful in creating employment and attracting business investment. Tourism is a key sector of the economy and one of the largest sources of employment in Edinburgh providing approximate 42,000 jobs. There has been a 22.3% increase in employment in the tourism sector between 2015 and 2023 as shown in the Economic Overview paper (page 25) of the Economic Needs Study which the Council commissioned. In addition, Edinburgh has a wide range of cultural, art and sports venues which bring economic benefits as well as supporting the wellbeing of residents and visitors. One of the key aims of City Plan 2030 is to deliver Edinburgh's key economic land use needs, including supporting the city centre, Edinburgh Waterfront and West Edinburgh which all have an important role to play in the context of tourism. In particular, the city centre is a major tourist draw and West Edinburgh is the location of Edinburgh Airport which is Scotland's busiest airport and a major international gateway.

Edinburgh is the historic capital of Scotland and is a major draw for tourists both domestically and internationally. Edinburgh has two designated World Heritage Sites: The Old and New Towns of Edinburgh and the Forth Bridge, more listed buildings than any other council area in Scotland and 50 designated conservation areas covering many parts of the city. Protection of the unique historic character of the city, is particularly important in the context of the tourism industry, as its heritage is a major attraction to tourists and this is covered in Topic 10 Historic assets and places.

In 2024, according to VisitScotland's annual performance report, international visitors made 4.4 million trips to Scotland with £3.9 billion spent overall. This spending has risen by 7% compared to the same period in 2023. In 2024, the most recent data for Edinburgh, there were 17.79 million overnight trips by international and domestic visitors generating a total spend of £2,565 million. The time series data shown in Figure 1 below shows there has been a rebound in tourism following the Covid pandemic with the number of international visits rising back up to 4.6 million in 2023 from a low of 0.4 million although it has dropped back in 2024. Nevertheless, this still represents a robust rebound from the pandemic, and it is expected that the growth trend will continue fuelling demand for tourism investment, as mentioned in paragraph 4.1.1. of the Economic Overview paper.

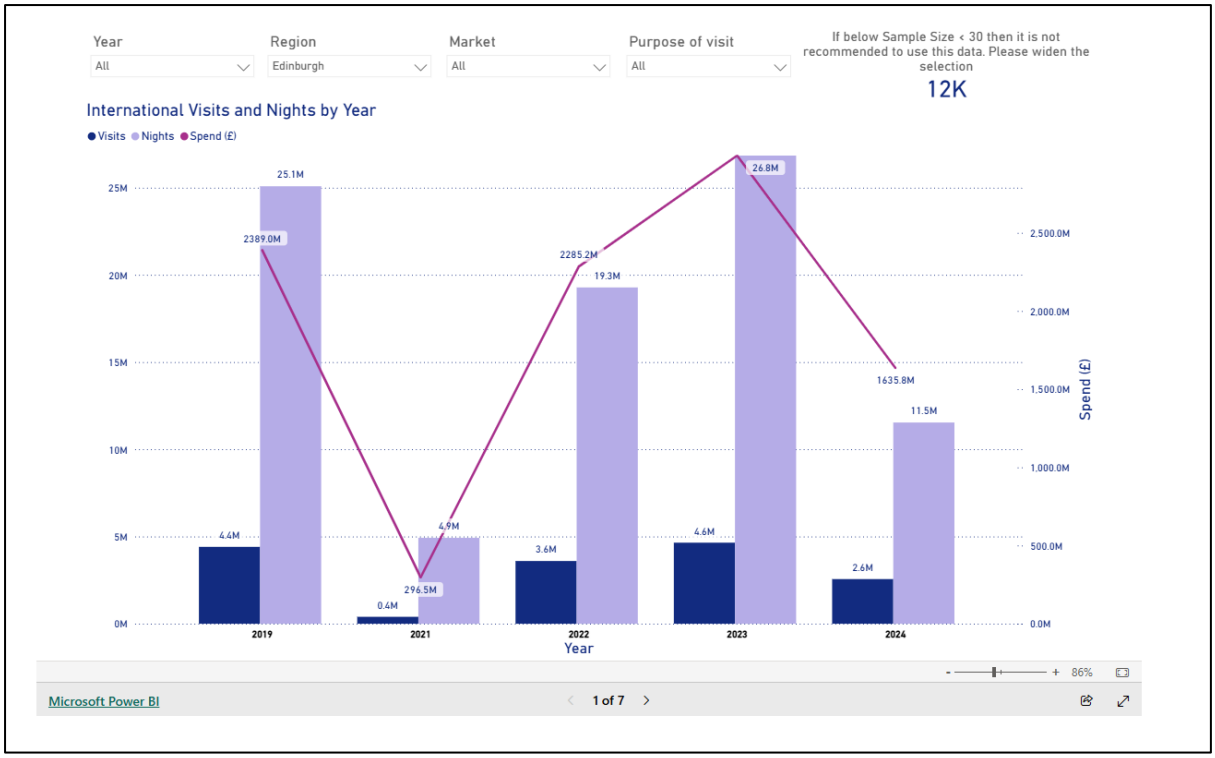


Figure 20.1: Time Series Data for International visits

According to the Visitor Accommodation paper that the Council commissioned as part of the Economic Needs Study, hotel occupancy has recovered as well and in 2024 it reached 81.4%, the highest in the last six years. Most overnight visits to Edinburgh happen during the summer season but in 2023, it was matched by the number of visitors from October to December. The list of countries that produce the largest number of international visitors to Edinburgh, according to Edinburgh by Numbers 2024, is topped by the USA (2.6 million in 2023), which also generates the highest amount of spending (£462.9 million). France is the second largest in terms of visitors (0.9 million) and total spend (£100.3 million). In terms of domestic visitors most are from the east of Scotland (over 20%), however, in terms of spending the highest levels of spending are from visitors from the west of Scotland and London.

In terms of Edinburgh's visitor profile, VisitScotland's Visitor Survey (2023) Local Area Factsheet revealed that 36% were domestic and 64% were international overnight visitors. In particular, the majority of visitors were older independents (47%) followed by retirement age (27%), only 9% were families and "pre-nesters" (aged 16-34 with no children) made up the remaining 17%.

On average, visitors stayed 3.5 nights in Edinburgh compared with 8.7 in Scotland overall. In addition, only 23% stayed exclusively in Edinburgh. Of these visitors, 48% were first time visitors and 52% were repeat visitors. The largest percentage of visitors stayed in hotels (58%) with 34% staying in non-serviced accommodation.

Needs of Communities and Visitors

Attractions

VisitScotland's Visitor Survey 2023 Edinburgh Factsheet found the top three reasons given by visitors to Edinburgh for visiting Scotland were the 'scenery and landscape' (70%), the 'history and culture' (61%) and 'Scotland's people' (27%) which was very similar to the national results. This highlights the importance of Edinburgh's culture and heritage for attracting visitors and supporting the tourist sector. The city's distinctive townscape and surrounding landscape and its associated cultural heritage provide the assets to sustain and expand tourist growth whilst protecting its established attractions such as Edinburgh Castle, the Palace of Holyroodhouse and Arthur's Seat is fundamental to its success.

Edinburgh has a broad range of tourist attractions many of which are related to the city's heritage and historic cityscape. In 2023, the top visitor attractions were as follows (Source: Edinburgh by Numbers 2024):

1. National Museum of Scotland
2. Edinburgh Castle
3. National Galleries Scotland
4. St Giles Cathedral
5. Royal Botanic Garden
6. National War Museum
7. Edinburgh Zoo
8. Edinburgh Bus Tours
9. Scotch Whisky Experience
10. Camera Obscura & World of Illusions

A more comprehensive list of visitor attractions can be found in the core documents as an appendix**.** Edinburgh is also a cultural destination for tourists; this is explored in further detail below under Culture and Creativity. These attractions draw in large amounts of visitor spending. According to Edinburgh by Numbers, the international visitors from the top five countries in 2023 generated £807 million and domestic visitors generated £87.7 million. This income helps sustain, not just the tourism industry, but retailers, restaurants/cafés and a wide range of related supporting businesses to the benefit of the city, its employees and its residents. Edinburgh's key tourist attractions will be taken into account in the development of the spatial strategy in considering opportunities for supporting tourism development across the city.

Not all of the tourism industry is located within the city centre area. There are also outdoor related leisure activities, which take advantage of the area's natural environment. To the south of Edinburgh are the Pentland Hills which provide opportunities for walking, mountain biking, fishing and even all year-round skiing at the Midlothian Snowsports centre. To the west of Edinburgh is Jupiter Artland, the Edinburgh International Climbing Arena and Lost Shore Surf Resort at Ratho and the Forth Bridge which is designated a UNESCO World Heritage Site.

In preparing the Proposed Plan, the Council will have to consider how its spatial strategy, land allocations, policies and any associated guidance can support the sustainable growth and long-term resilience of the tourism sector. However, a balance will have to be struck between supporting the tourism sector and the benefits it brings without compromising the well-being of Edinburgh's residents and the city's attributes.

Economic Needs Study

The Council's Economic Needs Study comprehensively examines the Edinburgh economy, including an assessment of the supply and demand for various types of commercial uses, and identifies key issues to inform the Evidence Report. The Study comprises of papers on the following matters:

- Edinburgh Economic Overview
- Industrial
- Offices
- Retail
- Leisure
- Visitor Accommodation
- Summary and Land Use Implications

This topic paper is primarily focused on the findings of the visitor accommodation paper and other aspects of the Economic Needs Study are covered in different topic papers: Topic 18 Economy, business and industry and Topic 19 City, town, local and commercial centres.

Visitor Accommodation Study

Tourism is a key sector and economic driver for the city, which has a comprehensive supply of visitor accommodation across various sub-sectors. The Visitor Accommodation study () examined the following:

- The current supply across all sub-sectors, by type and geography
- The current and historic demand for visitor accommodation in the city, by type
- The likely future growth of visitor accommodation demand by type and geography
- The requirements and priorities for future land allocation for visitor accommodation by type and geography, and potential conflicts with other land uses such as offices and retail.

Full details are set out in the visitor accommodation study but a summary of its findings are as follows:

- Demand for visitor accommodation in Edinburgh has increased significantly in recent years particularly amongst affluent international tourists and is likely to remain so. This is a Scotland-wide trend, although most visitors include an Edinburgh stay as part of their visit.

- Current accommodation supply does not meet the needs of all visitors with many being priced out or there not being enough bed spaces to meet demand. As a result, other destinations such as neighbouring local authorities and Glasgow benefit from a spill over in demand at peak periods. This situation is exacerbated by growth in high spending visitors, a slowing pipeline of midmarket hotels and a decrease in short term let supply. The decline in short term lets is likely to be contributing to the very high demand and pricing in serviced accommodation.
- Supply of accommodation to a large extent is concentrated in the city centre leading to overcrowding at peak times.
- Edinburgh remains a key market for hotel operators and investors. Despite hotels, apart hotels and serviced departments performing close to peak capacity for much of the year, demand for other types of accommodation is more seasonal and estimated to be around only 58% across the year. This suggests that hotels, apart-hotels and serviced apartments are the preferred accommodation choice for the majority of visitors.
- Under a core demand growth scenario of 3% per annum, it is estimated that an additional 700 rooms on average per year will be required over the lifetime of the plan.
- This is well above the 394 rooms per year over that last 10 years, which was impacted by the significant slowdown of the pipeline during and since the COVID-19 pandemic. The Visitor Accommodation Study 2019 identified capacity for 717 new rooms to 2030, but from 2019 to 2024 only 369 on average have been delivered.
- It is possible that demand growth could exceed 3% as it has done in the past and that other types of visitor accommodation fail to keep pace. In this case, the demand for new hotel and serviced apartment supply will be even greater. If supply increases do not keep pace with demand growth the issues of very high pricing and associated impacts will remain.
- The increase in hotel, apart-hotel and serviced apartment supply needs to be accompanied by increases in the supply of non-serviced apartments, hostels and other accommodation, some of which may be provided only on a peak season basis.
- Hotel, apart-hotel and serviced apartment operator interest is likely to remain very strong and the central location preference of high-end and luxury hotel operators will remain a key requirement. However, as Topic 18 Economy, business and industry outlines, there is a competition for land with offices for sites in the city centre. Any new supply of economy and mid-market hotels could potentially be directed to other areas of the city and other emerging demand drivers subject to other requirements such as good public transport access and this should be explored as part of the Proposed Plan.
- Other accommodation supply might also be directed towards city neighbourhoods as key tourism targets which has the potential to support

local businesses and spread tourism spend but this should comprise use of disused commercial premises and brownfield sites, where compatible with the location, rather than impacting on residential stock.

Edinburgh Visitor Levy

The Council on 24 January 2025 agreed to implement a visitor levy. From 24 July 2026, a five percent fee will be applied to the cost of overnight accommodation in Edinburgh capped at five nights in a row. The levy is expected to raise up to £50 million a year once established for investment in protecting, supporting and enhancing Edinburgh's worldwide appeal as a place to live and visit.

The aim of the visitor levy is to sustain Edinburgh's status as one of the world's greatest cultural and heritage cities, and to ensure that the impacts of a successful visitor economy are managed effectively and in support of the priorities as set out in the business plan. The objectives of the scheme are to sustain, support and develop:

- Public services, programmes and infrastructure that provide an enjoyable and safe visitor and resident experience
- Edinburgh's culture, heritage and events provision to ensure it remains world-leading and competitively attractive to visitors as well as residents
- The city's visitor economy, by fostering innovation in response to environmental and societal challenges, enhancing Edinburgh's global reputation while promoting responsible and sustainable tourism.

The net proceeds from the levy must be spent on facilitating the achievements of the scheme's objectives and developing, supporting and sustaining facilities and services which are substantially for or used by persons visiting overnight for leisure or business purposes.

After administrative costs a fixed amount will be assigned to:

- Housing and tourism (£5 million per year)
- Participatory budgeting (£2 million over three years)
- Reimbursement of two percent of remitted funds to accommodation providers.

The remaining funds will then be split into the following investment streams:

- City Operations and Infrastructure (55%)
- Culture, Heritage and Events (35%), and
- Destination and visitor management (10%).

The Council will make decisions on the use of funds after consultation with the Visitor Levy Forum, with these decisions delegated to the relevant executive committee. The Council intends to review the scheme every three years to assess if it is meeting its objectives and to measure the impact on businesses, visitors and communities.

Tourism: Pressures and Challenges

Two of the most popular festivals held in Edinburgh are the Edinburgh Fringe which attracted 2.45 million visitors in 2023 (Edinburgh By Numbers 2024) and the Edinburgh International Festival**.** These events, alongside the associated Royal Edinburgh Military Tattoo, attract high numbers of visitors from abroad to the significant benefit of the Edinburgh economy in terms of revenue and jobs generated.

These events, whilst being very popular and generating significant amounts of revenue for businesses, create pressure on the existing visitor accommodation supply at certain times of the year and result in the cost of accommodation being very expensive, particularly at those times. The consequence of this is that the visitor accommodation can become unaffordable for performers taking part in the events, either putting them off from taking part or having to find alternative accommodation, potentially more distant to the city. This is counterproductive to delivering these successful events and a significant pressure. The price of visitor accommodation is considered in further detail above in the context of the Commercial Needs Study.

Edinburgh's historic environment and green landscape are key draws for tourists coming to Edinburgh, however, their quality and maintenance are fundamental to protect its role. Tourism has the potential to negatively impact on the very assets and places that attract visitors. 'Over-tourism' can lead to overcrowding, noise, littering and related wear and tear, reducing the quality of the visitor experience and adversely affect the amenity of local residents. City Plan 2030 contains policies to protect the city's historic environment which are outlined in Topic 10 Historic assets and places but these does not prevent wear caused by tourism.

Edinburgh's complex network of streets and roads, particularly in the city centre, can become very congested during the summer when tourism is at its peak. The Council's City Mobility Plan and the associated Implementation Plan help to address some of the impacts of tourism through various policies and projects helping to reduce private vehicle trips and increase active travel and public transport mode share. For example, the Edinburgh tram which was introduced in 2014 between Edinburgh Airport and the city centre helps to transport visitors from the airport, complementing the airport express bus service. There are also five park and ride sites on the edge of the city, a low emissions zone improving air quality in the city centre, proposals to expand capacity on the bus and tram network, and rail network improvements through the Waverley masterplan. The Mobility Plan also seeks to support improvements to active travel, for example through a bike share scheme, improved interchanges, and a package of active travel measures as set out in the Council's Delivering Actions for Active Travel.

Edinburgh has experienced a steep rise in the number of residential properties being used for short-term lets (STL) associated with the tourism industry for many years, reducing the availability of homes to meet traditional housing need. STLs are where

property owners let out existing residential properties to visitors. There are a number of ways a property can be let, for example as secondary letting, where the property owner does not live in the property; as home letting, where the owner lets out a property on a short-term basis, for example when on holiday; or through home sharing, where the property owner lets the property whilst living there.

As set out in a report to the Planning Committee on 23 February 2022, Edinburgh's high number of STLs raised significant concerns and gave justification for action to mitigate the impacts. Prior to 2019, there was a steady increase each year in the number of STLs listed on Airbnb and in March 2019, there were 8,739 entire property listings. The Covid 19 pandemic did have an impact on the number of STLs, however, the number remained high and in October 2021, there were 4,077 entire property listings on Airbnb.

This trend also has significant consequences for the quality of life and health of residents. In particular, the frequent movements of tourists on shared stairwells of tenement/flatted properties creates noise and disturbance for residents to the detriment of their wellbeing. As a result of these impacts, the Council introduced a short-term let control area in September 2022 covering the whole of the Council area. This change means that a change of use of a dwellinghouse to a short-term let on or after that date is now deemed a material change of use and requires planning permission. In addition, in October 2022 a new licensing scheme was introduced requiring owners of STL properties to apply for licenses. The requirement for the licence is separate from any need to have planning permission.

In practical terms, these changes have resulted in a significant reduction in the number of properties being used as STLs. For example, the number of Airbnb listings for entire properties has almost halved between 2020 to 2024, from 7,895 to 3,694 (see Table 20.2). Airbnb is just one of the booking platforms so the total number of dwellings in use as STLs will likely be higher but it still is a significant drop. The reduction in short term lets has been recognised in the Visitor Accommodation study above as contributing to demand/pricing issues. However, the Council considers it is taking a balanced approach seeking to manage the pressures of tourism for the wider benefits of the city without compromising the wellbeing of its residents.

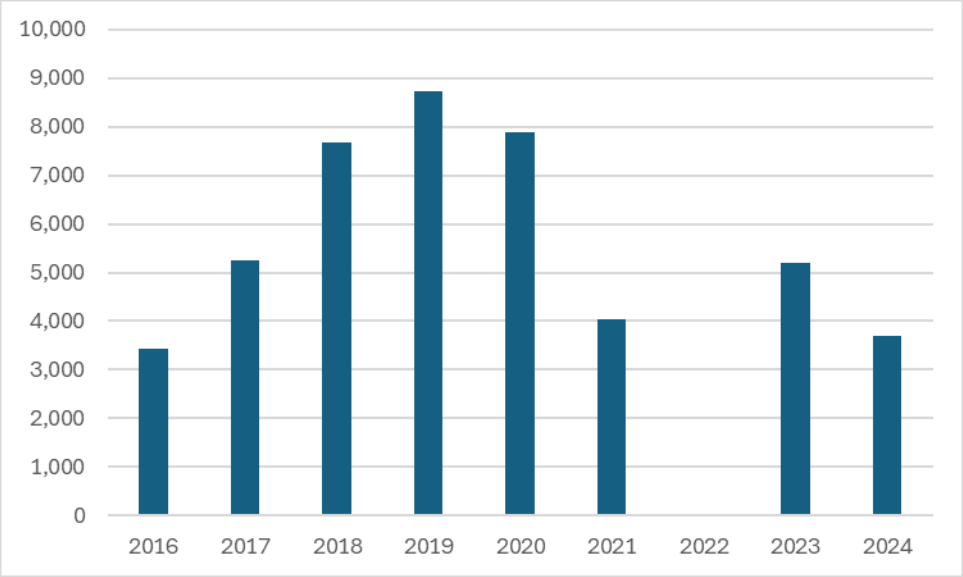


Figure 20.2: Airbnb Entire Property Listings 2016-2024 (source: Airbnb; note: no data is available for 2022)

In preparing the Proposed Plan, these potential impacts from tourism will have to be carefully considered, informed by the relevant evidence presented in the Evidence Report under this and other relevant related topic papers.

Culture and Creativity

National Context

Creative Scotland plans and strategies

Scotland's Creative Learning Plan**,** which was first published in 2013, sets out the importance of creativity in Scottish education. The vision of this plan is for a more creative Scotland and for its people to be proud of who they are and where they live. To achieve that, the Plan identifies a need to be creative, to generate ideas, to invent, write and express identity through the dramatic arts and film. The Plan sets out the detail of how this will increase Scotland's resilience to change and realise the potential of its people. Following the impact of COVID-19, the vision has been refreshed to ensure the Scottish education system enables everyone to recognise, develop and apply their creativity to ensure they thrive in an increasingly complex and fast changing world.

Creative Scotland and Education Scotland Creative Action Plan 2022-23 commits both organisations to continued collaboration on initiatives, projects and actions within the education and arts landscape. It sets out a three-year agreement to:

- Ensure creativity is embedded in education, and that it is recognised, articulated and valued in the national conversation and education reform
- Create a secure framework with longer term planning horizons that accounts for change across the education and wider landscapes

- Enable strategic, effective and efficient working across both organisations.

It sets out a number of aligned outcomes, the most relevant to the planning system being to ensure ‘high quality cultural and expressive arts experiences are more widely accessible to all learners.’

A Cultural Strategy for Scotland, prepared by the Scottish Government, aims to place culture as a central consideration across all policy areas including education and open the potential of culture as a transformative opportunity across society. To support this, the strategy entrusts Education Scotland and Creative Scotland with helping to improve cultural experiences for learners of all ages.

The Strategy sets out a number of aims including recognising each community’s own local culture in generating a distinct sense of place, identity and confidence. It also sets out a number of guiding principles, the most relevant to planning being that ‘place, community, landscape and geography is important and reflects the creativity of the past and provides inspiration for cultural expression today.’

The Strategy states that culture lies at the heart of successful place-making, drawing on our natural and cultural heritage, to create shared visions for the future. It emphasises that cultural activities are an important economic driver in their own right as well as increasing the interest and appeal of our built environment. By taking cultural impacts into account at an early stage, it states that the planning system can sustain and enhance the cultural offering.

Local Context

Edinburgh’s Citywide Culture Strategy 2023-30

Edinburgh has a long history as a centre of creative thought and practices. The health and vibrancy of the culture and creative sectors in the city are fundamental to its success including employment, tourism, supporting learning, its international reputation and monetary income. The Culture Strategy outlines the priorities and aims, and details the principles that will guide the Council’s support for culture in Edinburgh over an eight-year period. It sets out three high level aims:

- Aim 1: All residents can easily access cultural experiences that they find meaningful in their local area, and everyone has the opportunity to contribute to shaping cultural provision
- Aim 2: Edinburgh is a welcoming and supportive city in which a broad spectrum of creative and cultural practitioners choose to develop their careers
- Aim 3: Edinburgh is a world leading cultural capital, an environmentally responsible host city where ideas are exchanged freely, and the diversity of its residents is celebrated.

The planning system is identified as having a key role in supporting the delivery of the strategy’s aims, in particular by ensuring that cultural provision is embedded

within local living and by working collaboratively with other Council services and stakeholders.

Edinburgh Local Development Plan 2016 and City Plan 2030

City Plan 2030 was adopted in November 2024. There are a number of policies within the adopted local development plan that relate to culture and creativity.

Policy Econ 1 Supporting Inclusive Growth, Innovation and Culture supports development proposals associated with social enterprises, business start-ups, university linked education, research and innovation and culture. City Plan 2030 in the context of delivering ‘a city where everyone shares in its economic success’, seeks to deliver key land use needs, in particular supporting development where there is a contribution to good growth including community and social enterprises, start-ups, culture, innovation and learning.

Policy Econ 1 was introduced by City Plan 2030 to support the Council’s Economic Strategy at the time which set out steps and actions to enable good growth for Edinburgh’s economy. The strategy was built around two priorities of inclusion and innovation. It set out various steps to achieve this, but in particular to build on the success of the city’s world leading culture and tourism sectors. The LDP policy seeks to support proposals that help address the need for inclusive growth, innovation and culture. Proposals relating to culture are expected to be associated with relevant matters such as the Scottish Arts, history, music etc.

A new Economic Strategy has been produced and in preparing the Proposed Plan, consideration will be given to how these aims can be supported and this may be more thematic and strategy based than policy based.

Policy Inf 1 Access to Community Facilities seeks to ensure that new housing development is directed to where residents can access a range of key services within a reasonable distance, in the context of local living and the 20 minute neighbourhood. It supports where possible the delivery of new community facilities as part of multi-service hubs that brings community services together, increasing opportunities for linked trips where the long-term sustainability of the facilities is prioritised. This is a new policy brought forward by the City Plan 2030 to implement the requirements of NPF4 in the context of local living. The 2016 LDP in Policy Hou 10 Community Facilities set out similar requirements.

Policy Inf 2 Loss of Community Facilities does not permit the loss of a valued community facility unless appropriate alternative provision already exists, the service can be provided within another existing facility or where the service can be provided in a different way, for example, as part of the Council’s strategic approach to service delivery. This was a new policy brought forward by City Plan 2030 and implements the requirements of NPF4 in the context of local living. The 2016 LDP in Policy Hou 10 Community Facilities set out similar requirements.

City Plan 2040 should consider the ways in which it can strengthen support for culture and creativity, looking at opportunities through place based policy and/or strategy to embed culture and creativity within development, and to protect existing assets that support its delivery, for the benefit of the Edinburgh's residents.

Community facilities can support a range of activities and services including culture based. The Place Profiles assesses the availability of community space within a local area and identifies where there may be gaps in provision. Recognising the importance of community spaces to support culture, health and wellbeing and local living, Proposed Plan will look to explore how to continue to protect and promote community facilities.

The historic environment plays a large part in the cultural offering in Edinburgh and is protected through various statutory designations, policy and guidance. The economic and cultural benefits of these heritage assets in making Edinburgh an attractive and interesting place to live and visit is important and significant. The Proposed Plan will need to continue to seek to protect the historic environment through its strategy.

Economic Needs Study

Leisure

The Leisure Study which was commissioned as part of the Economic Needs Study provides a detailed assessment of Edinburgh's leisure sector, including the culture sector. It assesses planning policy, market trends, and provides analysis of leisure facilities available to meet market needs. The paper's conclusions can be summarised as follows:

- The leisure sector is navigating a period of economic recovery and shifting consumer behaviour where experiences are being prioritised over other discretionary spending. Growth areas are health and fitness and 'competitive socialising' while sectors such as nightclubs are in decline. Recovery is tempered by rising operating costs and operators are responding by focusing on innovation, technology and experiential venues which are using available retail space and adapting existing buildings.
- Edinburgh is a major regional and visitor destination serving local and national/international visitors. Stock analysis identified 347 leisure properties across the city, including 29 Edinburgh Leisure properties, 10 cinemas, one concert hall, 12 theatres, three casinos, three bingo halls and 18 nightclubs.
- Consultations indicate the sector is highly dynamic, driven by strong consumer demand for integrated experiences that combine food, beverage, and retail elements with a younger demographic's focus on health, wellbeing and fitness. The city continues to attract new formats like competitive socialising with investment concentrated in the city centre, commercial leisure centres and Leith. Despite this, the sector faces significant constraints: public facilities are part of an aging estate with restricted funding, the viability of the sector is challenged by high accommodation and energy costs and

competition for skilled staff. However, there is significant anticipation over major new venues like the planned new arena at Edinburgh Park.

- In terms of future needs, high development costs and a ready supply of vacant properties means that adaptive re-use of existing buildings is now more common. Whilst Edinburgh's regional and visitor market role means new development may happen, it is likely to be in the form of one-off projects rather than waves of commercial development which were seen in the 1990s/2000s. Adaptive reuse and expanding format is likely to be the mainstay of the market alongside the refreshing of existing venues.

Cultural and Creative Infrastructure

The Scottish Household Survey is an annual survey of over 10,000 households carried out by the Scottish Government. The results for 2023 for Scotland showed that 88% of respondents had attended at least one cultural activity or venue in the last twelve months. The survey showed that the rates of participation were highest from those in areas of least deprivation and lowest in the areas of most deprivation. The survey also showed that those in higher income brackets (over £30,000) were more likely to attend cultural activities, in particular the theatre, dance events and the cinema.

There is a wide range of art, heritage and cultural activity in Edinburgh and it has an important role to play in supporting economic and social wellbeing. It is important to understand where and how it is happening and the benefits it brings.

In Edinburgh, the creative sector, culture, heritage and the arts all support a significant level of employment. According to the Council's Economic Overview Study approximately 20,000 jobs (5.4%) are supported by the arts, entertainment and recreation services in Edinburgh, whereas in Scotland they represent only 4.4% of total jobs. As a result, this sector makes an important contribution to the health of the city's economy. Edinburgh hosts 12 festivals every year which were estimated to have generated £407 million in 2022 compared to £280 million in 2015 according to the Economic Overview. This programme of arts and cultural festivals has helped to establish Edinburgh as a centre for creative industries internationally with several organisations working to develop the sector in the context of other major growth sectors in the region. A report on the economic impact of Creative Informatics, an organisation working to increase collaboration between Edinburgh's creative industries and the tech sector, found that it generated £33.1 million of GVA in Scotland between 2019 and 2023. Investment in the sector demonstrates major potential for growth in Edinburgh's creative industries.

NPF4 Policy 18 requires an infrastructure first approach. It states that LDPs should be informed by evidence of infrastructure capacity, condition and needs, and that policy should sustain and meet the requirements of communities. Culture and creative activities require buildings and places for people and communities to come together to learn, enjoy and explore their cultural heritage and diversity. Physical

assets across Edinburgh provide a wide range of activities that support culture, heritage and creativity, providing benefits to local communities and visitors.

The Leisure Study helps to give a picture of the culture and leisure sector. The leisure sector is currently navigating a period of economic recovery and shifting consumer behaviour. Despite a drop in living standards, a medium-term outlook suggests a positive signal for consumer expenditure. Consumers are increasingly prioritising experiences over other discretionary purchases, with notable growth areas being health and fitness and competitive socialising, such as indoor golf, darts and bowling.

Operators are responding by prioritising value, engagement and loyalty, using technology to personalise experiences. This investment is a necessity in the face of increasing costs. Edinburgh has one of the highest percentages of adults attending cultural events in Scotland with cinemas, live music performance and historic places being the most popular forms of attendance. Although some sectors are facing headwinds, in particular the significant decline in nightclubs, others such as cinema are recovering from the COVID-19 pandemic lows although future growth may be limited by the shift to streaming services.

Edinburgh is the regional leisure destination for the residential population and also attracts high volumes of leisure visitors, particularly to annual festivals and major live events such as concerts and sports games. Community sports and recreational facilities are provided throughout the city in 29 facilities operated by Edinburgh Leisure. In the commercial sector, Edinburgh has a very strong position across a number of commercial leisure venues (Fountain Park, St James Quarter, Omni Centre, and Ocean Terminal) which face limited regional competition. Other commercial centres in Edinburgh with leisure uses include Fort Kinnaird and Westside Plaza. There is also a gym at Cameron Toll and one at Craigleith commercial centre. The city attracts new leisure formats and St James Quarter has been a major addition to this. The relevant economic sectors have grown over the last 10 years including notable numbers of smaller businesses.

There are 336 leisure properties in Edinburgh as identified in the Leisure Study. These range from small studios up to major sports and cultural venues, including:

- 10 cinemas of which three are independent
- One concert hall (the Usher Hall) with one more under construction (the Dunard Centre) as well as 12 theatres and multiple temporary venues used during the festivals
- Three bingo halls and three casinos
- 18 nightclubs
- 161 swimming pools, skating rinks, gymnasiums or areas for other indoor/outdoor sports, and 38 sport/fitness studios

- 38 leisure venues including amusements, soft play, bowling alleys, pool/snooker and break out/escape rooms
- 52 other leisure venues including cultural venues in particular 27 museums/galleries/visitor attractions, and karaoke rooms, indoor karting, clubs and marinas.

As a result, the leisure and cultural offering in the city is extensive and provide entertainment for visitors and residents with a broad range of choice and capacity. The main leisure and cultural venues are shown in Figures 3 and 4 showing the distribution across the city. These range from numerous small venues accommodating circa 100 people to the Edinburgh Playhouse which has a capacity of circa 3,000. The consented arena at Edinburgh Park (24/00820/FUL) will have a capacity of circa 8,500. The city's largest venue, Murrayfield Stadium, has a capacity of circa 67,000, which is increasingly used for major concerts in the summer period. A detailed list has been provided as a core document.

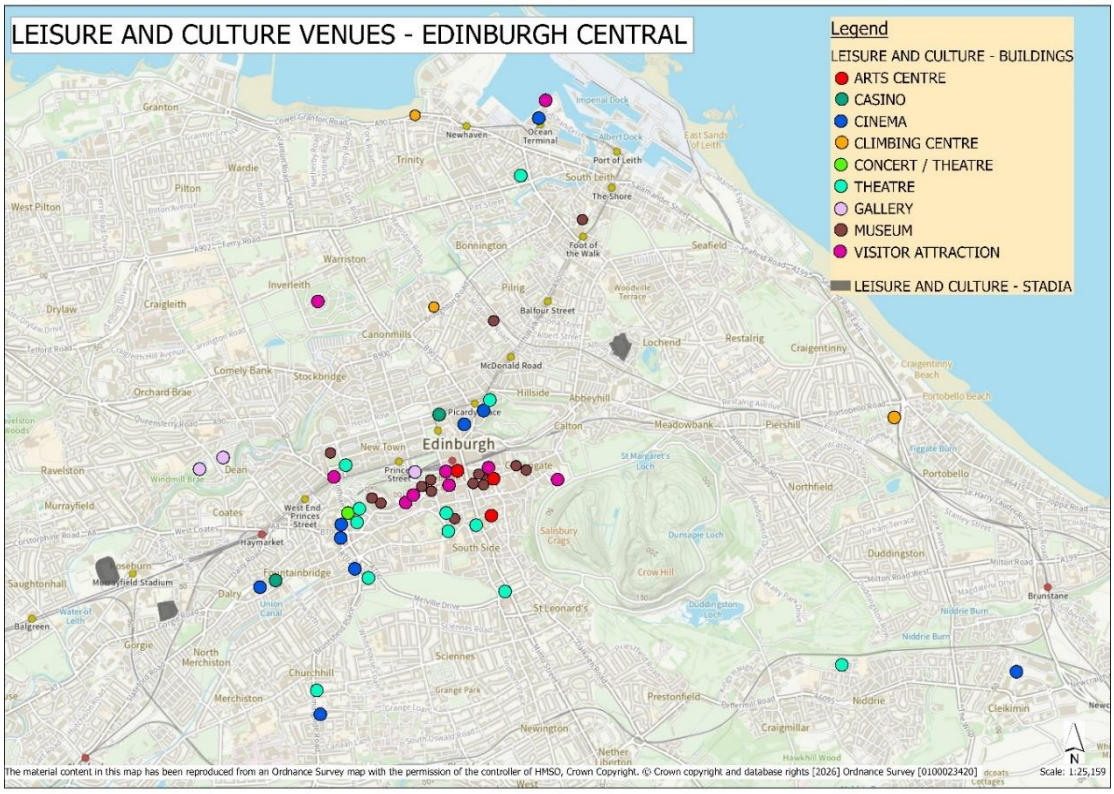


Figure 20.3: Leisure and Cultural Venues

Figure 20.4: Leisure and Cultural Venues (west)

In addition to the main culture or leisure venues, there are also studios, workspaces and multi-art hubs distributed across Edinburgh for use and hire. These facilities together provide a diversity of cultural venues, facilities and activities of various sizes. Core document CD009 provides a list of Edinburgh's main facilities under various leisure categories and whilst up-to-date at present is likely to change over time. In addition, it is important to recognise that culture, leisure and creativity mean different things to different people.

Museums represent important cultural assets for the city in terms of their contribution to culture and creativity as well. There are a number of important museums in the area including the National Museum of Scotland, the Surgeon's Hall Museum, the Museum of Edinburgh and the National War Museum. Art galleries are also important cultural assets, key ones include the National Portrait Gallery, the National Gallery on the Mound, the National Modern Galley on Belford Road and Jupiter Artland.

Venues such as the Playhouse, the Festival Theatre, the Lyceum and the King's Theatre are nationally recognised for the role in promoting the performing arts and attract visitors far and wide, and not just from Edinburgh. Therefore, it is important to recognise that the cultural facilities in Edinburgh are not just a resource for the city's residents but also for Scotland as a whole.

Community Based Facilities

Local community facilities are important which can host cultural activities and events for people within the local area and also reflect the sense of community and history of that place.

In terms of local facilities provided by the Council, there are 28 public libraries distributed across the city and 33 community centres and these are listed in the background paper to this topic. They provide a variety of services for the benefit of communities by hosting events for all ages and providing citizens with advice and access to IT. Most of the libraries are in good or satisfactory condition, although one is currently closed (Blackhall Library) due to discovery of reinforced autoclaved aerated concrete, and two are in poor condition in need of improvement.

The majority of community centres are in good or satisfactory condition with seven in poor condition. There is currently no national planning guidance to inform the calculation of the capacity of community centres and libraries. To assess sufficiency, the Council has considered the availability of community facilities in the Place Profiles. The Place Profiles show that there is good access to libraries and community centres with all wards containing at least one of these facilities.

As well as libraries and community centres, the Council owns/ manages a number of museums, galleries and theatres within the city and provide extensive coverage of the city's art, history and cultural heritage. Many of these are based within local communities and are used by local groups or tell the story of that place; for example Queensferry Museum, Gilmerton Cove or the Churchill Theatre.

As well as Council facilities, it is also important to recognise the role of local places of worship, as these also can provide community spaces for hire for community groups and third sector organisations as well providing their own community-based cultural activities.

There are also many charities and third sector organisations covering the arts, theatre and music sectors which have a key role to play in the economy and support access to culture and creativity within the community. The existence of community-based space allows activities, classes and performances to happen and for people to come together. The existence and use of community space is an important part of effective placemaking and creating a sense of belonging.

The Place Profiles have mapped community space on a ward basis and provides a more in-depth understanding of provision within an area and where there are gaps. Place-based engagement has highlighted how much people value local community space. The Council in preparing the Proposed Plan will consider the role of the existing community facilities, the need to protect these, and to support further provision where required in the context of local living.

Whilst Edinburgh is well catered for in terms of the number and range of cultural and leisure venues/facilities and organisations covering the creative sector, it is clear that there is not an even distribution across the city.

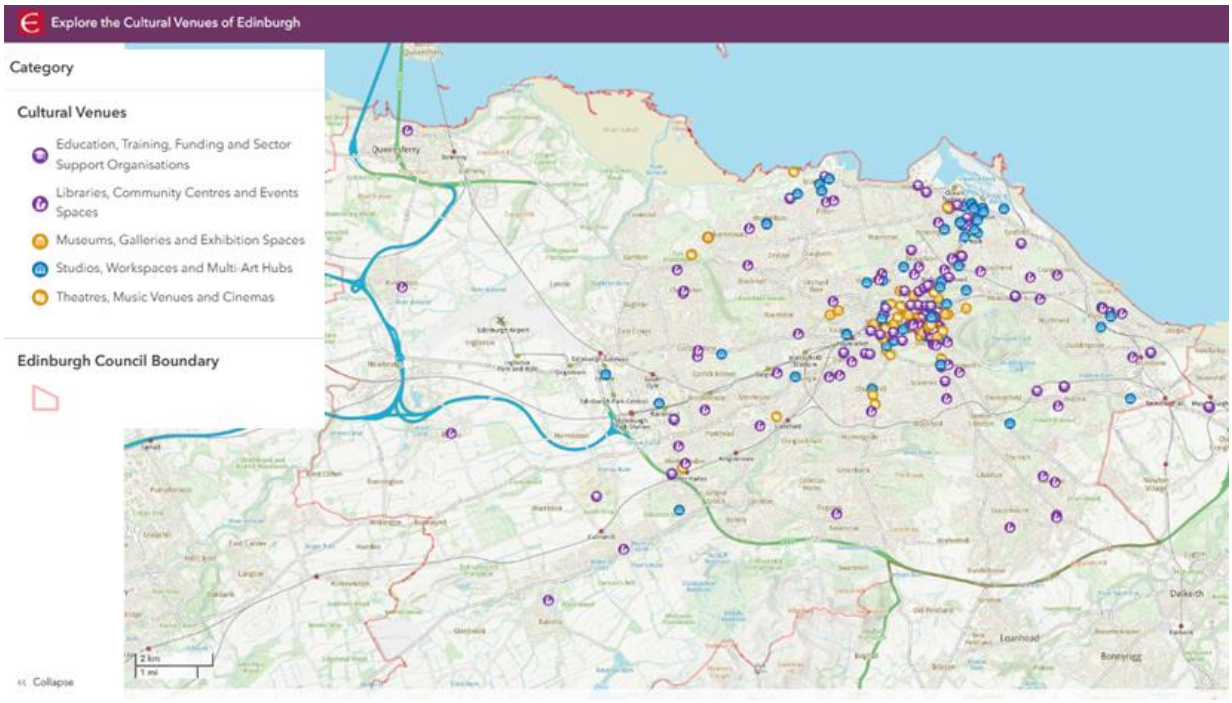


Figure 20.5: Cultural Venues of Edinburgh web page (May 2026)

The data shows that there are clusters of facilities in certain city wards, particularly the wards within and around the city centre which is not surprising, but elsewhere there are some areas of the city where Council wards have no major cultural venues. However, the city centre is very accessible via public transport from almost all parts of the city which partially helps to mitigate the negative effects of such a concentration, but it is important to deliver local living objectives. Therefore, there is a need to ensure the adequate provision of flexible community space to meet local needs and there is an opportunity to address this with the Council taking a lead through the delivery of its culture strategy and in the context of the planning system through the Proposed Plan's strategy.

Leisure: Strategies and Future Requirements

In terms of leisure, Edinburgh is attracting the leading edge of new pursuits such as 'competitive socialising' for example darts, bowling and indoor golf combined with food and drinks. New investment is particularly focused on the city centre, existing commercial leisure centres and Leith. The city has attracted many notable new projects across sports, commercial and cultural leisure activities. Further market requirements for leisure uses are mainly for health and fitness or competitive socialising, typically seeking prominent commercial locations. Lost leisure uses have arisen through market change, the redevelopment of Ocean Terminal and the loss of former nightclubs.

Looking to future leisure market requirements and land use in Edinburgh, the Leisure Study concludes that high development costs and a ready supply of vacant, usually retail, premises means that adaptive reuse of existing buildings is now more common than new construction. While Edinburgh's regional and visitor market roles mean that new development may happen, it is more likely to be one-off projects such as the Edinburgh Park Arena or Dunard Centre, rather than the waves of commercial leisure developments such as the multiplex cinemas of the 1990s.

There may be both commercial and community demand for new leisure uses in the city's expansion and regeneration areas but even in those areas, the requirement may be for upgrade and expansion of nearest existing facilities, public access to high school facilities and/or leisure units within mixed-use commercial buildings rather than major new leisure development.

Community Facilities: Strategies and Future requirements

The Council has adopted a place-based approach to a property improvement programme which was approved by the Council on 19 September 2024. The aim of the programme is to improve access to services for residents whilst rationalising the number of properties from which services will be delivered. The approach is designed to enhance the overall facilities and services within local communities. Despite the challenges, opportunities exist to improve and integrate the delivery of local services in some communities from fewer buildings. As noted above, some community facilities are in poor condition and will benefit from this programme. Properties will only be declared surplus to requirements when agreement on the alternative service delivery option is reached through detailed engagement within the local area. Progressing these opportunities is in accordance with the aspiration of the Council business plan to create community service hubs. Wherever possible, the intention is to integrate the learning estate, libraries, sports, health, care and community centre infrastructure within local neighbourhood campuses utilising, improving and replacing buildings where necessary so that services are delivered from fit for purpose facilities.

The Council will examine the opportunities for the Proposed Plan to support the delivery of the property improvement programme. Consideration of future community need will be required particularly with areas of new housing development associated with the Proposed Plan. However additional funding will be essential to ensure the successful delivery of new facilities.

The Council has adopted a Future Libraries Strategy for Edinburgh. The purpose of the strategy is to provide a framework for service delivery and development over a five year period (2025-30), to support the service to become more sustainable, and to ensure that individuals and communities are provided with the resources and opportunities that they need to learn and thrive.

The key drivers for change include the need for the library service to align better with the Council's business plan priorities and with relevant Council, city and national strategies. There is also a need to identify potential deficiencies to make the service financially sustainable, as the service is currently under financial pressures. There are 28 libraries in Edinburgh as identified in the Place Profiles, and in the context of local living/20 minutes neighbourhoods they provide a range of local facilities for residents including book lending, audio books, photocopying, computer printing, free access to the internet and Wi-Fi, and, in some libraries, musical instrument borrowing. They also host activities and groups such as Bookbugs, knit and natters and Chatterbooks as well as providing community meeting space.

Some of the libraries have a lack of facilities and therefore represent opportunities for improvement through the rationalisation process including potentially co-location to achieve synergies and economies of scale. The Council will examine the opportunities for the Proposed Plan to support the delivery of the Future Libraries Strategy. Consideration of future community need will be required particularly with areas of new housing development associated with the Proposed Plan. However, additional funding will be essential to ensure the successful delivery of new facilities.

Summary of stakeholder engagement

Key Agency	**NatureScot**
Main views raised	**Scoping (May 2025):** Suggested that the impacts of tourism on tourism, culture and creativity should be quantified.
Council response and Implications for the proposed plan	The Council has considered the impacts of tourism in the topic paper. The Council will need to consider how the Proposed Plan can support the tourist sector in a balanced way without negative effects on the city's historic heritage, its transport systems, its residential accommodation and impact on communities.
Is the agency content with the evidence?	Nature Scot does not dispute the evidence.
Areas of agreement	Not applicable
Outstanding issues	None
Actions for proposed plan stage	As set out above, the Council will take this matter into account when preparing the Proposed Plan.

Key Stakeholder	Homes for Scotland
Main views raised	**Final Topic Papers (March 2026):** Whilst the loss of homes to short-term lets has been mitigated through short-term letting controls, HFS considers this is important context for the Council in considering housing need and demand, and in setting the LHLR. Short-term lets contribute to meeting tourist requirements, therefore an appropriate allowance should be made for a percentage of new homes to not be the primary residence and potentially be used for STLs. Larger housing development may be able to create new 20 minute neighbourhoods which would complement NPF4 aspirations.
Council response and Implications for the proposed plan	The issues of STLs in the context of setting the LHLR has been addressed in Topic 12 Housing land.
Is the agency content with the evidence?	HFS does not dispute any of the evidence set out in the topic paper.
Areas of agreement	Not applicable
Outstanding issues	None
Actions for proposed plan stage	None in relation to this topic paper

Other engagement and matters raised

Economic Needs Study – Visitor Accommodation

As part of the process of preparing the Visitor Accommodation study, the consultants engaged with a number of stakeholders with interest in the visitor accommodation sector, including:

- City of Edinburgh Council – Business Growth and Inclusion, and Regulatory Services
- Forever Scotland
- Essential Edinburgh BID
- Edinburgh Chamber of Commerce
- VisitScotland
- Scottish Tourism Alliance
- Edinburgh Hotel Association

- Edinburgh International Conference Centre
- Festivals Edinburgh
- Edinburgh Airport
- Convention Edinburgh

Details of the comments are summarised in the study report, and taken into account in the analysis, summary and conclusions.

Economic Needs Study- Leisure

As part of the process of preparing the Leisure study the consultants engaged with a number of stakeholders with interest in the visitor accommodation sector, including:

- City of Edinburgh Council – Business Growth and Inclusion, and Regulatory Services
- Scottish Enterprise
- Scottish Futures Trust
- Essential Edinburgh BID
- Edinburgh Chamber of Commerce
- Federation of Small Businesses
- St James Quarter
- Edinburgh Leisure
- Capital Theatres
- Edinburgh Visitor Economy Partnership
- Ryden (commercial property agent)

Details of the comments are summarised in the study report, and taken into account in the analysis, summary and conclusions.

Summary of Implications for the Proposed Plan

The evidence shows that Edinburgh is a key tourist destination with a significant variety of cultural facilities attracting high numbers of visitors (from Scotland, the UK and internationally) and also providing a comprehensive offer for the city's residents. There are strong economic benefits from the tourist economy but also associated pressures that create problems that must be mitigated.

- The Council will have to consider how the spatial strategy, land allocations, and policies can support the sustainable growth and resilience of the tourism sector. In particular, there is a need to review the role and scope of the Council's visitor accommodation approach in terms of the best locations for additional accommodation and in light of new types of self-service accommodation.
- The Council will need to consider how the Proposed Plan can support the tourist sector in a balanced way without negative effects on the city's historic

environment, its transport systems, its residential accommodation and impact on communities.

- The evidence from the Visitor Accommodation study shows there is demand for a significant increase in the number of hotel bed spaces over the next ten years. The Council will explore the strategy options that may allow the Proposed Plan to support additional hotel development without compromising the need to deliver other important land use requirements.
- The evidence shows the leisure and cultural offering in Edinburgh is extensive and is a key sector of the economy providing facilities for both visitors and residents and consequently a range of employment opportunities. The Council will explore how the Proposed Plan can continue to support the success of the leisure and cultural sector.
- Whilst Edinburgh is well catered for in terms of the number and range of facilities and venues, there is not an even distribution across the city with facilities particularly clustered in and around the city centre. The Council will explore how the Proposed Plan can continue to support the success of the leisure and cultural sector through adequate provision of flexible community space to meet local needs and to help protect and retain existing provision.
- The evidence in the Place Profiles shows that there are gaps in the provision of community space. The Council will explore how the Proposed Plan can help to address any gaps in provision. Opportunities may be facilitated through the delivery alongside other forms of development, set out in the place-based approach of the Proposed Plan and delivery programme.

Statements of Agreement / Dispute

There are no substantive areas of dispute on the evidence. Points raised by key agencies or stakeholders have been addressed in revisions to topic papers or a response provided in the summary of engagement tables where applicable.

Evidence Report

June 2026

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