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The City of Edinburgh Council

By email: [Iain.McFarlane@edinburgh.gov.uk](mailto:Iain.McFarlane@edinburgh.gov.uk)

Our ref: A49286464  
10 September 2024

Dear Iain,

**Town and Country Planning (Scotland) Act 1997**  
**City of Edinburgh Local Development Plan 2 City Plan 2030 (as modified)**  
**Notice of Intention to Adopt – Direction**

I refer to your correspondence of 3 July 2024, regarding the City of Edinburgh Council's intention to adopt the proposed City of Edinburgh Local Development Plan 2 City Plan 2030 (as modified).

Scottish Ministers have decided that the proposed plan as notified is unsatisfactory and hereby direct, under section 20(5) of the Town and Country Planning (Scotland) Act 1997<sup>1</sup>, that City of Edinburgh Council consider modifying the proposed City of Edinburgh Local Development Plan 2, City Plan 2030 as indicated in the Annex to this Direction.

This Direction is considered necessary to ensure the LDP:

- takes account of the adoption of National Planning Framework 4 (NPF4) and that this replaces National Planning Framework 3 and Scottish Planning Policy;
- reflects the changed context with strategic development plans no longer being part of the development plan;
- fully reflects the reporters' recommendations set out in the Examination Report;
- provides accurate mapping; and
- is amended to correct points identified in the Annex to this direction letter.

Further, the direction in relation to policy HOU3 is considered necessary to improve alignment with NPF4, particularly in regard to meeting diverse housing needs of people and communities. The action looks to support the housing emergency and the action outlined in your authority's Housing Emergency Action Plan 2024-2029 (March 2024) to review current housing policies and strategies to maximise availability of housing across Edinburgh.

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<sup>1</sup> Section 20 is continued in effect to enable the constitution of local development plans in respect of which notice of the proposed local development plan was published in a local newspaper in accordance with regulation 12(2)(a) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008(1) before 12 February 2023 by regulation 4 of the Planning (Scotland) Act 2019 (Commencement No. 12 and Saving and Transitional Provisions) Regulations 2023 (SSI 2023/10).

The [Ministerial / Chief Planner letter](#) on housing, of June 2024, encourages diversification of tenure and reinforces that decision makers should weigh up all relevant policies and material considerations in applying balanced planning judgement. The letter indicates a range of information available on local housing matters, such as Local Housing Strategies and local authority housing emergency action plans, can be used to consider the extent to which a proposed development contributes to addressing recognised priorities of an area.

In making this Direction, Ministers strongly support the recommendation of Reporters that there is early preparation of a new local development plan and that this should be a priority for the Council, particularly in support of addressing the local housing emergency. It is important that the first round of new style local development plans are in place in a timely manner, and Ministers have set out their expectation for plans across Scotland to be in place by May 2028. Whilst this is the final plan progressing under transitional arrangements, its adoption, subject to meeting this direction, will be with the benefit of many aspects of NPF4 already having been taken into consideration. Your authority will also benefit from the experience of other authorities undertaking new plan procedures from which lessons can be learnt. This will enable the key focus of the new plan preparation to be on site allocations and their delivery.

Section 20(6)<sup>1</sup> provides (subject to any further direction under section 20) that your authority may not adopt the City of Edinburgh Local Development Plan 2 City Plan 2030 unless you satisfy Scottish Ministers that you have made the modifications necessary to conform with this direction, or the Scottish Ministers withdraw it.

Your authority has also provided updated mapping and made a commitment to update 'Map 2: Spatial Strategy (technical)' and 'Map 8: Transport Proposals and Safeguards' to clarify the route of the intended orbital bus route showing the extent of the orbital bus route ('Public Transport Proposals – Bus Improvements') and to identify that in West Edinburgh, it is also part of West Edinburgh transport improvements.

I would be grateful if you would confirm that your authority will modify the plan.

Yours sincerely

**Kristen Anderson**  
**Principal Planner**  
**Planning, Architecture and Regeneration Division**

## ANNEX Table of modifications

Written Statement		
Reference	Modification	Reason for modification
Front Cover	Update date from 'June 2024' to reflect month and year the LDP is adopted.	For the avoidance of doubt and for accuracy in relation to adoption date of the LDP.
Headers throughout	Update date from 'June 2024' to reflect month and year the LDP is adopted.	For avoidance of doubt and for accuracy in relation to adoption date of the LDP.
page 11, paragraph 2.7	Change reference to 'Climate Change (Scotland) Act 2019 Act' to Climate Change (Scotland) Act 2009	Correction of incorrect date/title for the <a href="#">Climate Change (Scotland) Act 2009</a>
page 12 para 2.14 (first sentence)	<b>Bolden words National Marine Plan</b> "The <b>National Marine Plan</b> published in 2015 provides the overarching policy framework for marine spatial planning and the sustainable development of inshore and offshore waters around Scotland."	For formatting consistency, in line with Reporter's recommendation 12.
page 17	<b>Add title for map</b> Map 3 - World Heritage Sites	For consistency, clarity and ease of use of plan.
page 19	<b>Add title for map</b> Map 4 - Conservation areas	For consistency, clarity and ease of use of plan.
page 19	<b>Update the Leith Conservation Area Boundary</b> to reflect the approved boundary extension.	To reflect the <a href="#">boundary extension</a> as approved by City of Edinburgh Council's Planning Committee on 23 February 2022.
page 20, paragraph 2.51	Replace Scottish Planning Policy reference from: " <del>Scottish Planning Policy</del> sets out the Government's approach to protecting <del>archaeological remains</del> and the weight to be given to archaeological considerations when assessing against the benefits of development."  Replace with " <b>NPF4 Policy 7 Historic assets and places</b> sets out the Government's approach to protecting <b>and enhancing historic environment assets and places</b> and the weight to be given to archaeological considerations when assessing against the benefits of development."	To reflect the changed context for the plan.
page 21	<b>Add title for map</b> Map 5 – Green Belt	For consistency, clarity and ease of use of plan.
page 23	<b>Add title for map</b> Map 6 – Green blue network	For consistency, clarity and ease of use of plan.

page 25, paragraph 2.78.	Amend reference to 'six AQMAs' to 'five AQMAs'  And remove reference to 'the Inverleith Row/Ferry Road junction'.	To reflect the correct number of current AQMAs, following the revocation of the Inverleith Row/Ferry Road junction' AQMA in March 2024.
page 28 City Plan Housing Land Requirement and Housing Land Supply table	Amend table so that the figure 36,750 is in the second column in the MATHLR row, rather than as it is currently positioned in the 'Anticipated land supply' row.	To reflect the reporter's recommendation, as set out on page 28 of Table of Modifications made.
page 28 para 2.98	Delete para 2.98 (previously para 2.110)  Update all subsequent paragraph numbers, and ensure correct cross referencing.	To reflect the reporter's recommendation, as set out on page 29 of Table of Modifications, to replace the entire text of paras 2.96-2.110 – with replacement text.  Matters covered in para 2.98 are now addressed within para 2.92.
page 30	Add title for map: "Map 8: Transport Proposals and Safeguards"	To reflect the reporter's recommendation, as set out on page 42, Rec 8 of Table of Modifications.
page 33	Add title for map Map 9 – Waste management facilities	For consistency, clarity and ease of use of plan.
page 33	Add title for map Map 10 – Economic Areas	For consistency, clarity and ease of use of plan.
page 37 paragraph 2.131 first sentence	Remove reference to Scottish Planning Policy. Revise as "City Plan, in line with National Planning Framework 4, continues to support the existing network of city, town and local centres."	To reflect the changed context for the plan.
page 37 paragraph 2.136	Remove reference to Scottish Planning Policy. Revise as "The retail policies continue to direct new development to existing centres, <del>with town centres being given priority over commercial centres in line with the town centres first approach, set out in Scottish Planning Policy</del> , as these centres are the most accessible and help provide a focal point for residents.	To reflect the changed context for the plan.
page 49 Map 19	Add key for Map 19	For consistency, clarity and ease of use of plan.
page 49 Final bullet under 'Mitigation Measures'	Add brackets as indicated "Prior to consent, developers will be required to agree the full scope of the ECoW (environmental clerk of works) role with the Planning Authority and in consultation with NatureScot."	For grammar / ease of reading, and in line with the reporter's recommendation (as set out in Table of Mods – point 6 on page 9.)
o paragraph 3.27 (page 50)	Update all references to use class 1 and 2 with use class 1A	To reflect the new use class, which combined use classes 1

<ul style="list-style-type: none"> <li>○ paragraphs 3.30 &amp; 3.31 (page 51)</li> <li>○ paragraph 3.32, (page 52)</li> <li>○ West Shore Development Principle a, (page 53)</li> <li>○ Place 5 Royal Victoria Development Principle b, (page 54)</li> <li>○ Place 9 West Bowling Green Street Development Principles c (page 62)</li> <li>○ Place 11, Newhaven Road 2 Development Principles c,(page 64)</li> <li>○ Place 12 Bangor Road Development Principle c, (page 65)</li> <li>○ Place 13 South Fort Street Development Principle c, (page 66)</li> <li>○ Place 25 Gorgie Road East Development Principles c, (page 86)</li> <li>○ Place 26 Stevenson Road (A) Development Principle c, (page 86)</li> <li>○ Place 28 Murrayburn Road Development Principle c, (page 90)</li> <li>○ Place 29 Dumbryden Drive Development Principle c (page 91)</li> </ul>		<p>(shops) – and 2 (financial, professional and other services) to form a single use class <a href="#">The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Miscellaneous Amendment Order 2023 (legislation.gov.uk)</a></p>
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page 76 Development principle t. b.	Change colon at end of subsection b to a full stop.	Grammatical correction - in line with reporter's recommendation.
page 100, Place 35 Moredunvale Road paragraph 3.97 (final sentence of para)	Replace reference to <b>Redford Barracks</b> with <b>Moredunvale Road</b> .	To replace incorrect reference to unrelated site Redford Barracks, and refer to the correct development principles for Place 35 Moredunvale Road.
page 112, paragraph 3.147	Amend: "Sites of Special Scientific Interest (SSSIs) are areas of land (including land covered by water) which are considered by <b>Scottish Natural Heritage (SNH)</b> to be of special interest..."  Revise as "Sites of Special Scientific Interest (SSSIs) are areas of land (including land covered by water) which are considered by <b>NatureScot</b> be of special interest..."	To reflect the current operating name of Scottish Natural Heritage.
page 123 Policy Hou 3	<b>Insert as criterion a: "they address local housing priorities by meeting identified gaps in provision," and amend labelling of other criteria accordingly.</b>	To reflect NPF4 and support the declared housing emergency.
page 124 Para 3.202	<b>Move the text from within new para 3.202 and add to the end of para 3.200 as intended by the reporter.</b>	To reflect reporter's recommendation.
pages 124-144	<b>Amend subsequent paragraph numbers in Part 3 of the plan.</b>	Consequential change to update paragraph numbering.
page 126 Policy Inf 3 paragraph after policy principle e)	<b>Add asterisk to paragraph after policy principle e), unbold the text and make italic</b>	For formatting consistency – text is not a type of infrastructure to be provided in the same way as points a) - e), but rather reflects the asterisk in second paragraph of Policy Inf3 at bottom of page 125
page 191 Table 14 Meadowbank row	<b>Delete text ' Role and Character' from Meadowbank row.</b>	To remove unnecessary duplication / repeat of column heading.
page 191 Table 14 Meadowbank row	<b>Delete from second column (' Role and Character'):</b> "Current Commitments and Future Role - Permission granted in 2021 to allow change of use of a retail unit from comparison to convenience goods. Scope for future reconfiguration or enhancement."  <b>Replace text in third column (Current Commitments and Future Role) with</b>	To reflect reporter's recommendation. (see page 44(Rec 5)) of Table of Modifications made)

	“Permission granted in 2021 to allow change of use of a retail unit from comparison to convenience goods. Scope for future reconfiguration or enhancement.”	
page 202 ,Part 5, Appendix B,  local centres: Portobello entry/row	<b>Delete:</b> “Stockbridge 2 -10 Portobello Baker’s Place, 1-21 Comely Bank Road, 1-6 Glanville Place, 6-62 Hamilton Place, 11-20 North West Circus Place, 1-77 Raeburn Place, 2&3 St Stephen Place, 2-78 St Stephen Street, 5-7 Baker’s Place, 2-36 Deanhaugh Street, 8 Gloucester Street, 9-11 Mary’s Place, 34-36 North West Circus Place, 2-110 Raeburn Place, 7-63 St Stephen Street	Remove references to streets which are in Stockbridge local centre.

<b>Appendix D: Technical requirements for housing proposals</b>		
<b>Reference</b>	<b>Modification</b>	<b>Reason for modification</b>
Front Cover	Update date from ‘June 2024’ to reflect month and year the LDP is adopted.	For accuracy in relation to adoption date of the LDP.
Contents page Page 1 Page number identification for Table 2	Amend page from 4 to 5	For accuracy and ease of reference.
page 3 Table 1 H80	Rename site name from ‘Murrayburn Road’ to ‘Murrayburn Road (Place 28)’  And amend prefix from H80 to OPP80	To reflect reporter’s recommendation. (see page 18 (Rec 4)) of Table of Modifications made)
page 3 Table 1 OPP81	Rename site name from ‘Drumbryden Drive’ to ‘Dumbryden Drive’ (Place 29)	To reflect reporter’s recommendation. (see page 18 (Rec 4)) of Table of Modifications made)
page 4 Table 1 OPP77	Revise site name to Gorgie Road East (Place 25)	To reflect reporter’s recommendation. (see page 18 (Rec 4)) of Table of Modifications made)
page 4 Table 1	Amend site reference H80 Broomhouse Terrace to correct reference number H79 Broomhouse Terrace Place 27	For consistency with plan and proposals map.
page 4 Table 1	Add the letter ‘Y’ under column ‘Flood Risk Assessment’ for H79 Broomhouse, Place 27 in Appendix D.	To reflect reporter’s recommendation. (see page 19 (Rec 9)) of Table of Modifications made)
page 36 Table 2 H64 Land at Ferrymuir	Rename site / amend site prefix as opportunity site OPP64	To reflect reporter’s recommendation. (see page 17(Rec 17)) of Table of Modifications made)

Written Statement: Appendix E: Glossary		
Reference	Modification	Reason for modification
page 207  'Housing Land Audit and Completions Programme' definition	Amend definition of Housing Land Audit and Completions Programme to remove reference to Strategic Development Plan (SDP) and housing supply.  Delete text from after the word 'supply' at end of second sentence of definition to read:  "The HLACP records the amount of land available for house building, identifies any constraints affecting development and assesses the adequacy of the land supply."	To reflect the changed context for the plan.
page 208  'Non-Shop Uses' definition	Amend term defined and definition to accurately reflect changes to the Use Class Order.  <a href="#">The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Miscellaneous Amendment Order 2023 (legislation.gov.uk)</a>	To reflect the new use class 'shops and financial, professional and other services' which combined use classes 1 (shops) – and 2 (financial, professional and other services) to form a single use class <a href="#">The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Miscellaneous Amendment Order 2023 (legislation.gov.uk)</a>
page 209  'SSSI' definition	Replace reference to "SNH" with "NatureScot".	To reflect the current operating name of Scottish Natural Heritage.
page 209  'Strategic Development Plan' definition	Amend as shown "In Scotland's four city regions, Strategic Development Plans provided a long-term vision, a spatial strategy and strategic policies. <del>It informs Local Development Plans.</del> These ceased to have effect on 13 February 2023, and are no longer part of the development plan.	To reflect the changed context for the plan / status of SDPs.

Proposals Maps		
Reference	Modification	Reason for modification
Proposals Map: North East	<a href="#">Update the Leith Conservation Area Boundary</a> to reflect the approved boundary extension.	To reflect the <a href="#">boundary extension</a> as approved by City of Edinburgh Council's Planning Committee on 23 February 2022.
Proposals Map: North West	<a href="#">Amend the boundary of the open space designation around 19 Inveralmond Drive</a> to be the same as the boundary in the 2016 LDP Proposals Map	For clarity in the extent of this area of open space.
Proposals Map: North West Place 16	<a href="#">Relocate 'Proposed New Centre' (purple star symbol northwards to be in line with Map 24 of Written Statement</a>	To reflect reporter's recommendations Issue 006, No 28, as on page 17 of Table of Modifications table, to match with Map 24. "Amending the



	Add 'local centre' boundary outline in line with Map 24 of Written Statement	Proposals Map to include the corresponding symbols for the new town and local centres in Place 16 in order to reflect the relevant modifications above".
Proposals Maps: North East, North West, South East, South West	Update all Local Nature Conservation Site boundaries to correct errors.	To ensure accuracy of mapping of Local Nature Conservation sites.