

Action Party response to the Seafield part of City Plan 2030: Ensure a lively sister community not a dead weight development

We welcome the chance for everyone to input into the Seafield proposals (pages 69-70) in the [2030 City Plan](#) ahead of the 5pm, 20th December 2021 deadline, so that the community can help determine the process and outcome. The community – from eastern Leith to Craighentiny to Portobello - will live with the outcome of this process. We have the greatest interest in ensuring an excellent rather than sub-standard development.

For people in Portobello, Seafield is an extension of Porty because the beach makes for a continuity. What happens at Seafield impacts our beach, Prom, High Street, facilities and community. A bad development (whether piecemeal or mass density or without community provision) is going to be a lot worse for Portobello. A good development would be a welcome sister community. We need to ensure we don't have a narrow consultation process, but one which has sufficient community input and so can have an excellent community outcome.

The Scottish Government is aware that communities need to help shape such processes to guarantee successful outcomes. Action Party, for example, can help ensure local peoples insights and professional skills shape the Place Brief and Masterplan processes in the same way Action Party helped shape the Making Places process at the Westbank/ Pitz/ Tumbles site.

Action Party makes the following points:

(1) Process – development at Seafield requires a stronger community steer:

- (i) **Place Brief:** Establish a community-led body to prepare a Place Brief for the site. A Place Brief should have been developed in collaboration with the community to feed into the Seafield proposals in the City Plan (as has happened elsewhere in the city). The wider community – including through Action Party - needs stronger input into shaping the Place Brief which will set the parameters for the Masterplan.
- (ii) **No development should take place until the Masterplan is produced:** Currently the process may leave developers a window to push on after the site brief stage.
- (iii) **No informal consultation between landowners/ developers and council/ planners** should take place in parallel with the Place Brief or Masterplanning processes, or else it needs parallel input - or oversight - by all relevant community representatives.

(2) Substance – Seafield requires a community-centred comprehensive holistic approach:

- (i) **We would welcome** a joined-up environmentally-sensitive, socially-inclusive community development at Seafield that creates a vibrant sister community.
- (ii) **We would thoroughly oppose** any process leading to a negative development, and Portobello has a lot of experience of developments being negative in their impact, e.g. being dense housing without green space or community provision.

Positively: Seafield needs to be developed as a coherent sister community neighbourhood, designed so residents can meet their day-to-day needs within a 20 minute round trip walk from their home; including through access to safe walking and cycling routes and by public transport.

Negatively: We already have a huge amount of housing being put in in and around Portobello, and have depressing examples of 'housing-led development' undertaken by the private sector that don't have sufficient amenities or green space and instead put pressure on Portobello. For example the development at Fishwives Causeway where individual properties may be pleasant, but the first thing that was built was an Aldi supermarket with associated parking which takes up an inordinate amount of valuable space, attracts car traffic and sucks money out of the neighbourhood. The rest of the development is dense and over-developed with limited play space. It lacks both facilities and character, with no attempt to create a pleasant walkway to Portobello itself.

Given our lived experience we expect that a development that is responsive to the 7 points below would be welcome, and one that is not would be strongly resisted by the community:

1. **Housing that is climate resilient and responsive:** (i) Instead of exclusive and unaffordable housing, we need inclusive and affordable new homes, with taller buildings on the inner (south) side of Seafield Rd and lower by sea. (ii) Instead of mass building of identikit private or social housing, in places like Germany 20% of such developments are constructed through self-build – this doesn't mean individual families build homes but that each home is built to meet specific peoples' needs. This can be in the form of co-housing, small scale housing cooperatives, or a community organisation like Action Party owning the land and people only owning the building so homes retain their affordability and can be sold on within the community. (iii) Build homes to Passivhaus standards, or to adequate thermal efficiency to allow for low/zero carbon heating e.g. using waste heat from adjoining water treatment works.
2. **Transport:** a design led approach (i) to change the character/ traffic speeds of Seafield Road, by narrowing and by providing numerous crossing points to ensure connectivity for walking/wheeling; (ii) good public transport (e.g. Portobello to Leith buses, and safeguard the railway track so Portobello/ Seafield can link with the tramline at Leith)
3. **Community infrastructure:** a new school and facilities centrally located, focussed on a neighbourhood centre and transportation hub; including GP surgery, small workspaces and small retail spaces to compliment local business rather than compete with it.
4. **Green space:** open community green spaces and recreational space that faces the sea at the heart of the community, linking to Prom and diverse habitats.
6. **Coast, nature and climate change:** ensure net biodiversity gain, play a transformational role in creating and enhancing ecological networks and connectivity e.g. by creating soft landscaping and appropriate habitat that ensures a living seaside for people and nature. The coastline to and through Portobello should be resilient and adapted to climate change. Any development at Seafield should not exacerbate storm impacts on Portobello Beach.

7. **Prom and beach:** deliver a renewed and sustainable Seafield prom, e.g. (i) a lower prom could provide for enhanced human and ecological connectivity, and include picnic tables, space for ad hoc sports; and (ii) an upper prom could be school, nursery, with pathways into the community with workspaces, cafes, temporary buildings, and a public square at Seafield intersecting with the Prom.
8. **Integrated development:** No development unless an overall Masterplan is approved by the wider community, a plan that includes both south and north sides of Seafield road.

Responding to the Seafield part of Edinburgh Council’s City Plan 2030

*Deadline to respond to the Seafield part of the **City Plan 2030** is 5pm Monday 20th December. The key pages are 69 - 70, and state that “Planning permission will be granted for development within the boundary of Seafield, as defined on the Proposal Map, provided it accords with a Place Brief, a flood risk and coastal erosion appraisal, the Seafield Site Development Principles and an approved master plan” It then goes on to outline the process and principles.*

Action Party’s proposed changes to the CITY PLAN 2030 are in [italic underlined] below:

CITY PLAN 2030 – Proposed plan September 2021

Place 15 Seafield

Planning permission will be granted for development within the boundary of Seafield, as defined on the Proposal Map, provided it accords with a Place Brief, a food risk and coastal erosion appraisal, the Seafield Site Development Principles and an approved master plan.

3.45 The Council will prepare a Place Brief for the site. The Place Brief will establish high level principles to inform future master planning and design processes. The Place Brief must consider the implications of flood risk and erosion in the area and be informed by a flood risk and coastal erosion appraisal which develops options which can be supported by the Council. The implications of flooding and coastal erosion should be used to inform the development of this site. Development at Seafield should provide or contribute towards education, and healthcare infrastructure and community facilities.

3.46 Local communities and key stakeholders will be consulted through the development of the Place Brief. Once approved [INSERT: by the community and the council] the Place Brief will become non-statutory planning guidance. Proposals for any part of this site in advance of an approved Place Brief [INSERT: and Masterplan] will be considered as premature in line with Policy Env 2. Proposals will also be assessed against the Seafield Development Principles and other relevant local plan policies, for example on matters such as design, accessibility, landscaping and biodiversity. [INSERT: Any consultations between landowners/ developers and council/ planners during the Place Brief or Masterplanning processes should be transparent or be accompanied by parallel input - or oversight - by all relevant community reps.]

3.47 Development at Seafield Industrial Estate must not have an adverse effect on qualifying interests of the Firth of Forth Special Protection Area (SPA) and the Outer Firth of Forth and St Andrews Bay Complex SPA.

Seafield Development Principles

The requirements in principle will be:

- a. [INSERT: An inclusive and affordable community-led] housing mixed use urban extension with a sense of community that can connect with neighbouring areas and the wider city. [INSERT: A holistic community development that only proceeds if it includes the whole site (both south and north of Seafield Road) and if the overall Masterplan is approved by the wider community.]
- b. Appropriate mass, scale, height and layout of new development, having regard to views to it from the Firth of Forth, [INSERT: with taller buildings on the inner (south) side of Seafield Rd and lower by sea]
- c. Ensure all homes are adequately served by play facilities and have access to open space in line with the Council's Open Space Strategy and proposal BGN57. [INSERT: Instead of mass building of identikit private or social housing, ensure each home is built to meet specific peoples' needs (in the form of co-housing, small scale housing cooperatives, or a community organisation like Action Party owning the land and people only owning the building so homes retain their affordability) Ensure Passivhaus standards, or adequate thermal efficiency to ensure low/zero carbon heating e.g. using waste heat from adjoining water treatment works.]
- d. Deliver a SUDS solution to serve both the site and surrounding area in line with Proposal BGN9
- e. Provision of sustainable travel infrastructure, including where possible use of existing rail infrastructure [INSERT: such as by safeguarding the railway track so Portobello/ Seafield can link with the tramline at Leith]
 - a. Mobility Hub
 - b. Edinburgh Promenade upgrade and safe connections and safe crossing of Seafield Road East. [INSERT: Change the character/ traffic speeds of Seafield Road, by narrowing and by providing numerous crossing points to ensure connectivity for walking/wheeling]
 - c. New active travel route: City Centre along Portobello Road/London Road.
 - d. New Active Travel Route: Along Seafield Road and connection to Craigentiny Avenue via Fillyside
 - e. New Active Travel Route: Along Seafield Road and Portobello High Street
 - f. Active Travel connections through Harry Lauder Junction. New public transport route: Seafield Road [INSERT: connecting] to Leith [INSERT: and Portobello, e.g. Portobello to Leith buses.]
 - h. Provide or contribute towards education, and healthcare infrastructure and community facilities. [INSERT: Build a new school and facilities centrally located on a neighbourhood centre and transportation hub; including GP surgery, small workspaces and small retail spaces to compliment local business rather than compete with it.]
[INSERT: f. Open community green spaces and recreational space that faces the sea at the heart of the community, linking to Prom and diverse habitats. Ensure net biodiversity gain with a living seaside. Sea defences at Seafield should not exacerbate storm impacts on Portobello Beach.]
[INSERT: g. Deliver a renewed and sustainable Seafield prom, e.g. a lower prom could provide for enhanced human and ecological connectivity, and include picnic tables, space for ad hoc sports; and an upper prom could be school, nursery, with pathways into the community with workspaces, cafes, temporary buildings, and a public square at Seafield intersecting with the Prom.]