

Notice of meeting and agenda

Planning Committee

9.00 am Wednesday, 18th March, 2020

Dean of Guild Court Room - City Chambers

This is a public meeting and members of the public are welcome to attend

Contacts

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1. Order of Business

- 1.1 Including any notices of motion and any other items of business submitted as urgent for consideration at the meeting.

2. Declaration of interests

- 2.1 Members should declare any financial and non-financial interests they have in the items of business for consideration, identifying the relevant agenda item and the nature of their interest.

3. Deputations

- 3.1 If any

4. Minutes

- 4.1 Planning Committee of 26 February 2020 - submitted for approval as a correct record 7 - 12

5. Business Bulletin

- 5.1 Planning Committee Business Bulletin

6. Development Plan

- 6.1 None.

7. Planning Policy

- 7.1 Scottish Government Call for Ideas National Planning Framework 13 - 42
4 – Report by the Executive Director of Place

8. Planning Process

- 8.1 None.

9. Planning Performance

- 9.1 None.

10. Conservation

- 10.1 None.

11. Motions

- 11.1 None.

Laurence Rockey

Head of Strategy and Communications

Committee Members

Councillors Councillor Neil Gardiner (Convener), Councillor Maureen Child (Vice-Convener), Councillor Chas Booth, Councillor Mary Campbell, Councillor George Gordon, Councillor Joan Griffiths, Councillor Max Mitchell, Councillor Joanna Mowat, Councillor Hal Osler, Councillor Rob Munn and Councillor Cameron Rose

Information about the Planning Committee

The Planning Committee consists of 11 Councillors and is appointed by the City of Edinburgh Council. The Planning Committee usually meets in the Dean of Guild Court Room in the City Chambers on the High Street in Edinburgh. There is a seated public gallery and the meeting is open to all members of the public.

Further information

If you have any questions about the agenda or meeting arrangements, please contact Veronica Macmillan, Committee Services, City of Edinburgh Council, Business Centre

2.1, Waverley Court, 4 East Market Street, Edinburgh EH8 8BG, Tel 0131 529 4283, email veronica.macmillan@edinburgh.gov.uk.

A copy of the agenda and papers for this meeting will be available for inspection prior to the meeting at the main reception office, City Chambers, High Street, Edinburgh.

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Minutes

Planning Committee

2.00pm, Wednesday 26 February 2020

Present

Councillors Gardiner (Convener), Child (Vice-Convener), Booth, Gordon, Griffiths, Mitchell, Mowat, Munn, Osler and Rose.

1. Minutes

Decision

To approve the minutes of the Planning Committee of 22 January 2020 and 29 January 2020 as a correct record.

2. Business Bulletin

The Committee's Business Bulletin for 26 February 2020 was presented.

Decision

- 1) To note the Business Bulletin.
- 2) To agree to report to Committee on the results of the Scottish Government external customer satisfaction survey on Building Standards Performance on a yearly basis.
- 3) To thank officers for their endeavors in terms of improving the performance within building standards.
- 4) To thank officers for improvements made within the enforcement service.

(Reference – Business Bulletin, submitted)

3. Edinburgh Local Development Plan: Action Programme

Approval was sought for the adoption, publication and submission to Scottish Ministers of the Edinburgh Local Development Plan (LDP) Action Programme.

Planning Authorities were required to prepare an Action Programme setting out how their Local Development Plan (LDP) would be implemented and to publish an updated Action Programme at least every two years.

Decision

To approve the adoption, publication and submission to Scottish Ministers of the Edinburgh Local Development Plan (LDP) Action Programme appended to the report.

(References – Planning Committee, 23 January 2019 (item 2); report by the Executive Director of Place, submitted)

4. Supplementary Guidance on Developer Contributions and Infrastructure Delivery - Update

Details were provided of the Scottish Ministers' direction to Council not to adopt statutory Supplementary Guidance (SG) that had been submitted by the Council. The first version of the SG had originally been published in December 2016.

The report set out the background to, and analysis of, the implications of the Ministerial decision.

Decision

- 1) To note the Scottish Ministers' direction not to adopt and issue the Council's Supplementary Guidance (SG) on Developer Contributions and Infrastructure Delivery.
- 2) To agree that officers would prepare non-statutory supplementary planning guidance on developer contributions to primary healthcare infrastructure, taking account of the Ministers' decision, with a target to report back to Planning Committee in May 2020.
- 3) To agree that officers reviewed the evidence used for education and transport contribution calculations and assessed what needed to be done to establish an agreed methodology and outputs in collaboration with Scottish Government planners, to inform the Council's response to the Scottish Ministers' decision. This could include for the preparation of new statutory SG on education and transport contributions.

(References – Planning Committee, 27 February 2019 (item 3); report by the Executive Director of Place, submitted)

5. Regional Spatial Strategy, City Region Deal Regional Growth Framework and National Planning Framework 4

Committee considered a report that detailed the Scottish Government's request that planning authorities worked on draft proposals for Regional Spatial Strategies to inform draft National Planning Framework 4 (NPF4), scheduled to be published in Quarter 3 of 2020. The Council therefore needed to be part of the proposed joint working considered and noted by SESplan Joint Committee and Planning Committee, continuing with SESplan until permanent and formal governance arrangements were agreed in accordance with secondary legislation and Scottish Government guidance.

Decision

- 1) To note the response of the Edinburgh and South East Scotland City Region Deal Executive Board to the proposed South East Scotland Strategic Development Plan (SESplan) Joint Committee proposals to provide a coordinating function and planning input to the preparation of a Regional Growth Framework for the City Region Deal and a Regional Spatial Strategy

for the South East Scotland area in respect of the Scottish Government's preparation of a draft National Planning Framework 4 (NPF4).

- 2) To agree that the Council should work with the SESplan authorities to prepare the above documents.
- 3) To note that these working arrangements would be reviewed in relation to outcomes of the Scottish Government's work on NPF4 and provisions for Regional Spatial Strategy working.

(References – Planning Committee, 2 October 2019 (item 3); report by the Executive Director of Place, submitted)

6. Granton Waterfront Development Framework

Approval was sought for the Granton Waterfront Development Framework as non-statutory planning guidance to guide development, service delivery and investment decisions for the regeneration of Granton Waterfront.

Decision

- 1) To approve the Development Framework for Granton Waterfront as non-statutory planning guidance detailed in Appendix 1 of the report.
- 2) To thank officers for the work done to date on the Granton project.

(References – North West Locality Committee, 19 June 2018 (item 12); report by the Executive Director of Place, submitted)

7. Annual Review of Guidance

Committee considered a report that detailed changes to planning guidance in 2019 and sought approval for the programme for the coming year and for minor updates to certain guidelines.

Decision

- 1) To note progress in consolidating and updating guidance for users of the planning service detailed in Appendix 1 of the report.
- 2) To approve the updates to certain guidelines detailed in Appendix 2 of the report.
- 3) To approve the programme for work in 2020 as detailed in Section 4 of the report.

(References – Planning Committee, 14 March 2018 (item 5); report by the Executive Director of Place, submitted)

8. Edinburgh Urban Design Panel Annual Report

Information was provided on the findings from the annual review of the Edinburgh Urban Design Panel's work.

Decision

- 1) To note the findings of the Edinburgh Urban Design Panel's annual review.

- 2) To thank the panel members for their voluntary contributions to the design review process.
- 3) To agree that Scottish National Heritage was invited to become part of the core membership of the Panel.

(Reference – report by the Executive Director of Place, submitted)

9. Scottish Government Consultation on Planning Performance and Fees – Proposed Response

Committee considered a report advising that Scottish Ministers had consistently linked increases in planning fees to improved performance. To support authorities that were moving closer to full cost recovery, the Scottish Government were required to recognise the need to increase fees across application types to reflect the level of work involved. In addition, the City of Edinburgh Council supported the provision of a suite of discretionary charges at a national level that the Planning Service could draw upon to resource the services it provided. The consultation response supported this position and would help inform the Scottish Government's amendments to the planning fees.

Approval was sought for the Council's response to the Scottish Government's consultation on Planning Performance and Fees 2019.

Decision

- 1) To approve the content of the consultation response detailed in Appendix 1 of the report.
- 2) To agree that this would be sent to Scottish Government as the City of Edinburgh Council's formal response to the Consultation on Planning Performance and Fees 2019.

(References – Planning Committee, 15 May 2019 (item 5); report by the Executive Director of Place, submitted)

10. Legal Review of Council Planning Processes

Approval was sought for a further period, until no later than 5 August 2020, to complete the Independent Review of Council Planning processes and report on the findings and recommendations.

Decision

- 1) To note the progress that had been made on the requested Independent Review and the anticipated timescales for its completion.
- 2) To approve that the completed review be reported to the soonest possible Committee following receipt by the Council's Head of Legal and Risk of the report by the independent solicitor, being no later than the Committee of 5 August 2020.

(References – Act of Council (No.18), 24 October 2019; report by the Executive Director of Resources, submitted)

11. Marchmont, Meadows and Bruntsfield Conservation Area Character Appraisal Review

Details were provided of the revised Marchmont, Meadows and Bruntsfield Conservation Character Appraisal (CACA) which updated the content and brought it into line with other more recent CACAs.

The revised appraisal had been the subject of consultation with Historic Environment Scotland, Marchmont and Sciennes Community Council and the Southside Community Council. No changes were proposed to the Conservation Area boundary.

Decision

To approve the revised Marchmont, Meadows and Bruntsfield Conservation Area Character Appraisal.

(References – Planning Committee, 22 August 2018 (item 12); report by the Executive Director of Place, submitted)

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Planning Committee

9.00am, Wednesday, 18 March 2020

Scottish Government Call for Ideas for National Planning Framework 4

Executive/routine	Executive
Wards	All
Council Commitments	1, 2, 4, 6 10, 11 12, 14,16, 18, 26

1. Recommendations

1.1 It is recommended that Committee:

- 1.1.1 notes the Edinburgh and South East Scotland City Region Deal (ESESCRD) Joint Committee decision at its meeting of 6 March 2020 to approve the Edinburgh and South East Scotland Regional Response to National Planning Framework 4 – Call for Ideas (Appendix 1) as the region’s response to the Scottish Government’s Call for Ideas for National Planning Framework 4 (NPF4);
- 1.1.2 considers the verbal update to be given on the decision of the South East Scotland Strategic Development Plan Authority (SESplan) Joint Committee on that regional response document at its meeting of 16 March 2020;
- 1.1.3 agrees that officers progress that work with SESplan and ESESCRD Joint Committees to produce an indicative Regional Spatial Strategy and Regional Growth Framework in terms of the report to Planning Committee of [26 February 2020](#) for submission to the Scottish Government in respect of NPF4, to be brought to committee for approval prior to June; and
- 1.1.4 agrees that officers, in consultation with the Convenor and Vice-Convenor, finalise a submission for the Call for Ideas from City of Edinburgh Council on Housing and policy matters as set out in the draft Response to Call for Ideas – NPF4 (Appendix 2).

Paul Lawrence

Executive Director of Place

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Scottish Government Call for Ideas for National Planning Framework 4

2. Executive Summary

- 2.1 In January 2020, the Scottish Government published a Call for Ideas for National Planning Framework 4 (NPF4) as part of its engagement with Local Authorities and other stakeholders to inform a draft NPF4. Under the Planning (Scotland) Act 2019 the NPF will become a statutory part of the development plan, will include housing targets and will incorporate a revised Scottish Planning Policy.
- 2.2 The Council as Local Authority and as part of the SESplan Joint Committee must therefore provide appropriate strategic planning and policy input to this process to ensure its interests are appropriately represented.
- 2.3 The Council must also submit its own response in relation to housing targets and policy for NPF4.

3. Background

- 3.1 Under provisions of the Planning (Scotland) Act 2019 the current statutory strategic plan regime and the authorities responsible for them will be abolished, likely to be when NPF4 is approved by Parliament for publication as a statutory part of the development plan. Strategic development plans will be replaced by Regional Spatial Strategies. Whilst these will not be a statutory part of the Development Plan, there is requirement for the NPF to have regard to the content of them. The Scottish Government's work programme schedules publication of guidance on Regional Spatial Strategies for Quarter 4 of 2021, with acceptance that there will be none approved before the draft of NPF4 and its subsequent consultation process.
- 3.2 The Scottish Government has therefore requested that planning authorities work on draft proposals for Indicative Regional Spatial Strategies to inform draft NPF4, scheduled to be published in Quarter 3 of 2020. The Planning Committee agreed to be part of the proposed joint working of the SESplan and ESESCRD Joint Committees and SESPlan Project Board to work on an Indicative Regional Spatial Strategy and a draft Regional Growth Framework as a commencement of regional working arrangements under the new legislation until permanent and formal governance arrangements are agreed in accordance with secondary legislation and Scottish Government guidance.

- 3.3 The Scottish Government intends to publish NPF4 in draft in Quarter 3 of 2020 at which point it will be subject to parliamentary scrutiny and then to a period of representation, before a revised draft is brought to parliament for approval and adoption in 2021.

4. Main report

- 4.1 Potential Indicative Regional Spatial Strategy and Regional Growth Framework inputs to NPF4 have been considered by officers through the SESplan Project Board, the Regional Growth Framework Thematic Leads (with a focus on spatial planning) and the ESESCRD Directors.
- 4.2 The output of this work is contained in Appendix 1 (Appendix 1.1) to this report, with a focus on existing and potential national status developments, significant City Region Deal projects and Local Development Plan outcomes creating growth, housing demand and infrastructure needs.
- 4.3 The implications of the locations of growth and their relationship to areas of SIMD, to existing infrastructure and the capacity and carbon impacts of that infrastructure define the following:
- 4.4 In summary there is a requirement to address past issues in providing appropriate regional, cross-boundary infrastructure capacity together with a need to address the requirements of growth and to move to carbon neutrality.
- 4.5 Given the tight timescales for this work and submitting it to the Scottish Government, updates on the decision by the SESplan Joint Committee will be partially given by verbal update where they cannot be part of the agenda report.
- 4.6 In addition to these regional issues and potentials, Edinburgh's own submission must address housing and policy matters so as to ensure that input to NPF4 will set out the case for growth, infrastructure needs and policy change for the revised Scottish Planning Policy.
- 4.7 Choices for City Plan 2030, currently out to consultation, sets out the options, including preferred approach, to housing targets, development strategy, development sites and a significant review of Local Development Plan (LDP) policy, all of which seek to progress on matters of sustainable development, housing availability and affordability and connectivity in line with Scottish Planning Policy objectives. The City Mobility Plan (CMP) is also out for consultation and sets out a strategy for a de-carbonised and connective public transport in the city, together with significant active travel opportunities and demand management for private vehicle traffic, to address sustainability, congestion and air quality issues.
- 4.8 Choices and CMP draw as relevant from the Council's previous decisions on committing to build 20,000 affordable homes and to becoming carbon neutral by 2030. As consultation documents they cannot be seen as the Council's final word on development and transport going forward, however, they are a strong vision and basis for meeting Council and Scottish Government housing and transport objectives. As the timescales for submission to the Call for Ideas doesn't allow for wider consultation

on this Council submission, a considered expression of housing targets and strategy and policy initiatives is a reasonable approach, as set out in Appendix 2.

- 4.9 In addition to this the Council should promote consideration of resolving long standing national questions in respect of assessment of housing land supply and infrastructure funding, both of which have been the subject of government objectives without any resolution or basis for consistency being reached. Clarity and consistency on these matters would enable the Council and other local authorities, to plan more effectively for housing and infrastructure as NPF4 becomes a significant material consideration in the planning process.

5. Next Steps

- 5.1 The report and appendices will be submitted to the Scottish Government in respect of NPF4.

6. Financial impact

- 6.1 The report sets out housing targets and policy proposals and does not directly impact on resources other than as set out for Choices for City Plan 2030.
- 6.2 The work on Indicative Spatial Strategy is being met from existing resources.

7. Stakeholder/Community Impact

- 7.1 The proposals in Choices are currently being consulted on and the draft NPF4 will be consulted on, further iterations will take account of these consultations.

8. Background reading/external references

- 8.1 [Scottish Government National Planning Framework engagement.](#)

9. Appendices

- 9.1 Appendix 1 - South East Scotland Regional Response to NPF4 Call for Ideas.
- 9.2 Appendix 2 - National Planning Framework 4 Call for Ideas.

Edinburgh and South East Scotland City Region Deal Joint Committee

10 am, Friday 6 March 2020

ESES Regional Response to National Planning Framework 4 “Call for Ideas”

Item number

Executive Summary

Appended to this report is the suggested ESESCR Deal Joint Committee response to the National Planning Framework 4 “Call for Ideas”. This response has been endorsed by the City Region Deal Executive Board.

It is recommended that the Joint Committee approves this response, subject to ratification by individual Councils, the SESplan Joint Committee and SEStran, before it is submitted to Government formally on 31 March.

Monica Patterson

Chief Officer, Edinburgh and South East Scotland City Region Deal

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ESES Regional Response to National Planning Framework 4 “Call for Ideas”

1. Recommendations

- 1.1 It is recommended that the Joint Committee approves this response, subject to ratification by individual Councils, the SESplan Joint Committee and SEStran, before it is submitted to Government formally on 31 March.

2. Background

- 2.1 On [3 September 2019](#), Joint Committee agreed to prepare a Regional Growth Framework (RGF) in order to assist delivery of greater alignment across planning, housing, transport and economic development, and thereby maximise the regional inclusive growth outcomes that are central to the ESESCR Deal. It was also agreed that The RGF will inform the production of a future Regional Spatial Strategy (RSS).
- 2.2 Since then, the regional partners established a Project Team to develop the RGF, with Thematic Leads for: Sustainability, Economy, Transport & Infrastructure, Spatial Planning and Housing. A draft RGF now exists and is on track to be completed for summer 2020.
- 2.3 On 9 January 2020, Scottish Government announced that the early engagement period for National Planning Framework 4 (NPF4) was underway, to help gather ideas to inform the draft NPF4 that will be published for consultation in September 2020. A deadline for “Call for Ideas” on what the priorities should be for NPF4 was set for 31 March. The Executive Board agreed that main themes in the RGF draft should form part of the ESESCR Deal response, to give a clear agenda for the region and form the basis for more detailed work to be carried through the RGF and RSS, once the outputs of the NPF4 Call for Ideas are received.

3. Main report

- 3.1 The draft regional response to the NPF4 “Call for Ideas” is appended. The key message is the regional submission to Government is that the South East Scotland is the engine of Scotland’s economy. Unless it performs to its potential, Scotland will also lag. The key challenge for this region is that the benefits of success are not experienced by all individuals and communities, and nor are they shared across local authority areas which make up the partnership. Places like the Scottish Borders and parts of Fife do not share the same characteristics of success. Much more needs to be done to ensure that as many of the people across all places within the region can share in benefits in the future. These benefits must also be realised in the most sustainable way possible to respond to the climate challenge. A holistic approach is required, with some major, planned, integrated initiatives that will allow us to generate, and spread sustainable inclusive growth. Regional partners intend to work with, and risk-share with Government to make this happen.
- 3.2 The report then sets out:
- Challenges the Region Faces
 - Major Areas of Change
 - Regional Priorities for the Future
 - How Government can help work with regional partners to on a holistic basis to deliver place-based growth
 - Response to the Five Questions in the Call for Ideas
- 3.3 Following the submission for the “Call for Ideas”, a cross-regional Elected Member Oversight Group (EMOG) will be established as a subcommittee to this Joint Committee. Its purpose will be to oversee the longer-term progress of the RGF and RSS. Each local authority will appoint two members to sit on the Group. There will also be representation from the Higher/Further Education Sector and the Regional Enterprise Council. Each of the six councils are taking reports to their respective meetings to appoint their two respective members. The EMOG will aim to have their first meeting in April and will meet monthly to June when the RGF and Interim RSS will be finalised.

4. Financial impact

- 4.1 Regional partners have been working together, and with Government collaboratively to develop together Regional Growth Framework and Regional Spatial Strategy. Partners have dedicated staffing resources to take these pieces of work forward.

5. Alignment with Sustainable, Inclusive Growth Ambitions

- 5.1 This report summarises a response to the NPF4 “Call for Ideas”. It covers challenges that the region faces and major areas of change that are required for the region to deliver sustainable, inclusive growth. It also sets out how Government can work with partners to deliver its ambitions.
- 5.2 It is envisaged that the RGF, when complete, will help to deliver the following:
- Manage and distribute growth to maximise regional inclusive growth outcomes;
 - Deliver the 21,000 jobs outlined in the Deal, helping our most disadvantaged communities have the skills and ability to access these opportunities;

- Maximise community benefits from the Deal and align economic opportunities with areas of disadvantage areas;
- Make significant progress towards delivering 45,000 new homes; and
- Deliver fairer distribution of the benefits of growth and be more inclusive for all communities
- A just transition to a low carbon economy - The region is currently considering how best to deliver a just transition to a zero-carbon future. This can only be achieved through collective ambition, investment and resources

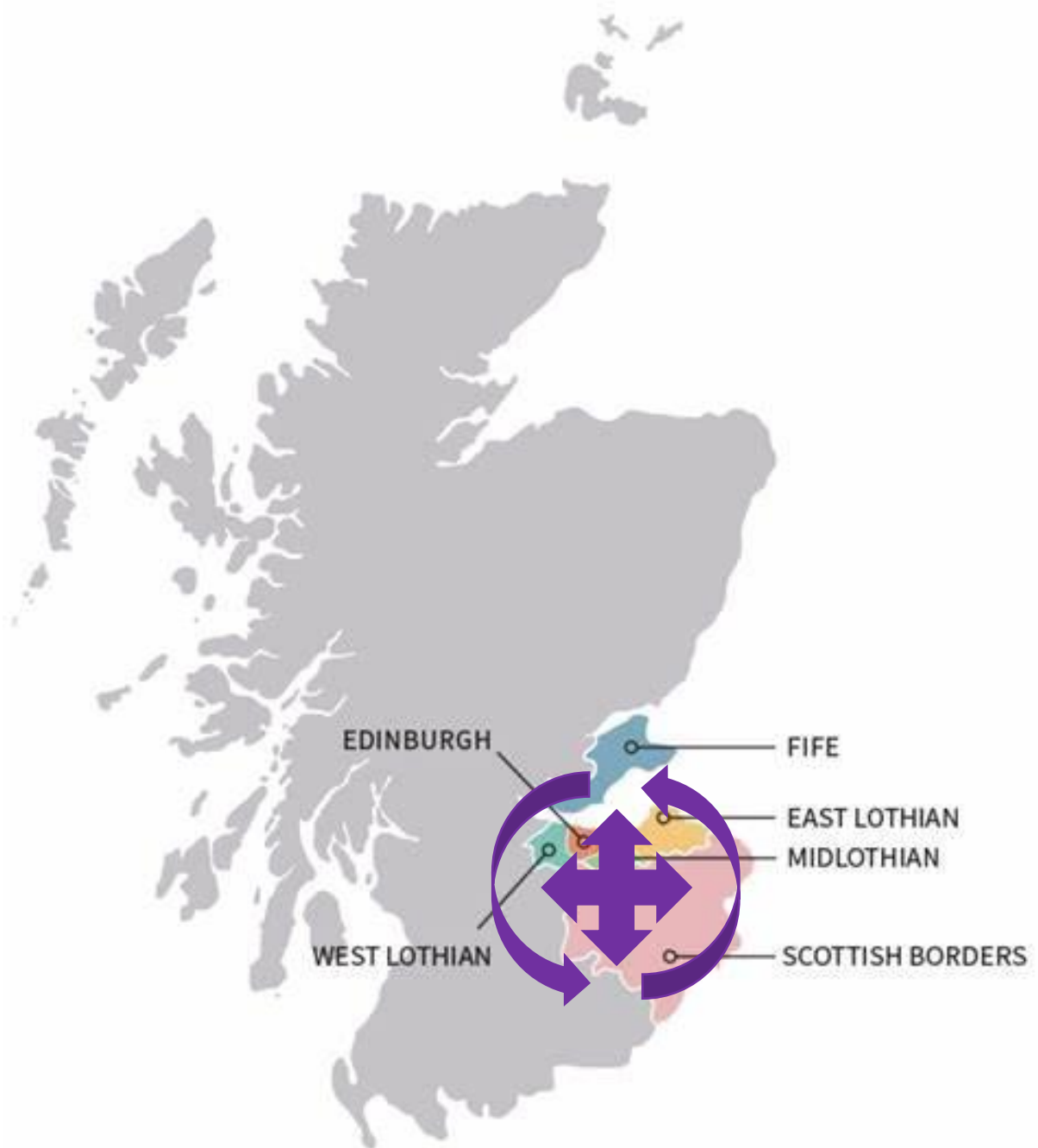
5. Background reading/external references

- 5.1 [City Region Deal Document](#): August 2018
- 5.2 [Edinburgh and South East Scotland City Region Deal Regional Growth Framework](#) – report to Joint Committee: September 2019

6. Appendices

- 6.1 National Planning Framework 4 “Call for Ideas” – Submission from Edinburgh and South East Scotland City Region Deal partnership.

Edinburgh and South East Scotland Regional Response to NPF4 Call for Ideas



Edinburgh and South East Scotland Regional Response to NPF4 Call for Ideas

Purpose

This document is the response of the Edinburgh and South East Scotland City Region (ESESCR) partners to the Scottish Government's 'Call for Ideas' on the emerging National Planning Framework 4. This submission is set within the context of the partners preparation of a regional growth framework which aims to ensure that the success of the region can continue to be realised and that the region continues to be the key driver of the Scottish economy

The regional growth framework will set out the region's strengths and opportunities. However, it must be recognised that the benefits of success are not experienced by all individuals and communities, and nor are they shared across local authority areas which make up the partnership. Places like the Scottish Borders and parts of Fife do not share the same characteristics of success. Much more needs to be done to ensure that as many of the people across all places within the region can share in benefits in the future. These benefits must also be realised in the most sustainable way possible.

The ESESCR Deal is of national importance with significant implications for Scotland's future growth of Scotland. The aspirations of City Region Deal partners can only be realised if the investment in infrastructure is focused on agreed priorities. This will need a co-ordinated approach by government and government agencies such as Transport Scotland. Several interdependent frameworks need to be aligned, including the National Planning Framework, the National Transport Strategy and the Strategic Transport Project Review in order to achieve this. The findings of the Infrastructure Commission should also be a key consideration and linkage.

The Role of the National Planning Framework

The *Call for Ideas* sets out that NPF4 will consider what Scotland should look like in 2050 and will guide where future development should take place. These are fundamental questions which cannot be answered by looking at the planning process in isolation. To deliver a vision for the future requires a joined-up approach on managing growth so that the right investment can be delivered in the right place at the right time. This will require a joined up multi-agency approach. The National Planning Framework will have a pivotal role in ensuring that the right amount of growth is identified and supported in the right place and that any infrastructure constraints and overheating in the market is addressed. The NPF will also have a role in ensuring that our valuable green spaces are protected.

In order for the South East of Scotland to continue to thrive it is essential that the NPF identifies outcomes which:

- Creates a policy framework which encourages sustainable economic growth.

- Recognises current barriers to nationally significant growth and provides solutions to overcome these barriers.
- Focuses support on those actions which bring the maximum social and economic benefits.
- Ensures linkages across all infrastructure providers to deliver agreed priorities.
- Ensures the linkage between support for growth and the infrastructure necessary to support that growth.
- Provides a framework for growth to be supported in the most sustainable way possible.

This response sets out the view of the City Region Deal partners. It takes a strategic approach and sets out the interventions which will be necessary if the ambitions and aspirations of the City Regional Deal partners are to be met. Appendix 1 sets out the regions response to the five questions set out in the NPF4 Call for Ideas documents. It does not address matters of detail as it is likely that individual partners will wish to respond to the *Call for Ideas* setting out specific matters of relevance to each partner.

Context

Much of Scotland's future economic, population and household growth will take place in this region. Economically, this region is the strongest and best performing in Scotland and one of the best in the UK. It is the best performing in education and productivity measures; has the highest employment growth rate for men and women and the highest growth in business start-ups and mid-sized companies of any Scottish region. It provides a quarter of all of Scotland's business premises with the highest national annual growth rate over the last decade. It also provides for more than a quarter of all Scotland's employment.

However, this success is not experienced by everyone, and there are significant and persistent pockets of deprivation in the region. A successful future depends on a more inclusive distribution of the benefits of the growth, so that I can reach those communities most in need.

The Edinburgh and South East Scotland City Region Deal aims to accelerate growth. This will create new economic opportunities and meaningful new jobs that will help to reduce inequalities. The Deal, its programmes and projects are of national significance and will invest £1.3 billion and deliver 21,000 jobs. It has the potential to deliver over 45,000 homes across seven strategic sites. However, the City Region Deal projects alone cannot address longstanding, deep-rooted issues facing the region and more action and intervention is required to accommodate growth and enable it to transition to a low carbon economy. Key challenges include:

- A just transition to a low carbon economy - The region is currently considering how best to deliver a just transition to a zero-carbon future. This can only be achieved through collective ambition, investment and resources.
- The success and prosperity in the region is not experienced by all. Both the Scottish Borders and Fife sit across more than one region with Tayside in Fife experiencing medium growth and the Scottish Borders experiencing low growth.
- Too many people are unable to move on from low wage and low skill jobs.
- There are pockets of multiple deprivation. Nearly a fifth of our children living in poverty
- Housing need and demand is outstripping supply, especially affordable housing. Increasing the supply and accelerating the delivery of homes across all tenures is critical to accommodate growth and ensure that the region remains an attractive place to live, work and invest.

- Within the regional core, the commercial and residential markets are overheating. Whilst there is brownfield land that can be redeveloped here, the developable opportunities are limited.
- Lack of connectivity and affordable public transport options both within and across boundaries particularly in many of our rural areas leaving communities disconnected from places of work and opportunity.
- In Edinburgh, 45% of the workforce commutes to work by car with significant traffic congestion experienced on all major routes into the city impacting productivity, air quality and the environment.
- Physical and social infrastructure provision is critical to the delivery of the City Region Deal seven strategic sites and many other strategic development areas across the region. Overcoming funding and delivery solutions is key to unlocking the transformational potential these sites can have for housing supply, jobs and the economy.

The remaining part of this document outlines major areas of change and opportunity, and future priorities for the region as well as a call for collective action to deliver place-based growth.

Major Opportunities

A Better-Connected South-East Scotland

The interdependence between local partners has never been greater with increased mobility of workers and people choosing to live, work and invest in locations across the region irrespective of local authority boundaries. South East Scotland is well placed to capitalise on improved international, UK cross-border as well as national connectivity, including between Edinburgh and London. Edinburgh Airport, ports on the Firth of Forth and the radial transport corridors to, through and from our region connect it to other UK, Scottish regions and City Region Deals including TayCities and Borderlands. These routes and our digital connectivity provide the means to develop wider relationships and to seek out, attract and share new opportunities.

Edinburgh city centre and the regional core have an unrivalled role, but many of our major cross boundary connections converge elsewhere in the region. A better more sustainably connected region underpins its future success. Some of our key objectives are to promote future growth within the city centre, regional core and along our growth corridors in line with the high-level approach below:

- **Connecting West** – we want to build a new partnership between the Edinburgh and Glasgow City Regions to address labour market linkages, sustainable connectivity and sectoral collaboration. We also want to ensure we take advantage of our shared UK cross border connectivity and associated development opportunities, including logistics, freight and storage and distribution as well as manufacturing;
- **Connecting North** – utilising recent investment in the new Forth crossing, we want to improve connections to the Tay Cities Region and Aberdeen City Region areas, and to make available growth opportunities in key locations within Fife, including the former Longannet Power Station site, Port of Rosyth and Fife Energy Park, as well as around the Forth Bridge heads and at Edinburgh Airport, including growth of our financial, insurance and other professional sectors;
- **Connecting East** – utilising existing and future enhancement of UK cross border connections between south east Scotland, north east England and London we want to reduce journey times and strengthen the UK cross border cities network. Along this corridor there is significant

potential to align plans for substantial economic and housing growth in a new regional growth location focused on an enlarged new settlement with new regional town centre, the redevelopment of former Cockenzie Power Station site and a new regional gateway transport hub;

- **Connecting South** – the BioQuarter, Easter Bush and Edinburgh Innovation Park at Musselburgh all cluster around the A720, A1 and East Coast Main Rail Line, Tram Line to Midlothian as well as Borders Rail, which also creates opportunities for sustainable growth and rural regeneration. A potential extension of this line to Carlisle also offers scope to improve UK cross border connectivity between the south of Scotland and the north west of England.

In the future we will continue to use these established corridors to enable a sustainable pattern of development and on-going inclusive growth.

Delivering Major Areas of Change

The emerging RGF has identified key areas of change which builds on the regions existing strengths and assets but also looks to a zero-carbon future and specific areas which will require collective action. These areas include:

- **Economic growth in the urban core** – ensuring Edinburgh city centre has a public realm befitting Scotland’s capital, and a supply of sites and premises to support economic growth at all scales, particularly for SMEs to scale up.
- **Centre for Data Driven Innovation** – Data Capital of Europe – with a world leading DDI cluster around the University of Edinburgh’s main campus in the city centre including assets funded by the City Region Deal - Bayes Centre and Edinburgh Futures Institute.
- **Tourism dispersal and management** – developing clear plans to ensure the visitor economy of the city region works as a single ecosystem, dispersing visitors from hot spots across the region, and into the rest of the country.
- **Town Centres** – town centres across the region have experienced huge changes driven by shifts in the way society lives, works and shops. Town Centres are vital to efforts to reduce carbon and deliver sustainable places, and all our region’s town centres must work to find a new economic purpose.
- **Office market dispersal and management** - opportunity to spread the benefits regionally and from an overheating city centre with limited supply or opportunities for new office space and high levels of productivity consequent on economic focus on finance and insurance and other such sectors, set against surrounding areas that are not as productive consequent on business base and commuting travel patterns.
- **Edinburgh, East Lothian and Midlothian Innovation zone** – Edinburgh BioQuarter, Usher Institute, Edinburgh Innovation Park (Food & Drink), Shawfair and Easterbush; world class innovation and business potential, but also housing growth.
- **Sustainable growth in West Edinburgh and West Lothian** - the airport, development sites, residential growth and sustainable infrastructure, focused on public and active travel improvements.
- **Industrial regeneration in Fife and the Scottish Borders** – City Deal funding is being used to deliver programmes of investment that are strongly focused on innovation and that link to the DDI Programme. The locations chosen for investment are linked to existing growth corridors by road and by rail and help to maximise the impact of investment in the Borders Railway and plans for the Levenmouth Rail Link, as well as the existing Fife Circle rail line.
- **Coastal regeneration in Edinburgh** – Leith to Granton, public sector owned waterfront sites to create mixed used development of the highest quality. Deliver a single programme, to ensure

the right infrastructure is in place, and to work closely with key private sector partners such as Forth Ports.

- **Blindwells New Settlement, former Cockenzie Power Station site and Climate Change Zone** – a major opportunity of national significance for future collective impact and co-ordinated action to deliver a new regional transport hub as well as green, blue, grey and low and zero carbon infrastructure to turn challenges in to opportunities, enable regeneration and the creation of a new regional destination and attractor.
- **The Forth Bridges** – building on the Forth Bridges partnership to drive growth across the World Heritage site.
- **The Forth - A regional climate change response** – the Forth unites the region and requires the region to act collectively to develop measures to mitigate the consequences of climate change on our collective coastline e.g. coastal erosion, rising sea levels, recreational uses and development potential and to protect, conserve and enhance the natural heritage assets there.
- **Longannet** – the site of the former Longannet Power Station is recognised as being of strategic national importance and benefits from critical infrastructure advantages, particularly relating to energy. A transport focus, particularly around rail with upgrading of the existing line and new stations at Longannet, and potentially Kincardine for passenger services, will support the economic future of this key location. This also offers the opportunity to strengthen linkages between the Edinburgh and South East Scotland and other regions to the West, including Falkirk, Clackmannanshire and Stirling.
- **North East Fife** – Guardbridge and Cupar are the key areas of development focus in North East Fife. The University of St Andrews' Eden Campus is the focus of significant investment by the University and the public sector. It will provide space where companies can access University and industrial expertise, engage with other companies, build business-to-business collaborations, and develop and experimentally test innovative new approaches to the development of low-carbon energy systems. Additional employment land will be provided in Cupar. A new regional transport model has now been developed and can be used to test new investment ideas including additional rail halts and the opportunities associated with track improvements at stretches in North East Fife that remain single line.
- **City Region Deal seven strategic sites** - Blindwells; Calderwood; Dunfermline; Edinburgh's Waterfront; Shawfair; Tweedbank; and Winchburgh. Collectively these can deliver over 45,000 new homes, create 9,500 jobs and contribute over £12.6 billion to the wider economy. The sites are all at various stages of development and delivery, each with their own unique set of infrastructure and delivery challenges.

Future Regional Priorities and Opportunities

A series of future regional priorities have been outlined below. These are emerging priorities and will require further work, consideration and consultation as the RGF develops. These priorities fall broadly into three key thematic areas - **Flourishing, Smart and Resilient**.

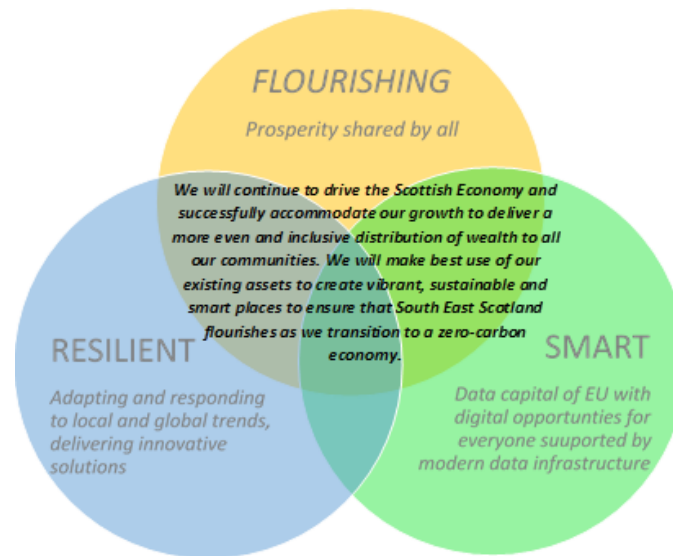


Figure 1 – Emerging RGF themes

Theme 1 - Flourishing

Spreading the benefits and prosperity more evenly around the region in the future will ensure that inclusive growth is achieved. Technological and climate change is transforming the types of skills requirements and job opportunities available and how companies do business. It is vital that people in the region have the skillsets required to work in key sectors. Future opportunities include:

- **Delivering the 21,000 jobs** that the City Region Deal projects will bring, and helping our most disadvantaged communities have the skills and ability to access these opportunities.
- **The City Region Deal Integrated Regional Employability and Skills (IRES) Programme** will provide part of the support required to help people in the region adapt to these changes.
- **Maximising community benefits** from the City Region Deal and future collaboration projects can deliver economic opportunities linked to areas of disadvantage.
- **Distribution of key sectors and jobs and assets** - building on the region's core sectoral strengths which include tourism, life sciences, data science, tech, finance, fintech, creative industries, food & drink, manufacturing, warehouse and distribution.
- Supporting our **town centres** and existing key sectors including retail, health care, hospitality and more.
- **Growing export value** and the number of exporters. Consider economic opportunities at a regional scale e.g. future warehouse, distribution, industrial and retail uses, and how those organisations maximise their global reach.

Theme 2 - Smart

The region has the ambition of becoming the Data Capital of Europe, ensuring that communities across the region benefit from data driven innovation.

Data is critical to future economic growth, social change, and public services, the region has ambitious plans to establish the City Region as the Data Capital of Europe. The City Region is home to the £1bn+ businesses FanDuel and Skyscanner, and major international tech companies such as Amazon, Cisco, Oracle, Microsoft and IBM have also created bases in the City Region. In terms of academic and research capability, the University of Edinburgh has been ranked first in the UK for

computer science and informatics research and Heriot-Watt University is a global leader in Robotics and Artificial Intelligence (RAI). Future opportunities include:

- **Collaboration across public, academic and health sectors** to apply data science, to develop innovative and financially sustainable models of health and social care that improve lives.
- **Data-driven approaches** to prevention, treatment, and health and care service provision, enabling high quality and efficient care within a world-leading learning healthcare system.
- **Delivering business premises** of the future are ready for data-drive innovation opportunities, including the City Region Deal Fife i3 Programme and Central Borders Innovation Park.
- **Smart and future proofed infrastructure** – ensuring the region is at the forefront of new infrastructure and in a position to deliver 5G and superfast broadband across the region that can enable businesses to locate, invest and grow in our more remote and rural locations whilst also allowing people to work from home and more flexibly.

Theme 3 - Resilient

To respond to change the region must be able to adapt. Economic changes, including technological advances are rapidly taking place. Climate change is bringing challenges and opportunities for the region, including the need for adaptation, mitigation and sequestration measures; this could also bring significant opportunities to justly transition to a low carbon economy. Our people also need to adapt in terms of lifestyle, and we must change our skills base to meet the requirements of our future economy.

- **Better connected** - Future priorities to ensure that the region is better connected, include:
 - Measures to increase workforce mobility, especially for residents of disadvantaged communities, primarily through the integration of land use and transport, utilising contra-peak capacity in the transport network and providing reliable, frequent and affordable high-quality public transport.
 - Identifying priority routes for active travel to and from the new strategic housing sites, as well as from main centres of population to centres of employment, education and training as well as other public facilities including health care.
 - Focus on the routes where investment in bus priority measures will have the greatest impact on modal shift and supporting the more disadvantaged communities.
 - Interventions that, individually and/or collectively, demonstrably address climate change and reduce carbon emissions.
 - Considering potential longer-term schemes for tram, light rail and heavy rail.
- **Adaptable and sustainable** - Priorities to ensure that the region can adapt to climate change and transition to zero carbon emissions include:
 - **Sustainable Modern Methods of Construction** – The scale and pipeline of regional housing development presents a unique opportunity for innovation and use of offsite manufacturing methods of construction to ensure that homes are future proofed being built to the highest quality and energy efficiency standards with significantly reduced waste and carbon emissions. Continued collaboration with Edinburgh Napier University’s Institute for Sustainable Construction and Construction Scotland Innovation Centre.
 - **Energy** - The region already has some significant assets that can help enable the transition to a low carbon economy. However, harnessing this collective potential

combined with future investment, behavioural change, and recycling will be essential to meet ambitious local and national targets. Existing key assets and opportunities across the region include:

- **Energy Park Fife** - Energy Park Fife is a world leading engineering and research zone within the energy sector.
 - **Energy from Waste Plants** - *Maximising connections to* Midlothian and East Lothian sites to deliver low carbon heating in the South East of Scotland.
 - **Geothermal** - There are several former coal fields across south east Scotland, such as the Midlothian and East Lothian and Fife coal fields, where there is significant potential to abstract and make use of warm mine water to develop geothermal heat networks.
 - **Recycling** - Significant expansion in recycling facilities, consideration could be given to regional recycling hubs.
- **Carbon Capture & Sequestration** - Regional actions to absorb additional carbon that we are not able to deal with through reduction measures. Afforestation and enhancing the significant woodland and wetland assets within the region and particularly the Scottish Borders.

A more detailed Regional Growth Framework can consider sustainability impacts and interventions required to facilitate a just transition to net zero carbon, while enabling inclusive and sustainable growth in our communities.

Collaboration – taking a holistic approach to deliver placed based sustainable growth

Key partners in the delivery of the Regional Growth Framework will be the Edinburgh City Region Deal signatories (the six local authorities, together with regional universities, colleges and the Regional Enterprise Council (includes third, public and private sector representation), UK and Scottish Governments.

The region seeks to deliver a holistic approach with major, planned, integrated initiatives that will allow us to generate, and spread sustainable inclusive growth. Regional partners will work with, and risk-share with Government to make this happen.

To help the region achieve our ambitions we ask for Government support on the following measures:

- Acknowledge the ambitions and priorities of this region as detailed in a future version of the Regional Growth Framework and future SE Interim Regional Spatial Strategy to enable the region to actively engage, collaborate and inform the Scottish Government work on NPF4, STPR2, Climate Change and ensure that the region’s economic, planning, infrastructure, transport and housing priorities are properly articulated so they can be reflected nationally.
- Build on the successful partnership and governance arrangements achieved through the £1.3bn City Region Deal to expand on this success to deliver a truly integrated approach across policy areas.
- Resource and invest in the prospectus and propositions that will follow on from this document in the form of a detailed RGF alongside key national agencies including Scottish Enterprise, Skills Development Scotland, Visit Scotland, Transport Scotland and Scottish Futures Trust.

- Work collaboratively with local, regional and national partners, including academic partners, to consider and develop sustainability and climate change impacts and interventions required to deliver sustainable and inclusive economic growth.
- Consider how future investment funds including post European Structural Funds can support the regions growth and low carbon ambitions.

Play a lead role in linking regions and Deals together to identify complimentary projects and to explore new opportunities, maximise limited investment and efficiencies and reduce duplication. This can enable the region to look West along the M8 to the central belt and Glasgow; North to the TayCities Deal and beyond; East to Newcastle and Northumbria and the south east of England, and South to the Borderlands Deal and across the border.

Appendix 1 – Edinburgh and South East Scotland City Region Deal response to *The Five Questions in the Call for Ideas*

The *Call for Ideas* for inclusion in NPF4 sets five questions under a banner question of “What do you want planning to do for your place?”

City Region Deal Partners do not see NPF4 as a ‘planning’ document. Delivering and sustaining economic growth requires a partnership approach across all stakeholders. Therefore, first and foremost, NPF4 should set a strategic and binding framework for delivering sustainable growth. To do so will require understanding barriers to growth and the solutions to them. The City Region Deal partners’ views on how sustainable economic growth can be most effectively overcome, and their ask of the Scottish Government through the NPF4 are set out in the responses to the five questions as follows.

Question 1: What development will be needed to address climate change?

Planning authorities and regional partnerships have been invited to prepare interim regional spatial strategies to inform the content of National Planning Framework. The City Regional Deal partners intend making submissions on this but the work to inform those submissions is not yet complete.

However, the spatial strategy is likely to build upon the strategy set out in the second Strategic Development Plan for Edinburgh and the South East of Scotland (SDP2) with an addition to incorporate the strategy for North East Fife to reflect the geographical extent of the City Region Deal and the agreed extent of the geography for the Interim Regional Spatial Strategy. Additionally, it will outline a series of measures to respond to both the challenges and opportunities presented by climate change.

Although SDP2 was rejected by the Minister this was a result of the Minister not being satisfied that the transportation impacts of the strategy had been properly assessed. There was no indication that the spatial strategy of that document was not acceptable to the Minister and given that the strategy was agreed by all SESplan partners it is appropriate that this forms the basis of the Interim Spatial Strategy.

If the South East of Scotland is to continue to be the engine room of national economic growth in Scotland, the levels of growth set out in SDP2, and the associated spatial strategy, will have to be supported. It should be the role of NPF4 to ensure co-ordination of investment to allow the levels of growth to be achieved. Sustainable growth should not be put at risk as a result of un-coordinated infrastructure responses.

The SDP2 action programme identified the necessary infrastructure to support growth and the strategic elements should feature in NPF4 as a base line. However, a further review should be undertaken in the context of the Infrastructure Commission’s report to see if the interventions set out can be achieved in a way which ensures economic growth while minimising the need to travel by unsustainable means and minimising the impact of existing capacity.

Question 2: How can planning best support our quality of life, health and wellbeing in the future?

Although the South East of Scotland is characterised by economic success this continues to mask significant disparity and disadvantage in the region.

- The success and prosperity in the region is not experienced by all both the Scottish Borders and Fife sit across more than one region with Tayside (Fife) experiencing medium growth and the South (Scottish Borders) experiencing low growth when considering comparable economic performance.
- Too many people unable to move on from low wage and low skill jobs.
- There are pockets of multiple deprivation with nearly a fifth of our children living in poverty.
- Housing need and demand is outstripping supply, especially affordable housing.
- Lack of connectivity and affordable public transport options both within and across boundaries particularly in many of our rural areas leaving communities disconnected from places of work and opportunity.
- A just transition to a low carbon economy - the region is currently considering how best to deliver a just transition to a zero-carbon future. This can only be achieved through collective ambition, investment and resources.

Ensuring sustainable economic growth which increases opportunity for everyone in the South East of Scotland, while protecting our most important environmental assets is key to ensuring quality of life, health and wellbeing.

This will require positive intervention to ensure that those who are furthest from the market, both physically and educationally are able to access employment and training opportunities.

To support this the National Planning Framework should:

- Recognise that a diverse economy will require a range of house types and tenures in the region.
- Establish tenure specific housing targets for the region which are supported by an evidence base of demand for each housing tenure.
- Establish land use strategies which encourage the use of brownfield land before development on greenfield sites.
- Establish land use strategies which are supported by a transport strategy which does not focus solely on maximising capacity and speed for city to city journeys, but which ensures equality of access to regional hubs for all communities and areas of growth.

Question 3: What does planning need to do to enable development and investment in our economy so that it benefits everyone?

While the economy in the South East of Scotland remains the most significant contributor nationally, there continues to be risks to the economic success of the area. To respond to change the region must be able to adapt. This requires a policy framework which provides certainty to businesses and communities but is flexible enough to respond to economic change which could occur rapidly and potentially without warning. The policy framework must recognise the changes which will result from technology and the changes which will be necessary to respond to climate change.

To support this the National Planning Framework should:

- Ensure that there is a strategy for sustainable growth which benefits all parts of the South East of Scotland while protecting important environmental assets.
- Take positive action to avoid the creation of dormitory towns except in circumstances where they are focused on the most sustainable transport options.
- Support measures to increase workforce mobility in the South East of Scotland, especially for residents of disadvantaged communities, primarily through affordable public transport.

- Establish a requirement for developers to deliver priority routes for active travel to and from the new strategic housing sites, as well as from main centres of population to centres of employment, education and training.
- Focus on the routes where investment in bus priority measures will have the greatest impact on modal shift and supporting the more disadvantaged communities.
- Interventions that, individually and/or collectively, demonstrably address climate change and reduce carbon emissions.
- Considering potential longer-term schemes for tram, light rail and heavy rail.
- Provide a framework for the transition to sustainable methods of construction.
- Set a framework for accredited carbon offsetting which will support the transition to a net carbon zero city region.
- Consider the Major Areas of Change highlighted in the main body of this response as potential National developments

Question 4: What policies are needed to improve, protect and strengthen the special character of our place?

The Edinburgh city region is internationally recognised as both a leisure destination and a place to do business. However, that success risks the very basis of that success. It is recognised that Edinburgh is in danger of overheating as both a leisure destination and a place to do business while at the same time significant capacity for growth exists elsewhere in the city region.

The authorities have a role in promoting the advantage of the area outwith the city centre, but more co-ordinated action is required to ensure that these locations become destinations of choice. This will include

To support this the National Planning Framework should:

- Establish a policy framework which protects the region's most important environmental assets from development.
- Support the development of green networks across the region which provide, opportunities to increase access to the countryside, biodiversity and carbon reduction.
- Recognise the significant economic benefit which is derived from tourism to the region and ensure that the infrastructure necessary to support tourism is prioritised.

5: What infrastructure do we need to build to realise our long-term aspirations?

Supporting sustainable economic growth will require a range of infrastructure interventions. That will inevitably require both new infrastructure and investment in current infrastructure to ensure that capacity is being maximised. Historically, the public sector has been adept at identifying the necessary infrastructure – for example through development plan action programmes – but has been less successful in ensuring delivery of the infrastructure because, in most cases, delivery is out with the control of local authorities.

City Regional Deal partners recognise the role of the Infrastructure Commission in securing co-ordination of infrastructure investment and delivery and the work of the commission should be incorporated within the NPF. But the work of the commission also needs to be recognised in the National Transport Strategy and other national strategies. There should be one infrastructure plan for the country which prioritises requirements and identifies funding solutions. The NPF should set growth targets based on the delivery of infrastructure improvements and not the other way around.

In establishing that framework a fundamental rethink is required. In order to ensure sustainable economic growth existing road and rail infrastructure capacity should be maximised. Together with reducing the need to travel, there should be a focus on modal change of freight from road to rail and or sea.

Although rail infrastructure is under pressure during the day time, significant capacity exists at night. Moving greater volumes of freight from road to rail would free up capacity on the road infrastructure to support sustainable travel while reducing the need for further investment in road infrastructure. This should be done in parallel with investment in public transport infrastructure to make community by bus a realistic option, particularly for those journeys not focused on regional hubs.

To support this the National Planning Framework should:

- Establish an Action Programme for infrastructure requirements in each region.
- Ensure that the Action Programme prioritises the delivery of infrastructure having regard to economic impact of providing that infrastructure and the level of growth it would support.
- Establish a funding mechanism or mechanisms to ensure delivery of the necessary infrastructure.
- Support measure to ensure that developers build homes which are sustainable and can support homeworking and the use of low carbon technologies including the provision of electric vehicle charging points.

APPENDIX 2 - NATIONAL PLANNING FRAMEWORK 4 – CALL FOR IDEAS

Draft Council Response

General

The Council is in the course of reviewing its planning policies as part of its main issues report, Choices for City Plan 2030, which is being consulted on. Therefore, the Council has not yet reached a 'settled view' of what those policies should be. However, the Council has approved commitments to build a minimum of 20,000 affordable homes by 2027 (August 2017), to be carbon neutral by 2030 (May 2019) and has an economy strategy for inclusive good growth (June 2018). In a planning environment shaped by new legislation and by increasingly urgent national and local commitments on step change in addressing climate change, housing need and health and wellbeing, there is a clear policy direction which Choices seek to address. The final content of these policies will be shaped by consultation responses to Choices and the Scottish Governments' consultation on the draft National Planning Framework 4 but the context of them and the objectives which need to be addressed are clear. Alongside this the Council is consulting on a draft City Mobility Plan as a Local Transport strategy which sets out the potential for active travel and public transport interventions which would support the national objectives of decarbonisation of transport and support for inclusive growth, and which underpin how Choices seeks to accommodate and support growth in the city.

The Council supports the submission on behalf of its regional partners, Edinburgh and South East Scotland Regional Response to National Planning Framework 4 "Call for Ideas" and the continued work to prepare an Indicative Regional Spatial Strategy and a Regional Growth Framework. These will aim to ensure that South East Scotland continues to be the key driver of the national economy, build on the region's existing strengths and assets and identify impacts and interventions required to transition to carbon neutrality, whilst enabling inclusive and sustainable growth in our communities. Other matters need to be addressed and the Council therefore sets out its submission for NPF4 below in response to the Call for Ideas, with a focus on the following key areas:

1. What development will we need to address climate change?

We will need to focus on development which enables carbon neutral targets to be reached. To do this we need to ensure we build higher densities and mixed use, high amenity neighbourhoods rather than standard volume housebuilding models, in locations where good public transport and active travel connections can be made and used to ensure need to travel and travel distances are minimised.

The coordination of higher density, mixed use approaches to addressing housing need and demand along with transformation of travel options aligns with Government agendas on carbon neutrality, place making, transport hierarchy and health and wellbeing.

Sustainable public transport development in heavy rail including Waverley and Haymarket Stations capacity, the 'Chord' proposed link with Kirkliston with a potential station, 4 tracking of the East Coast Main Line and High Speed Rail would facilitate sustainability and capacity in regional settlements and beyond. Additionally, rail investment would allow for greater connectivity in and beyond the city region.

Mass rapid transit by tram or guided bus through north/south Edinburgh with cross boundary regional links to east, south and west would offer sustainable links to reduce car commuting.

A wider review of transport options and how these could contribute to the nationally significant contribution of Edinburgh to inclusive growth, carbon reduction and sustainability should be considered on the basis of the list at the end of this report.

Use of blue and green infrastructure as connecting links, natural flooding management measures including watercourse catchment tree planting as well as on site bioSuDS as attenuation measures is key to addressing flood risk.

Green infrastructure needs to be a policy objective in terms of design as well as overall green network.

We must also consider looking at strengthening protections for arable land, particularly prime quality agricultural land unless strategic sustainable growth requires its use.

2 How can planning best support our quality of life, health and wellbeing in the future?

The Council recognises the issues of availability and affordability of housing. We need to consider and address the latest available evidence on need and demand for housing to ensure that the basis of a development plan is an ambitious but deliverable housing target that does as much as possible to address issues of housing availability and affordability for all sectors of the market, bearing in mind that we also need to design and build for sustainable development, which may need realignment of current models of housebuilding and housing delivery alongside sustainable transport interventions.

Housing targets

The Council notes that National Planning Framework (NPF) 4 is intended to include housing targets, though the legislation does not define whether this is to be at a national, regional or local level and does not consider what methodology might be used to define those targets. The Council's Choices for City Plan 2030 takes the latest available evidence from Housing Need and Demand Assessment 2 for the South East Scotland city region area and, taking account of SESplan 1 as the approved Strategic Development Plan, sets out housing targets, also informing these with the Council's own commitment to provide 20,000 new affordable homes between 2017 and 2027 in continuing support of the Scottish Government's commitment to increase the supply of affordable housing, moving on from their target to provide 50,000 affordable homes in Scotland by 2021. These are evidence based housing targets, taking into account enhanced delivery of affordable housing and build to rent housing, which generally can deliver more consistently and faster than market response to the mortgage market. Setting either market or affordable housing targets at higher levels than those proposed by the Council is not seen as deliverable and, unless policy on housing land supply is changed and clarified for consistency as set out elsewhere in this submission, it would be counterproductive to set targets at any higher level. If the Scottish Government itself, or through consultation on NPF4 takes

a view that housing targets should be lower than as the Council proposes then the Council will consider the implications of this.

Housing land supply

In respect of the development plan giving certainty to communities and by that supporting quality of life, health and well-being, the consideration of housing and land supply through the life of the development plan is critical.

The report of the [Independent Review of the Planning System](#) in 2016 highlighted the impact of the confusion around measurement and definition of 'effective' housing land and Recommendation 13 stated an urgent need to establish a clearer definition, to allow energies to be focused on other, more important things. Whilst this may seem a technical argument, it has a profound influence on the level of certainty that a development plan can provide for communities, as the Council is required to set targets that are then to be fulfilled in a large part by the market and where this does not happen the market providers can argue for more land.

This issue remains a key piece of unfinished business from the independent review and NPF4 is an opportunity to set out a clearer policy context for how housing land and housing delivery are measured and dealt with. Detailed national advice or circulars can be updated following NPF4.

Since 2016 CEC has worked with Homes for Scotland and Heads of Planning Scotland (HOPS) to develop a new, clearer approach. which addresses most of the problems and impacts identified by the Independent Review by the simple step of measuring the supply of effective housing land and the rate of housing delivery as separate things.

HOPS members have drafted a paper setting out proposals for a new, common approach using the principles of separate measurement. NPF4 and subsequent advice note reviews could use this to establish a common and agreed approach. The [background papers](#) provided by the Government indicate thinking along similar lines.

It is recommended that NPF 4:

- States that the supply and availability of housing land (established and effective) should be measured separately from housing delivery/completion rates.
- State what should happen in situations where the supply of effective housing land will be used up before a specified number of years (e.g. 5, or 10).
- State what should happen in situations where the programme of housing completions over the forthcoming period is insufficient to meet the relevant targets.

Current Scottish Planning Policy (SPP) does not address the second and third points separately, because it is based on the current assumption that the programme of future completions is one and the same thing as the supply of effective housing land.

Affordable housing

The Council also believes that the level of need and demand for affordable housing as quantified by HNDA2 provides strong evidence for increased levels of affordable housing in the region and the city and that revision to SPP should take account of this and evidence for other areas. The Council respects the evidence that affordable need

and demand is higher than the 35% it is proposing in Choices, however, some assessment of viability in the area suggests that 35% is an appropriate level, though evidence from consultation will be used in assessing the level set in the Proposed Plan. The Council therefore suggests that to assist higher levels of affordable housing delivery in line with Government commitments, national policy should support affordable housing requirements of market development which are evidenced by both need and viability assessments, unless other funding and delivery mechanisms to provide full affordable need can be identified.

South East Scotland partners have developed an ambitious [regional housing programme](#), which aims to increase the supply of homes across all tenures, to deliver vibrant and sustainable communities across the region. Taking a place-based approach across infrastructure, land, finance, innovation and skills, it seeks to accelerate the delivery of affordable housing, seven regional strategic sites and incorporate innovation in construction. NPF4 should support this scale of development as a significant contributor to national housing supply, incentivising and supporting offsite manufacturing and supporting collaborative procurement across local authorities to maximise economies of scale to support the pipeline of sites to deliver affordable housing programmes.

Brownfield development

The Council proposes to develop, where possible and deliverable, mixed use developments on brownfield land, but recognises that the evidence on this from consultation needs to be considered. The Council suggests that in addressing climate change, placemaking and connectivity and cohesion across existing and new communities, consultation on national policy should reflect that there is a need to review and strengthen the level of presumption in favour of brownfield development and the minimum levels of density appropriate to urban and edge of urban sites, to promote better public transport efficiency and more sustainable neighbourhoods where the density supports a level of local services and employment opportunities. These together would reduce need to travel, travel distances and promote modal shift to support sustainable public transport as well as active travel.

Managing short term lets

In combination with seeking to provide a generous housing land supply for market and affordable housing the Council is proposing policies on managing the impact of short term lets and student housing on land markets and the availability of the existing housing stock. Whilst Edinburgh has seen a significant surge in homes being taken out of the residential market, this also applies to other rural areas and there is a need for national planning policy to support the ability of planning authorities to address this. Choices proposes reflecting the Government's recent commitments on short terms lets and the provisions of the Planning (Scotland) Act 2019,

Student housing

It may not be considered relevant to set a national policy in respect of student housing, however, this has become a significant land use with impacts on the land

market and on communities. Appropriately sited, designed and managed student accommodation can be an asset to local economies and communities. The Council proposes that student accommodation on sites over 0.25 of a hectare should provide general needs as well as student accommodation and, within the general needs housing, affordable housing at the appropriate ratio, and have an appropriate level of amenity space. The Council also proposes a maximum of 10% of student housing be studios, so that developments are largely composed of cluster flats, with benefits to student well being and, should student numbers reduce, are more adaptable to general needs housing

Design for people and place rather than engineered environments, providing for active travel and public transport to enhance ease of travel, reduce vehicle dominance, and promote healthy travel and active, green routes that promote safety and well being.

3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

National agendas for inclusive growth are supported and NPF4 has a role to play in supporting the planning system's ability to provide for this through significant economic growth, availability and affordability of homes and step change in a better connected, carbon neutral transport system.

NPF4 needs to continue and emphasise the town centre first principle whilst allowing for new local centres to support mixed use development and create localised economies as part of growing communities.

National policy needs to look at how we balance a range of uses with how those connect up to existing and new communities.

To provide for inclusive growth, we must work to develop sustainable accessible transport for access to learning and jobs.

4. What policies are needed to improve, protect and strengthen the special character of our places?

Given the range of place characters in the country, national policies need to allow for flexibility but also need to recognise how planning can address climate change along with housing and economic growth needs.

Density and mixed use

Choices propose that new development be at higher density than volume housebuilders tend towards with both brownfield and any potentially required greenfield sites proposed as having a minimum 65 homes per hectare density with provision for a minimum of 100 per hectare to be specified in some areas rather than 25-35 of volume housebuilding.

Those proposed densities may not suit many smaller settlements throughout the country, so national policy needs to consider appropriate densities for settlement types and scales, to support higher density in appropriate locations to promote place making, public and active travel use and climate change adaptation.

Density alone is not the answer for urban areas and requirements for mixed use, local neighbourhoods with commercial and community facilities need to have a more significant emphasis in national policy and be interspersed with green spaces and wild land.

Further emphasis on and requirement for green networks and active travel links to support decarbonised public transport is also essential to ensuring the effective connection of new neighbourhoods with adjoining communities as well as work opportunities and other commercial and public services.

Design policies for climate change resilience need to support change in existing areas, including how this can be achieved for conservation areas and listed buildings, as well as set a clear framework for new area and building design. This includes the consideration of a carbon neutral standard for new buildings and redevelopments.

5. What infrastructure do we need to build to realise our long term aspirations?

Infrastructure provision and funding is critical to how growth can be served sustainably and effectively. The provisions for Section 75 based developer obligations are complex and subject to high levels of challenge and legal scrutiny. All sectors of the development process recognise a critical need to resolve this and work towards a system which has a simpler, longer term, more equitable approach and allows Councils to adequately plan infrastructure and its funding for the long term without exposure to significant financial risk.

Sustainable transport

Given Edinburgh's prominent role in the regional and national economy and the relationship of its economy with surrounding areas in providing jobs, it experiences high levels of in-commuting, with 60,000 in bound car journeys daily. In order to address congestion, air quality and carbon impacts, investment in decarbonised public transport systems is a priority to promote travel behaviour change away from private cars. The scale of rail capacity (including within the city), tram network, bus transit and active travel interventions required to support national and regional carbon neutral commitments is significant. As well as Choices for City Plan 2030 the Council's City Mobility Plan sets out how the Council can progress on this agenda, however, the wider area impacts of travel as a result of nationally significant city and region economic growth need to be recognised in NPF4 as well as the National Transport Strategy and STPR2 as requiring national as well as regional and local action. This includes for ticketing and charging options to allow switching of mode easily which will need to include for national action on rail fares in particular.

Edinburgh is developing carbon neutral polices for development. For this to succeed these will need to be replicated across the region, providing sufficient density to sustain public transport capital and revenue costs.

Funding principles

NPF 4 is also an opportunity for Scottish Government to set out principles on:

- Extent to which new development should be located to make good use of existing infrastructure and where infrastructure can be extended, particularly

in locations where market demand is low. This will support carbon neutral development.

- Extent to which the capital cost of the infrastructure capacity enhancements required to support growth should be paid for by developer contributions from that growth's developments.
- Sources of public funding to address any gaps arising.
- Whether the tests in Circular 3/2012 adequately protect public finances from the costs of growth.
- Whether the planning system should operate on a 'full cost recovery' model for capital investment in infrastructure needed to address cumulative and individual impacts of growth.
- Whether the revenue (e.g. maintenance) costs of infrastructure arising from growth should be a factor in setting spatial strategies for growth.

The linkages of this to the housing land measurement issue as commented on above are as follows:

- Good use and planning of infrastructure needs a reliable picture of where and when growth is going to occur. CEC's approach to measuring housing land and delivery as separate things supports this.
- A separate measurement approach de-incentivises overly-optimistic programming of completions, and so provides more reliable timings of growth for infrastructure providers to base their investment plans on.
- A separate measurement approach also reduces the likelihood of excessive land release, and hence infrastructure requirements, simply to address a slow rate of housing completions.

Supported Strategic Transport Improvements which require NPF4 consideration as supporting growth of national significance

Strategic Walking and Cycling Routes including cross boundary connections - specify East Coast Mainline Ongoing and Planned Improvements including formation of four track section in East Lothian to create capacity increase and high speed rail to England

Edinburgh Waverley Capacity Improvements, including potential for intensification of rail use within urban Edinburgh and Edinburgh cross-rail services

Potential Kirkliston Rail Station

Winchburgh Rail Station

Halbeath Rail Halt

Edinburgh-Glasgow via Shotts Rail Line Electrification

East Linton and Reston Rail Stations on new Edinburgh - Berwick-Upon-Tweed service

Levenmouth Rail Link

Rail connection between SE Scotland and SW Scotland via Dumfries, extension of Borders line to Carlisle

Consideration of rail links to port facilities as part of national economic strategy

Tram extensions: City Centre to Edinburgh BioQuarter and connection to Midlothian and East Lothian; Newhaven to Granton; Roseburn to Granton and Ingliston to Newbridge, with potential for regional connections to Kirkliston and West Lothian
Park and Ride Schemes

Edinburgh Orbital Bus and Associated Park & Ride Sites

A720 Improvements, including Sheriffhall Junction - Junction Upgrades, Intelligent Transport Systems and Non-Car alternatives