

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.

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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; and
 - 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;
- Deliver fairer distribution of the benefits of growth and be more inclusive for all communities; and
- 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

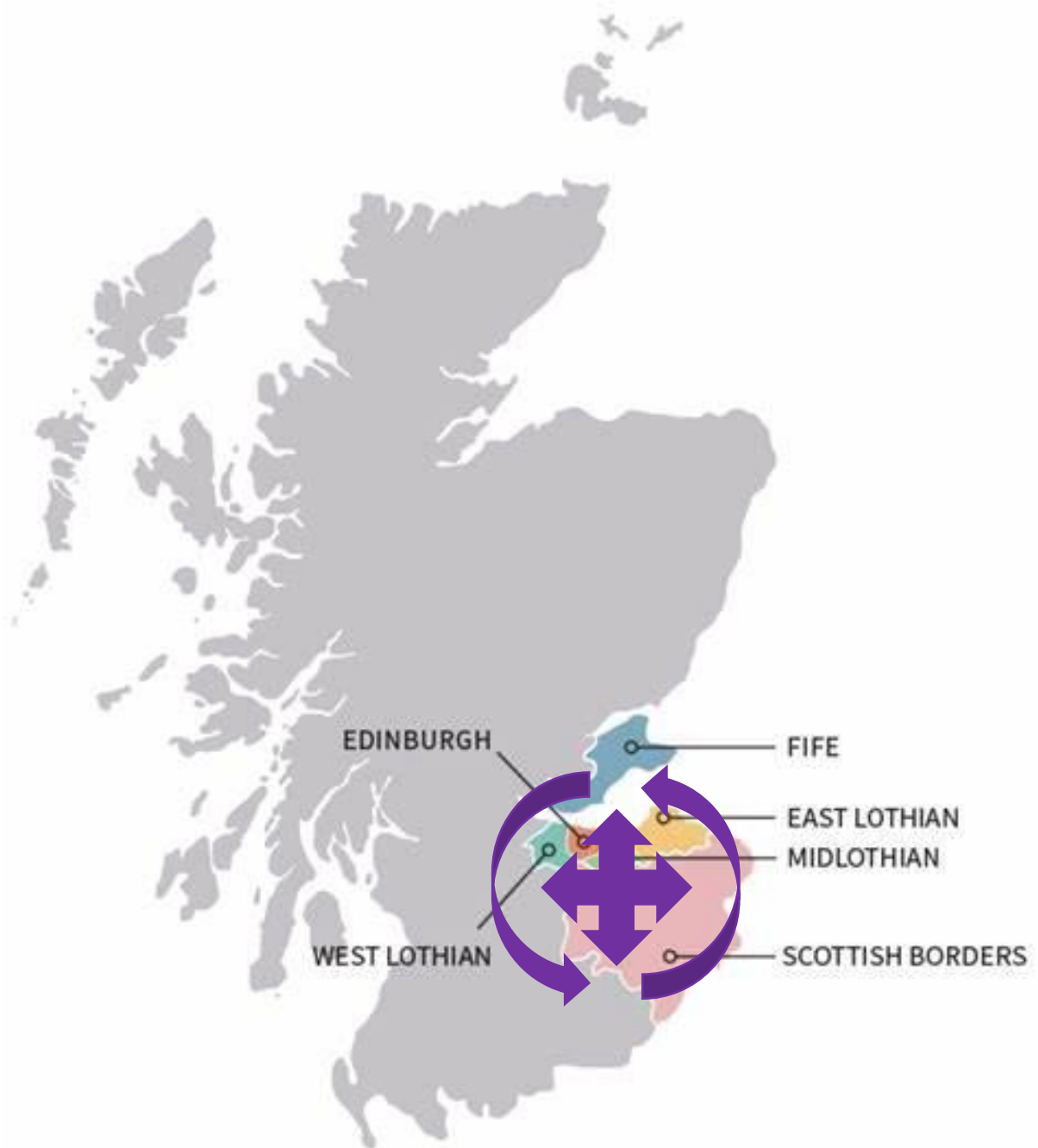
5. Background reading/external references

- 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

1. National Planning Framework 4 “Call for Ideas” – Edinburgh and South East Scotland Regional Response

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 Tay Cities 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 Region 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**.

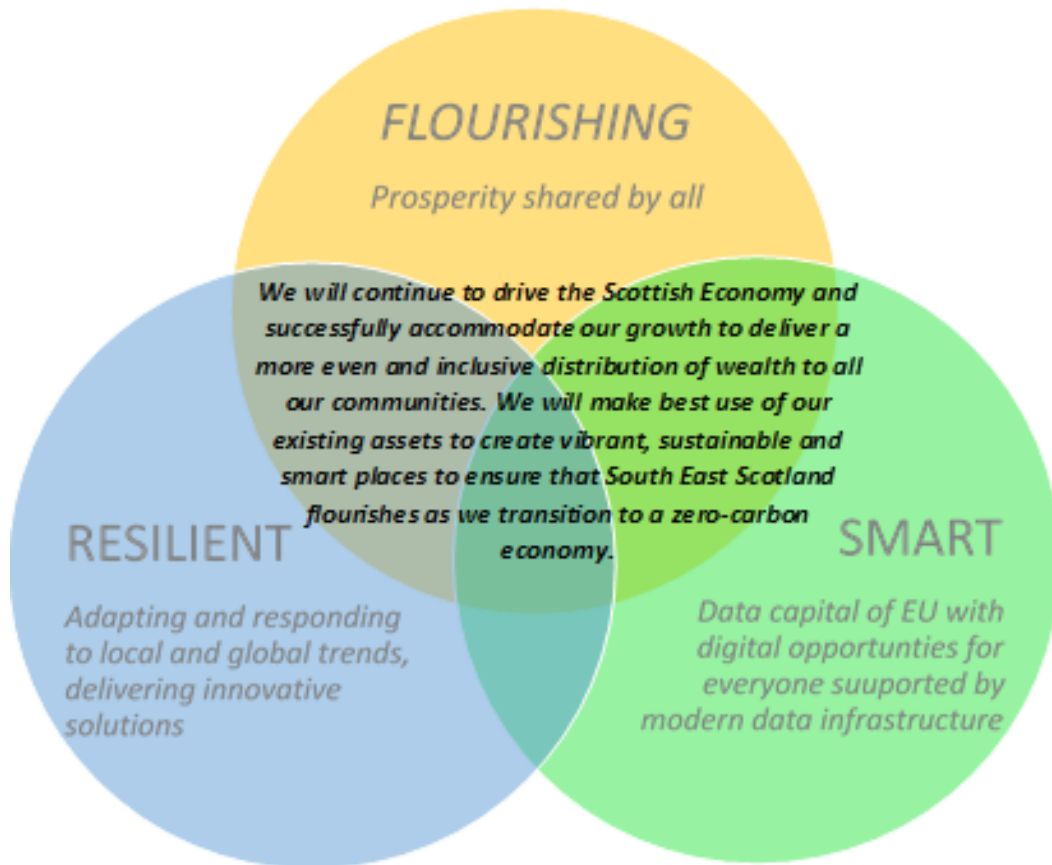


Figure 1 – Emerging RGF themes

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 Tay Cities 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 – 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 and South East Scotland 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 Region 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 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.