

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 notes 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