

## Midlothian Council - National planning Framework 4 (NPF4)

### Response to the Scottish Government's 'Call for Ideas' - Consultation Questions set by the Scottish Government

#### ***Q1 – What development will be needed to address climate change?***

The Scottish Government has set a target to be net zero carbon by 2045. Midlothian Council declared a climate change emergency in December 2019 and set its own target to be net zero carbon across all its activities by 2030. To meet these ambitions there will need to be a step change in collective responsibility and action, together with a shift in policy and financial levers to deliver change and to stop contributing to climate change. Key issues in this context are, amongst other things, transport and travel, building design and energy efficiency and the transition to a low carbon economy.

To deliver this aim NPF4 should:

- Provide a clear policy framework as to how Local Development Plans (LDPs) achieve lasting modal shift in terms of transport and travel, particularly in respect of commuting journeys and how they can contribute to reducing carbon emissions from transport in their area. In areas of high travel demand between Edinburgh and Midlothian, transport solutions should be identified and prioritised at a strategic level on the basis of the contribution they make to sustainable travel and achieving modal shift as well as the contribution they make to improved traffic management;
- NPF4 should support; the Sheriffhall grade separation project, the provision of Park & Ride facilities at junctions along the A720 City Bypass, the provision of a A720 City Bypass orbital bus/tram service and the extension of the Edinburgh tram network to Dalkeith and/or the Midlothian Science Zone via the Straiton Retail Park/Strategic Commercial Land Allocation (EC3 in the Midlothian Local Development Plan) and looking to the future the tram network extends to other Midlothian Centres;
- Support the decarbonisation of the energy supply system by requiring the development of community/district heating schemes and heat networks utilising renewable heat sources (solar, geothermal) particularly high heat users (hospitals, schools and data centres/hubs);
- Remove requirement on LDPs to safeguard areas of search for coal;
- Introduce a change in building standards to meet a zero carbon standard for all new buildings and extensions to buildings. Remove the ability for developers to construct 'new dwellings' under an historic building standard specification by banking building warrants prior to construction commencing;
- Provide guidance on the role the Scottish National Investment Bank to support net zero carbon development and to align the proposed "Green City Region Deals" with the Regional Spatial Strategy process and LDP development strategies.
- Adopt the provision of designing and delivering green/blue infrastructure as best practice, including as part of any significant development scheme;

- Promote the wider application and use of Sustainable Growth Agreements to promote sustainable development and low and zero carbon design principles and good practice; and
- Provide guidance on how the proposed forestry and woodland strategies identified in the Planning (Scotland) Act 2019 can or should align with proposed LDP development strategies.

**Q2 – How can planning best support our quality of life, health and wellbeing in the future?**

Midlothian is the fastest growing local authority area in Scotland. The pace and scale of housing growth is now visibly changing the appearance and character of many of our communities and the associated demographic changes are creating additional demands on services, in particular GP services but also education provision. Planning is a balancing act between delivering sustainable growth, managing community expectations and delivering on targets and requirements (in particular housing targets).

To deliver this aim NPF4 should:

- Introduce a requirement for an *'Infrastructure First'* principle to be established when considering growth strategies and site specific housing and economic land allocations in cities, towns and villages and to facilitate forward funding of essential infrastructure and partnership arrangements to deliver proposed development strategies in adopted development plans;
- Provide clear guidance on the methodology and process to be adopted in calculating Housing Supply Targets, clearly set out any requirements regarding the composition of these targets (i.e. market, affordable, special needs sectors etc.); establish what rights or opportunities there will be for local authorities to challenge these targets and the weight given to prevailing local circumstances;
- Introduce a requirement to provide bespoke housing for the elderly (bungalows) to meet the demands of an aging population;
- Consider introducing *'areas of constraint'* for new housing development when local infrastructure and service capacity is not in step with the pace of planned development and increased demands from a growing population. These restrictions would remain in place until there was a clear commitment by a developer or relevant agency or provider to delivering the necessary infrastructure/facilities. At this point the local development plan action programme could signal a change in circumstances, propose the removal of the constraint and signal in principle support for planning applications;
- Require and provide policy support for LDPs to include active travel policies and identify proposals that would improve and expand existing path networks, provide new connections to the existing path network, reprioritise existing road space and develop new routes dedicated to walking and cycling and public transport; and
- Seek to promote the principle of Biodiversity net gain in all new developments and redevelopment/regeneration schemes.

**Q3 – What does planning need to do to enable development and investment in our economy so that it benefits everyone?**

Planned housing growth is helping to support the construction sector in Midlothian. The associated increase in the population is expanding the County's customer base and in recent years, there have been a number of commercial/retail developments on established retail park and industrial sites, particularly at Easter Bush/Midlothian Science Zone. However, the annual take-up of economic land (the basic measure of economic performance) remains relatively low and in a buoyant housing market there is a persistent risk of challenge and change of use of allocated economic sites to housing.

To deliver this aim NPF4 should:

- Grant funding to Councils to support economic development in disadvantaged areas;
- Introduce a policy presumption against the loss of economic land to alternative land uses (outwith an LDP review);
- Promote job generation as the primary consideration in determining applications on economic land allocations;
- Reinforce the *'town centre first'* policy – but acknowledge that town centres are changing and are not necessarily retail dominant and can be based around other economic activity, social interaction and cultural and entertainment activities; and
- Require Active travel and public transport links and services to be accessible to proposed development and to require off site provision by developers to achieve this if required.

**Q4 - What policies are needed to improve, protect and strengthen the special character of our place?**

Midlothian has benefitted from investment in its built heritage and town centre environments in Dalkeith, Gorebridge and Penicuik through the Conservation Area Renewal Scheme and Townscape Heritage Initiative schemes. In terms of town centres, residential and commercial neighbourhoods, good design, civic spaces, amenity space, parks and landscape are key features which contribute to the "quality" of a place.

To deliver this aim NPF4 should:

- Continue the current policy protection for listed buildings, conservation areas, town centres, open spaces and green networks;
- Require new development to contribute to wider place-making objectives and community building – give Councils the tools to reject dormant commuter based housing estates; and
- Promote good design, support Councils in refusing applications which are of poor design.

**Q5 – What infrastructure do we need to build to realise our long-term aspirations - transport, education, health, open space, active travel?**

Midlothian is the fastest growing local authority area in Scotland. The pace and scale of housing growth is now visibly changing the appearance and character of many of our communities and the demographic changes are creating additional demands on services, in particular GP services but also education provision.

To deliver this aim NPF4 should:

- Provide clear and unambiguous guidance on how to calculate and assess the five year effective housing land supply – this will enable Council's to improve the planning and delivery of services;
- Requiring '*front loading*' of physical and social infrastructure;
- Active travel and public transport to be identified and delivered as part of the first phase of new developed – to ensure modal choice for travel is established at the outset;
- Reintroduce a minimum percentage threshold for affordable housing and allow Council's the flexibility to adjust upwards where there is evidence of need and/or the providers with capacity to deliver; and
- The strategic transport infrastructure identified in question 1.