



T: 0131-244-7975  
E: lorna.aird@gov.scot

Keith Miller  
City of Edinburgh Council  
By email: [cityplan2030@edinburgh.gov.uk](mailto:cityplan2030@edinburgh.gov.uk)

30 April 2020

Dear Keith,

### Choices for City Plan 2030 – Edinburgh City Council Main Issues Report

I refer to your email of 5 February 2020 informing Scottish Government of City of Edinburgh Council's consultation on the Main Issues Report Choices for City Plan 2030. The consultation began on Friday 31 January and runs until 30 April 2020.

We welcome the opportunity to comment on the Choices for the City plan document, appreciate its positive and forward-looking approach, and its accessible format. We also support the overarching vision and outcomes that are being sought by 2030. We are conscious that both climate change and the current pandemic present significant challenges for development planning and cities and that the latter is a fast-moving situation. We expect these will continue feature in your thinking as you move forward and that the Council will be considering how this context may influence the key choices for the plan.

The Scottish Government do not routinely comment on Main Issues Reports in detail. However, having looked at the City Choices plan, there are a number of areas we think it would be worth discussing in further detail as the plan progresses:

- Housing
- Developer contributions
- West Edinburgh
- Transport
- Supplementary Guidance



We would be happy to arrange a meeting to discuss these comments further and to provide further clarity on the role of NPF4 to ensure that references made to NPF4 in the proposed plan are accurate, if you would find that helpful. In relation to transport matters, we are keen to work with you and Transport Scotland to prevent issues becoming longer term obstacles to the plan. We have also taken the opportunity to add a short consultation response (with input from Transport Scotland) by theme at **Annex A** to this letter.

Yours sincerely,

**Lorna Aird**  
**Planner**

## ANNEX A – Response to consultation

### West Edinburgh

We support the recognition of the West Edinburgh Study within the MIR and the approach of allowing City Plan 2030 to take into account the findings of the Study. Given the importance of the West Edinburgh area, Scottish Government's interests and previous Development Planning interventions, we would be keen to discuss this further with you as the Plan and Study progress.

### Housing

In the proposed plan, we would find it helpful if a clear explanation is given as to how the housing figures have been arrived at. We would also encourage that the proposed plan uses the same terminology as SPP uses when discussing housing policy. We would also like to see the proposed plan include information on how specialist housing requirements will be provided.

We would be happy to arrange a meeting to discuss these comments further and to provide further clarity on the role of NPF4 to ensure that references made to NPF4 in the proposed plan are accurate.

### Developer Obligations

We note the proposed approach to seeking developer contributions, including the use of cumulative contribution zones. The appropriateness of such an approach, and its compliance with relevant case law and national policy, will depend on the quality of the underpinning evidence.

The Council's proposed approach is to stop using supplementary guidance and set out guidance for developer contributions within the plan, action programme and non statutory guidance. Whilst we support the move away from supplementary guidance, it will be important to ascertain the level of detail that will be in the plan itself. We would be happy to engage further with CEC on this matter.

### Historic Environment

We would remind the Council of the policy principle set out in paragraph 137 of **SPP** with regard to 'Valuing the Historic Environment' and managing change sensitively to avoid or minimise impacts on the fabric and setting of historic environment assets. In preparing the proposed plan, the Council should consider the potential impact of proposals on the historic environment and how this might be addressed. In particular in relation to proposals around green and blue infrastructure, density and zero carbon technologies.

Historic environment could be included as a designation layer in the maps used as far as practicable.

Further, more detailed comments on this aspect can be provided to aid in plan preparation if required.

## Forestry and Woodland Strategy

Consideration should be given in the proposed plan to identifying woodlands of high nature conservation and include policies for protecting them and enhancing their condition and resilience to climate change, in line with Paragraph 201 of SPP.

Previously, forestry and woodland strategies were encouraged to be prepared through supplementary guidance. It is now a statutory duty established through the 2019 Planning (Scotland) Act, for planning authorities to prepare, consult on and publish a 'forestry and woodland strategy' setting out policies and proposals in their area as to the development of forestry and woodlands. This will include protection, enhancement and expansion of woodlands, their resilience to climate change and any other matter which the planning authority consider appropriate.

## Vacant and Derelict Land

We recognise the options being considered in relation to the balance between greenfield brownfield land in order to achieve a sustainable approach to development and that there are challenges around this including delivery and development viability. It is considered important that the findings of the Scottish Vacant and Derelict Land survey should feed into the proposed plan preparation process.

## Minerals

It is important that the Proposed Plan has policies around minerals that both protect future sources and in the absence of a new Strategic Development Plan, explain the context in which the steady supply of minerals is maintained. As you are aware, paragraphs 237 to 241 of SPP 2014 set out what is expected in terms of minerals policies.

## Transport

Consideration should be given as to whether there is a need to safeguard further disused railway lines in line with SPP paragraph 277 and ports in line with SPP paragraph 283. NPF3, paragraph 5.14 also encourages local authorities to develop at least one cycle and walking exemplar. The forthcoming NPF4 is likely to retain a strong emphasis on the importance of active travel and its contribution to health and climate change agendas and so we welcome the emphasis and support for this within the Choices document.

## Transport Scotland comments

We welcome the new and challenging preferred strategy the Council is proposing to address the increasing impact of climate change and the focus on ensuring growth is sustainable. Transport Scotland welcomes your ambition and supports the approach to delivering housing on brownfield land. The approach, particularly the need to plan development based on the provision of public transport, is welcomed and aligns well with the Strategy's vision, priorities and outcomes as well as the sustainable travel hierarchy.

As discussed and outlined in previous meetings, Transport Scotland requires to fully understand the cumulative implications of the spatial strategy options on the strategic transport network in line with Scottish Planning Policy and Development Planning and Management Transport Appraisal Guidance (DPMTAG). This would comprise unconsented sites being brought forward from the previous LDP and any new sites being proposed. While Transport Scotland supports the Councils preferred housing option, we would also need to understand the cumulative impact of the greenfield site options given the potential for significant impact on the A720(T) and M9(T) and the potential for new or upgraded infrastructure.

We understand the Council is proposing to undertake this work, and some being progressed through the West Edinburgh Spatial Strategy, yet we have concerns over the timing of the work and the need for the outcomes to genuinely influence and inform the plan strategy. The appraisal will be required to identify any impact and any required new infrastructure, with the plan clearly outlining the funding and delivery mechanisms for any such new infrastructure in line with SPP paragraph 275. It is not considered appropriate to leave the identification of new infrastructure necessary to facilitate development of the plan to the Action Programme. Furthermore, you are of course aware that the plan should set out broad types and locations of contributions and Supplementary Guidance should only identify exact financial contributions and methodologies with Circular 6/2013 stating Supplementary Guidance is limited to the provision of further information in respect of policies or proposals set out in the LDP.

We are also looking for an update on the commitment below included in the City Region Deal Document, signed in August 2018:

*Partners will put in place a Regional Developer Contributions framework based on the work currently being led by SESplan (the strategic development planning authority for Edinburgh and South-East Scotland) and findings of the Cross-Boundary Study, published in 2017. These interventions and commitments, taken with the additional transport investment to enable the innovation and housing projects, will help ensure the city region continues to grow and flourish.*

There is no reference to this within the Choices Paper. This should be reflected in your plan and those of your South East Scotland City Region Deal (CRD) partners. We will press for progress on this important commitment at the next CRD Transport Appraisal Board.

On the West Edinburgh Spatial Strategy (WESS) work it was understood from the workshop for the study on 18 February that this piece of work was going to be the transport appraisal to support the LDP for the wider West Edinburgh area. This was highlighted as including allocations from Kirkliston potentially down to Riccarton which would incorporate Calderwood and West Edinburgh albeit the study area for the WESS is not explicitly defined. From the most recent information on the options for this study that was shared with us there remained some large gaps in information and rationale in terms of the type of appraisal we would expect to support a plan as outlined in DPMTAG. Our e-mail to your colleague Andrew Caldwell of 6 March indicates our comments on the assessment criteria for the study and queries regarding fit with DPMTAG.

We wrote to you on 25 March regarding the various transport workstreams being led by the Council. We suggested you liaise with your transport colleagues to draw these together with their respective land use assumptions and transport appraisal of these; how they fit with the Choices options and contribute towards or cover what would be the DPMTAG appraisal for your plan. Following that exercise you will be able to identify whether there are any areas

that are not covered/where the gaps are. We had requested that you prepare a note on outlining this in the first instance we can advise on any next steps thereafter. We have not received this to date and look forward to further engagement on this work. We indicated that you would not want to unnecessarily start a further workstream if the appraisal of your land uses is either covered elsewhere or existing studies can be supplemented to do so and be delivered within your plan timescales. While Transport Scotland's staff and resources have been pivoted towards responding to the current emergency, we will endeavour to advise further subject to other pressures at the time.

