

Consultation Responses to NPF4 Call for Ideas

1 INTRODUCTION

- 1.1 This report advises the Board on:
- SEStran’s submission to the NPF4 “Call for Ideas”,
 - the Edinburgh and South East of Scotland City Region Deal (ESES CRD) Joint Committee’s response, and-
 - the local response being prepared by East Lothian Council.
- 1.2 SEStran’s own draft submission to NPF4 is included at **Appendix 1** for approval.
- 1.3 The ESES CRD response was recommended for approval at the meeting of its Joint Committee on 6 March, subject to ratification by individual Councils, SESplan and SEStran. SEStran was notified of this request on 11 March 2020.
- 1.4 This report recommends that the Board agrees not to ratify the whole ESES CRD response, but agrees to endorse the approval of amended answers to the 5 questions posed, provided at **Appendix 2**. The amendments are proposed by SEStran in order to demonstrate the necessary alignment with the Regional Transport Strategy.
- 1.5 East Lothian Council has agreed the outline of key elements for a proposed NPF4 consultation response at its meeting of 25 February, and has requested endorsement by SEStran. This outline is provided at **Appendix 3**. The report recommends that the Board agrees to endorse the key elements of East Lothian Council’s response.

2 NPF4

- 2.1 The National Planning Framework (NPF) is a long-term spatial plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth.
- 2.2 The Scottish Government has started work to prepare the fourth NPF (NPF4) which will look to Scotland in 2050. It will guide spatial development, set out our national policies, designate national developments and reflect regional spatial priorities.

- 2.3 NPF4 is expected to look very different from NPF3, with a longer time-horizon, fuller regional coverage and improved alignment with wider programmes and strategies, including on infrastructure and economic investment. In particular, NPF4 will need to align with the outcomes in the National Performance Framework; respond to the shift to inclusive growth; improve health and well-being for the people of Scotland, improve equalities and eliminate discrimination; provide a spatial planning response to the Global climate emergency; provide a renewed focus on rural development including rural repopulation; and give a stronger steer on housing delivery and diversification including the setting of targets on land for housing.
- 2.4 NPF4 will for the first time incorporate Scottish Planning Policy (SPP) and will take on enhanced status as part of the statutory development plan. Research on the operation and effectiveness of the current SPP will be published shortly.
- 2.5 NPF4 will also take into account regional spatial strategies which are likely to be prepared by local authority partnerships.
- 2.6 The Planning (Scotland) Act 2019 includes legislative requirements on the review process, including up to 120 days consideration by the Scottish Parliament. The aim is to carry out intensive early engagement during January to March/April 2020 before laying a draft in Parliament for consultation around September 2020. Public consultation will run alongside Parliament's consideration. Following this formal consultation, the final version will be laid before Parliament in 2021. NPF4 will be approved by Parliament before it is adopted by Scottish Ministers.
- 2.7 NPF4 will be subject to a number of impact assessments including the Fairer Scotland Duty, Strategic Environmental Assessment, Equality Impact Assessment, Islands Impact Assessment, Business and Regulatory Impact Assessment, plus Children's Rights and Well-being Impact Assessment. Key stakeholders and the public will be properly consulted with at key stages in the process.
- 2.8 The NPF4 "Call for Ideas" asks all consultees for answers to five questions (listed below), to be submitted by 31 March 2020.
1. What development will be needed to address climate change?
 2. How can planning best support our quality of life, health and wellbeing in the future?
 3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?
 4. What policies are needed to improve, protect and strengthen the special character of our place?

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

3 SESTRAN RESPONSE TO NPF4 “CALL FOR IDEAS” (APPENDIX 1)

3.1 SEStran’s response to NPF4 focuses on encouraging NPF4 to reflect the importance of a demonstrable link between Regional Spatial Strategies and Regional Transport Strategies (RTSs). RTSs provide the statutory framework by which one or more planning authorities can help plan for developments that will help increase regional mobility and improve the efficiency of strategic movement through regions. SEStran’s view is that NPF4 developments must reference RTSs priorities in order to help achieve the wider NTS2 priorities.

4 ESESCRD RESPONSE

4.1 The Edinburgh and South East Scotland City Region Deal Joint Committee have considered a draft response which incorporates an extensive introduction. The Joint Committee was recommended to approve the response subject to ratification by individual councils, the SESplan Joint Committee and SEStran before it is formally submitted to Government on 31 March 2020. A link to the covering report, including introductory element and response to the five key questions can be found under Background Reading.

4.2 The aforementioned introduction, in discussing the desired partnership approach to delivering on the various policies, does not appear to recognise the essential part to be played by the council partners’ statutory Regional Transport Strategy (RTS), making it inappropriate to recommend to the SEStran Board that it ratifies the whole document.

4.3 However, the ESESCRD response also includes answers to the five questions posed by government in respect of the NPF4 consultation and which could be amended and potentially endorsed by SEStran.

4.4 Concurrent with this exercise, there are a number of interrelated processes recently completed or underway which will have a bearing on the emerging NPF4 and which will influence the response to the above questions. These processes include NTS 2, the re-write of the RTS, STPR2, the work of the Infrastructure Commission and the review of regional governance. In respect of future governance, the seven RTPs have promoted the view that transport and planning must be jointly governed at a regional level in the belief that without this joined up arrangement, a sustainable transport policy which will meet the objectives set out NTS 2 will not succeed. In the now clear climate emergency environment this is of paramount importance. The RTPs have further promoted the view that such governance should build on the existing statutory partnerships, independently resourced and managed to be able to provide a truly regional perspective.

5 EAST Lothian Council's NPF4 Call for Ideas – Summary of Key Points (Appendix 3)

5.1 At its meeting on 25 February 2020, East Lothian Council considered key elements of an early draft response to the NPF4 Call for Ideas, and the relevant extract of that report has been included at **Appendix 3**. This outline of East Lothian Council's proposed response to NPF4 will be included within a wider report to be approved under delegated authority before being submitted to the Scottish Government by the 31st March. The description of the key elements of developments proposed in the East Lothian area will form the basis of a response to the five standard NPF4 questions. The proposed outline for the Council's NPF4 submission accords with the RTS objectives and policies, and provides context for the role of the Strategy in relation to the development of key NPF4 sites.

6 RECOMMENDATIONS

- 6.1 That the Partnership Board approves SEStran's draft NPF4 Call for Ideas response for submission;
- 6.2 That the Partnership Board does not ratify the entire ESESCRD Joint Committee's response to NPF4;
- 6.3 That the Partnership Board endorses the ESESCRD Joint Committee's answers to the five "Call for Ideas" questions, subject to the amendments noted, and instructs the Partnership Director to liaise with the ESES Team to conclude the submission.
- 6.4 That the Partnership Board endorses the proposed key elements of the East Lothian Response.

Jim Grieve
Partnership Director
13 March 2020

Appendices

1. SEStran response to NPF4 "Call for Ideas"
2. ESESCRD Response to NPF4 "Call for Ideas" Questions with SEStran Amendments
3. East Lothian Council's NPF4 "Call for Ideas" – Summary of Key Points

Policy Implications	None
Financial Implications	None
Equalities Implications	None
Climate Change Implications	None
Background Reading	Report: ESES Regional Response to National Planning Framework 4 “Call for Ideas”: https://democracy.edinburgh.gov.uk/documents/s14948/Item%205.4%20-%20ESES%20Regional%20Response%20to%20National%20Planning%20with%20app.pdf

SEStran Response to NPF4 Call for Ideas

What do you want planning to do for your place?

Taking into account these long term changes, we are now keen to hear your views on the future of planning in Scotland, focusing on the following questions:

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

think about... what we will need to do to reach the target of net zero emissions by 2045; the opportunities that this could provide to support jobs and the economy; how places can be made more resilient to the long term impacts of climate change; what climate change-friendly places might look like in the future.

Development by its very nature is somewhat set against the ambitions of reduced emissions. In order for the economy to grow and encourage more jobs, further development is required. Mitigation can be made in as much as developments must meet high standards of sustainability for housing quality, quality of life, areas of nature and exploration of the outdoors, high quality workplaces that can be made flexible to growing trends, and transport connections that limit the ease of car use in favour of mass transit and physical exercise options.

As identified in the Infrastructure Commission for Scotland Report 2020¹, an infrastructure first approach must be taken towards development. Appropriate infrastructure must be in place to be more than capable of handling long term impacts of climate change and climate events in increasing frequency in new developments and appropriate measures should be undertaken to address existing development. Planning guidance for green and blue infrastructure should be updated, (current policy dates from 2006² to 2011³), to reflect the increased impact of climate change and move to regulation of implementation rather than best practice. Adopting these infrastructures will improve resilience for climate impacts whilst offering opportunities to encourage carbon capturing and boosting biodiversity in all communities.

To a large extent much residential development over the last ten years has favoured car above other transport modes, and while this is now being addressed through better development and street guidance there are opportunities to enhance neighbourhoods with sustainable solutions such as mobility hubs. SEStran through its partnership in the INTERREG Share North programme⁴ has shared learnings from other EU nations implementing options that provide choices for travel and convenience, such as parcel collection points and shared vehicles (cars, e-bikes, e-cargo bikes). SEStran are developing a Mobility Hub Strategy that will aid the South East of Scotland regional partners in establishing hubs throughout the region following best practice. Opportunities should also be sought to implement these options in existing high-density developments. All developments both residential and commercial, need to develop from a presumption of access by public transport and active travel, in order to provide opportunities for all.

At a regional level, one key impact from the evident population shift in Scotland towards major cities, and of re-settlement from areas on west to areas on the east of Scotland, is that the levels of demand for transport will increase quickly across the

¹ [Infrastructure Commission Scotland](#)

² [PAN79 Water & Drainage](#)

³ [Green Infrastructure](#)

⁴ [INTERREG Share North](#)

entire SEStran area, impacting on transport system capacity. These trends in population movement are anticipated to continue for the next 20 or so years

In a period where rapid decarbonisation of transport is required, yet the demands for transport are increasing, strategic decisions around sustainable infrastructure investment need to be taken at a regional level, to ensure objective assessment of different infrastructure and other transport investments - thus supporting overall positive outcomes across an entire region, rather than locally positive changes that have negative consequences in neighbouring areas. This is particularly relevant to the provision and standardisation of EV charging infrastructure, with opportunities to support existing re-fuelling businesses to provide for the transition to EVs and support a behaviour that is prevalent in favour of widespread neighbourhood charging locations.

Regional co-ordination of transport development and delivery is the most effective way to ensure a high level, objective approach across expanding 'travel to work' areas, during a time critical time window for achieving Scotland's Climate Change (Emissions) Act 2019 targets. The need to formally strengthen the link between RTPs Regional Transport Strategies (Statutory), and local development planning and Regional Spatial Strategies development is also time sensitive.

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

think about... where we might want to live in 2050; how many and what types of homes we will need; how we can encourage more people to live in rural Scotland; whether we could target development to address longstanding differences in health and quality of life; whether and where we might need new settlements, and regeneration of existing communities; how places could be more inclusive, diverse, creative, vibrant, safe, resilient and empowering.

As with many areas within the United Kingdom there is continued evidence of a desire for home ownership. In Scotland in 2017, owner occupier and buying with a mortgage represented 63% of all households⁵. What this figure expresses in terms of type of home is harder to determine. In the United Kingdom there is an 80% bias for houses rather than flats for all tenure types. There remains a desire for those with family to seek housing that provides space for play and leisure in a safe environment. This continues to work against the need for higher density living when population trends continue towards urban living. This pressure is compounded by the increasing trend of smaller households, putting further demand on the stock required per head of population.

As discussed in the previous question, more green and blue infrastructure in developments and towns provide a multiplicity of benefits as expressed in the 2011 guidance documents, some of which would address the social desire for safe spaces for play and leisure. Currently there remains a desire to maximise brownfield sites for development to reduce urban sprawl, but the resultant effects often mean a less attractive location with higher living concentrations and associated externalities. Often where there is a desire to utilise a brownfield site, full consideration is not given to the wider impacts on utility demand and public services through increased density. Where a brownfield site becomes available options should be explored for green and blue infrastructures, which provide greater opportunities for permeability in towns and

⁵ [UK Housing Review 2019](#)

places to rest, enhancing the accessibility of our communities, and opportunities for carbon capture.

New settlement areas provide the opportunity for greater wholistic planning across all directorates, however while they can provide for housing, healthcare and education, there is less influence on employment to reduce the need to travel. Additionally, connections between settlements are not often planned in advance resulting in further reliance on private cars. Greater sustainable transport provision needs to be implemented prior to the completion of developments to enable communities to access services with more travel choices. In order to facilitate this, there needs to be greater Regional governance by statute, and alignment of strategic plans across policy.

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

think about... what our economy might look like in 2050; how planning can anticipate and respond to the economic challenges of Brexit; what the key sectors might be and what infrastructure they may need to support them; how planning could stimulate and distribute growth; what type, scale and distribution of business and industrial land and premises will be needed; where significant investment sites might be; how economic opportunities could improve, or be accessible from, places where deprivation is concentrated.

To be effective, the planning system must be capable of dealing not only with land use but with the broader social, environmental and economic aspects of urban ecosystems and strike a balance, in which the development needs are met in the most sustainable way. In addition, successful urban revitalisation needs an integrated long-term strategy that includes measures related to several policy areas such as mobility, housing, cultural heritage, start-up support. This can be achieved through effective, regional governance of these policy areas.

There is clear evidence that a lack of accessibility to transport options has a limiting effect on opportunities and that those who are least skilled, or remote from the labour market have the least location flexibility in seeking new job or training opportunities. Therefore, SEStran views transport and accessibility/affordability of transport as integral to an inclusive economy. The links between transport, health and employability are complex but it is clear from academic evidence that mental and physical health are negatively affected if an individual is not able to participate fully in society, and a lack of transport options can be a contributory factor. Active travel, however, could be part of the solution in breaking down such barriers.

In supporting the ambitions of the new National Transport Strategy, existing road infrastructure must be optimised for the use of sustainable transport modes, creating a viable option for mode shift. This could be achieved by consideration for more bus only routes to address congestion on strategic movement corridors. Further opportunities from this prioritisation would arise for autonomous bus use along such routes, drawing lessons from the forthcoming ForthCAV project. Critically these supporting infrastructures need to make connections with transport hubs including access to airports, to facilitate public transport and active travel, ensuring connections from all surrounding areas.

In recognition of the gateway role to the South East of Scotland, the SEStran region is home to a large concentration of freight operations. A detailed assessment of the necessary infrastructure, operational financial and contractual requirements needs to be undertaken to ensure buy-in and commitment to a sustainable freight strategy. It

must be linked to policy development at a local, regional and national level whilst sustaining economic activity.

NTS2 recognises the importance of freight to the success of Scotland's economy, but also urges to ensure that the negative impacts generated by the movement of goods vehicles are addressed "The freight sector will have to respond to the increasing need to decarbonise through the use of new technologies and business models, as well as adapting to changing demands of consumers." Planning decisions nationally need to support opportunities to maximise freight by modes other than road, while at regional and local levels freight hubs on the periphery can service towns and cities with ULEVs and e-cargo bikes.

To aid the transition of freight from reliance on road transport, opportunities should be sought to optimise sea transport where practical. Planning decisions to reduce congestion around ports would make this option more attractive to operators and allow for action on tackling emissions in these areas.

SEStran through its partnership in the INTERREG SURFLOGH⁶ programme has shared learning from other EU nations and direct experience in Edinburgh supporting first and last mile delivery through the use of cargo bikes and urban consolidations centres (UCCs). Planning decisions will require mixed use developments to facilitate such freight hubs and consolidation points in strategic locations around cities and towns.

Regional Transport Strategies provide the necessary framework to ensure adequate investment into public transport provision, intermodal hub development and other regional transport investment decisions that support sustainable movement in the region.

Without Regional coordination of interventions there is a significant risk of poor connectivity between neighbouring local infrastructure investments or overreliance of car / road use. This could potentially constrain economic growth potential across city regions and around key NPF4 development sites.

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

think about... what special places will need protection in the future.; what the future might be for our rural, coastal and island communities; how we could unlock the potential of vacant and derelict land; what our city and town centres might look like in the future; whether we need to think about the concept of green belts; how we can get the most out of our productive land; how we can protect and restore peatland; how we can plan blue and green infrastructure; what we can do to protect and enhance biodiversity; and how we can strengthen the character and heritage of our many different places.

In 2017 , 40% of dwellings fell below the Scottish housing Quality standard and, while this marks a near 30% improvement over 15 years, it continues to highlight that there are inequalities in the places where people live. Of particular note is that almost 9000 homes were deemed to be not healthy, safe or secure. This represents more than half of all housing completions in Scotland for that year (UK housing review 2019). While this represents a clear shortage of quality housing, the continued delivery of

⁶ [INTERREG SURFLOGH](#)

housing that takes no cognisance of historical design weakens the character and heritage of our places.

For a number of years, the Scottish Government has had the ambition to integrate policy across portfolios to best utilise investment and produce a holistic and integrated solution. SEStran would continue to advocate for this approach but to date there has not been a suitable framework to act on. Effective, statutory regional governance can elicit collaboration from multiple local authorities across a spectrum of policy areas. If such bodies are fully resourced, they can add capacity to their respective regional areas in the direct delivery of initiatives to address gaps on the policy fringe. Examples of joined up policy can arise from innovative flood prevention schemes where infrastructure enhances public realm for places to dwell, places to play, provision of safe walk and cycling routes, and enhancing biodiversity which could easily be replicated in Scotland.⁷

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

think about... what infrastructure we will need in the future; how we can make better use of existing infrastructure capacity, including through innovation; where transport connections will be needed to support future development; where our international gateways, hubs and links will be in a post-Brexit world; how we can sustain our lifelines; how digital connectivity could change the way we live and work; where our natural resources for energy are; and what emerging and future technologies we will need to plan for.

The different categories of infrastructure all have a role to play with respect to the identified drivers. However, it must be reiterated that good quality transport provision is fundamental to support all of these categories: the built environment of housing; public infrastructure such as education, health, justice and cultural facilities; safety enhancement such as waste management or flood prevention; and public services such as emergency services and resilience. This is because all these categories require people, goods and services to move freely to enable the delivery of their services. Therefore, a balanced approach is required which should reflect the importance of investment in transport infrastructure that delivers low carbon solutions to promote economic growth and the other key overall objectives.

⁷ [Aarhus Surface Water Project](#)

Appendix 2.

ESESCRD Response to NPF4 Call for Ideas Questions with SEStran Amendments

The following extract is from the report "[ESES Regional Response to National Planning Framework 4 "Call for Ideas"](#)". The extract shows ESESCRD answers to the five questions which can be endorsed subject to the SEStran amendments shown in red:

Report approved 6 March 2020.

"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 the National Planning Framework. The ESESCRD ~~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 RTS and~~ 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, ~~along with the RTS~~, 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 ~~is in keeping with the Regional Transport Strategy for the SEStran area. 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, ~~along with the emerging new RTS and STPR2~~ 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 regional partners and operators are** 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.
 - **Recognise** that land use strategies **must support supported by a the regional transport strategy which works to deliver a broad range of outcomes for people and communities**, and does not, **nor will** 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 continue 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 **and public transport** 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 the region could become a victim of its own 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 **partners** 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. 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 **sustainable** tourism is prioritised.

“Question 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 outwith the control of local authorities **and regional partnerships**. **City Partners** in the Region **Deal Partners** recognise the role of the Infrastructure Commission in securing coordination 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 **and Regional Transport Strategies** 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 making community travel 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 **enhance regional** mechanisms to ensure delivery of the necessary infrastructure.
- Support measures 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.

East Lothian Council's NPF4 Call for Ideas – Summary of Key Points for NPF Submission Blindwells/Cockenzie/Climate Change Zone

The following paragraphs are an extract from a Report to East Lothian Council:
Item 07 [Development Planning: National Planning Framework 4/Regional Spatial Strategies and Local Development Plan](#)

Report approved 25 February 2020.

“Summary of Key Points for NPF Submission Blindwells/Cockenzie/Climate Change Zone

For the submission these three proposals will be identified as being of national importance with the possibility of them together being an area of opportunity and co-ordinated action. They provide the opportunity for the progression of influential, innovative and carbon neutral places. The submission will focus on the following points:

- Blindwells new settlement should be identified in NPF4 as being of national importance. It is one of seven key strategic sites within the Edinburgh and South East Scotland City Region Deal. The Scottish Government has committed to help enable the delivery of such sites. The Blindwells Development Area is unique. The ELLDP2018 plans for a future expansion of Blindwells from the 130 hectares BW1 allocated site into the 410 hectare safeguarded BW2 site; this safeguarded expansion land is subject to demonstrable collective landowner willingness to promote a comprehensive solution for the Blindwells Development Area, the satisfactory outcome of ongoing technical work, the formation of a public–private partnership, the development of a viable business case and a comprehensive solution and delivery vehicle that will ensure the delivery and completion of a single new town. There is also scope to consider the innovative deployment of powers within the 2019 Act, such as a Masterplan Consent Area, as well as the potential use of other similar statutory instruments.
- The Blindwells New Town Development Area and former Cockenzie Power Station site, taken together, are 625 hectares, the vast majority of which is previously developed land. This is likely the largest such opportunity in Scotland. Over 30 years, these projects could enable significant new employment and economic development opportunities. They could deliver a substantial quantum of new homes, including affordable homes, as well as a new regional town centre and new infrastructure, including green and blue and low carbon infrastructure.
- The former Cockenzie Power Station site is also unique and requires to be identified of national importance in the NPF. It provides around 70 hectares of land now in public ownership (much of it brownfield). Circumstances have changed in relation to previous ambitions within NPF3 for the delivery of thermal generation and carbon capture and storage here. Although the package of uses for the Cockenzie sites continues to be explored, there will be a focus on

employment, and low and zero carbon energy, and there could be a focus on a port and sustainable construction.

- Within this sub-regional area, there is also scope to consider how the space between these sites and communities offers scope to enable a low carbon place. The proposal for an overall comprehensive approach to this should therefore also be promoted as a nationally important exemplar. This Climate Change Zone proposal would be situated between, and include parts of, the neighbouring regenerating communities and strategic development sites of the former coalfield. It would aim to knit this place together and to balance built development in the area with the enhancement of shared green and blue networks, as well as make provision for other shared grey and low and zero carbon infrastructure, including movement and active travel networks. The proposal would also explore how to address this sub-regional area's challenges by converting them into opportunities and multiple benefits, while promoting a transition to carbon neutral.
- These proposals provide the opportunity for enhancement to the national rail network which would have positive impact both for Scotland and the rest of the United Kingdom. Proposals for four-tracking the east coast main rail line, or for delivering an extension to the High Speed Rail Network to Scotland, which could deliver a new railway station and all-purpose overbridge of the rail line should be included in the NPF.
- The role of East Lothian in providing future growth will also be identified in the response. East Lothian has and will continue to accommodate a large amount of growth over the next decade through sites in its existing LDP. To address current and emerging climate legislation and policy it is important that future growth is sustainable and linked to the vision of a zero carbon new settlement at Blindwells.