

## Members' Library Service Request Form

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**REPORT TO:** Members' Library Service

**DATE:** May 2020

**BY:** Head of Development

**SUBJECT:** Response to National Planning Framework 4 Consultation

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## **1 PURPOSE**

- 1.1 To note East Lothian Councils delegated responses submitted to the Scottish Government's National Planning Framework 4, Call for Ideas consultation.

## **2 RECOMMENDATIONS**

- 2.1 It is recommended that Members note:
- i. East Lothian Council's response to the National Planning Framework 4, Call for Ideas consultation (Appendices 1A & B); and
  - ii. the Edinburgh and South East Scotland City Deal Joint Committee response to the National Planning Framework 4, Call for Ideas consultation. (Appendix 2).

## **3 BACKGROUND**

- 3.1 The Planning Act 2019 sets out a wide range of new planning processes covering both Development Management and Development Planning. While the Planning Act was granted royal assent in 2019 it will be enacted through a series of secondary legislation over the next two years.
- 3.2 The first substantive part of the new Development Plan legislation to be enacted is that which deals with the production of the National Planning Framework. Under the new Act the National Planning Framework will form part of the Development Plan that future Local Development Plans for East Lothian will need to take account of; it will also be a material consideration in determining planning applications.

- 3.3 Members will recall that the Scottish Government has commenced a hugely challenging programme for the production of NPF4. Public engagement has started with a Call for Ideas for which responses are sought. Although the current Coronavirus emergency has brought a delay to the NPF4 programme the timescales still remain challenging.
- 3.4 The Scottish Government is clear that detailed responses are not expected at this stage, and that only initial ideas are to be submitted for consideration by Scottish Ministers. Scottish Ministers will provide for their own publicity and consultation stages for NPF4 as it develops.
- 3.5 East Lothian has submitted two responses to the NPF consultation, an East Lothian response (Appendices 1A & 1B) and a joint one through the City Deal Joint Committee (Appendix 2). The content of these complement each other. The joint response to the NPF was considered by the City Deal Joint Committee in March.
- 3.6 At the Council meeting of the 25 February 2020 it was agreed to delegate authority to the Head of Development and the Cabinet Spokesperson for the Environment for finalisation and approval of the Council's response to the NPF4 Call for Ideas process.
- 3.7 Members were asked to input into an East Lothian response through consideration and comment on the summary of key points set out on the report presented on 25 February 2020. This has now happened.
- 3.8 It was also agreed that both the East Lothian Council and joint responses will be lodged in public within the Members' Library Service once they have been submitted to the Scottish Government.
- 3.9 As previously reported to Council, the South East Scotland local authorities also intend to respond to the NPF4 process through the production of an Indicative Regional Spatial Strategy / Regional Growth Framework that would set out the key strategic direction for the region.
- 3.10 It is intended that this strategy will be completed in the summer of 2020 for submission to the Scottish Government. This strategy will have a wider role than just land use planning and also provide an integrated economic, housing and infrastructure strategy for the region.
- 3.11 This strategy will be prepared and agreed through an amended ESES City Region Deal Structure. This structure will also be used for the development of future regional strategies. The Regional Spatial Strategy will also be brought before Council for approval, prior to submission to the Scottish Government.

## **4 POLICY IMPLICATIONS**

- 4.1 As the NPF will form part of the development plan there will be significant policy implications from its content. However, these responses are the Council's views on the questions in the Call for Ideas consultation. Direct policy impacts will only be discernible through the draft and final NPF.

## **5 INTEGRATED IMPACT ASSESSMENT**

- 5.1 As a response to a consultation the subject of this report does not affect the wellbeing of the community or have a significant impact on equality, the environment or economy.

## **6 RESOURCE IMPLICATIONS**

- 6.1 Financial – none beyond existing officer time. However, with the absence of a regional core team the tasks associated with the development of a Regional Spatial Strategy will have to be accommodated from within existing staff resources.
- 6.2 Personnel – See above.
- 6.3 Other – none.

## **7 BACKGROUND PAPERS**

- 7.1 Planning (Scotland) Act 2019
- 7.2 Town and Country Planning (Development Planning) (Scotland) Regulations 2008
- 7.3 Scottish Planning Policy (SPP)
- 7.4 Scottish Government Planning Series Circular 6/2013: Development Planning
- 7.5 Report to East Lothian Council 25 February 2020 Development Planning: National Planning Framework 4 etc.:  
[file:///C:/Users/edgar/AppData/Local/Packages/Microsoft.MicrosoftEdge\\_8wekyb3d8bbwe/TempState/Downloads/ELC20200225\\_07\\_NPF4\\_RSS\\_and\\_LDP2\\_%20\(1\).pdf](file:///C:/Users/edgar/AppData/Local/Packages/Microsoft.MicrosoftEdge_8wekyb3d8bbwe/TempState/Downloads/ELC20200225_07_NPF4_RSS_and_LDP2_%20(1).pdf)

- Appendix 1A: National Developments Response Form
- Appendix 1B: East Lothian Council Response: The Scottish Government's Call for Ideas on National Planning Framework 4.
- Appendix 2: Edinburgh and South East Scotland Regional Response to NPF4 Call for Ideas

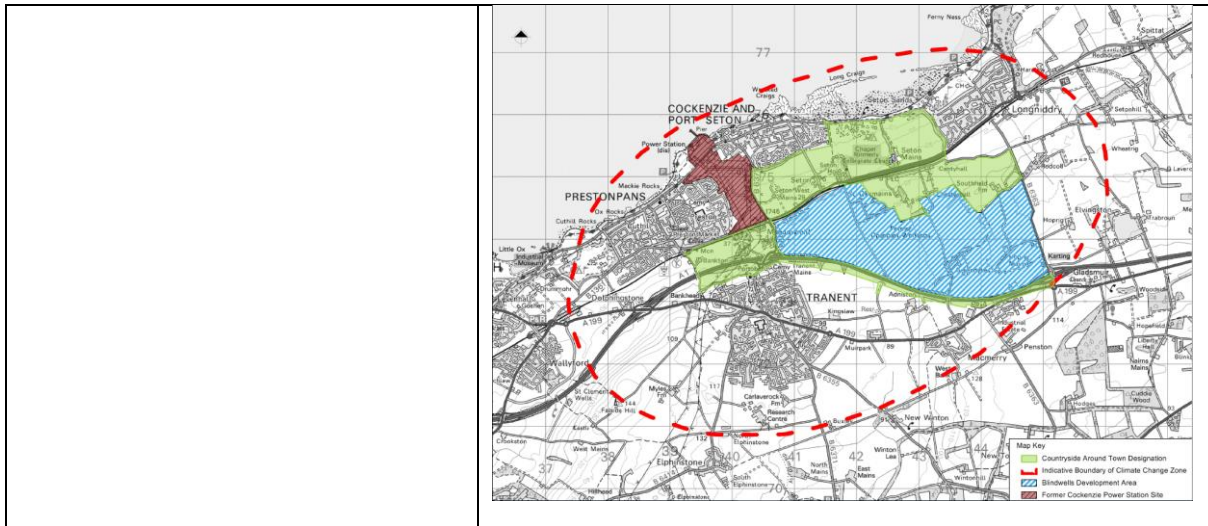
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<b>DATE</b>	28/04/2020



## National Developments – Response Form

Please use the table below to let us know about projects you think may be suitable for national development status. You can also tell us your views on the existing national developments in National Planning Framework 3, referencing their name and number, and providing reasons as to why they should maintain their status. Please use a separate table for each project or development. **Please fill in a [Respondent Information Form](#) and return it with this form to [scotplan@gov.scot](mailto:scotplan@gov.scot).**

Name of proposed national development	“The Blindwells, Cockenzie and Climate Change Zone: An Area of Opportunity & Co-ordinated Action.”
Brief description of proposed national development	<p>This sub-regional area can become an exemplar of how sustainable inclusive growth can enable an innovative and just place-based transition to carbon neutral. The emerging vision for the area is <b><i>‘an influential, innovative, healthy and carbon neutral place that is a vibrant destination and attractor’</i></b>.</p> <p>A full description of this candidate National Development is set out at Annex 1 of East Lothian Council’s full Call for Ideas response. If appropriate, we would welcome on-going engagement with Planning and Architecture Division colleagues as NPF4 and these proposals are developed.</p>
Location of proposed national development (information in a GIS format is welcome if available)	<p>This candidate National Development area would include the settlements of Tranent, Prestronpans, Cockenzie/Port Seton and Longniddry, and the land between them including two strategic development sites, namely the Blindwells Development Area and former Cockenzie Power Station site.</p> <p>The boundaries of the area will be subject to finalisation, including following consideration of the public consultation on the proposals during May and June 2020, but they are shown indicatively below and within the accompanying GIS shape file.</p>



What part or parts of the development requires planning permission or other consent?

Panning permission has been approved for an on-shore interconnector for an off-shore wind project at the former Cockenzie Power Station site. At the Blindwells Development Area 1,600 homes and 10 hectares of employment land has planning permission in principle. The remaining development in this area is at conceptual stage and requires business case development, design development and planning permissions etc.

When would the development be complete or operational?

The full development potential of this sub-regional area is anticipated to come forward over the next 30 years to 2050.

Is the development already formally recognised – for example identified in a development plan, has planning permission, in receipt of funding etc.

Blindwells new settlement is an Edinburgh and South East Scotland City Region Deal project, and the Blindwells Development Area is identified within the East Lothian Local Development Plan 2018 (ELLDP2018), comprising the allocated BW1 site and safeguarded BW2 site. The former Cockenzie Power Station site is identified as a National Development within National Planning Framework 3, and is also currently allocated in accordance with that within the ELLDP2018. The Climate Change Zone proposal is also emerging from a Countryside Around Town policy designation in the ELLDP2018.

The former East Lothian coal field could be one of Scotland’s top-ten locations for low carbon sustainable inclusive growth that enables a just transition to net zero carbon. The Blindwells Development Area and former Cockenzie Power Station site are 625 hectares, most of which is previously developed land.

Within the Blindwells Development Area, the initial 130 hectare phase of the new town is underway; 410 hectares expansion land is safeguarded. There is major potential in business case development and delivery for collaboration, partnership, collective impact and financial innovation to create a sustainable, influential, innovative, healthy, inclusive and carbon neutral place. There could be scope for a

Masterplan Consent area here. The adjacent former Cockenzie Power Station site has unique assets and considerable potential for a wide range of uses focused on employment. There may be a focus on cruise related activity and sustainable construction alongside energy with a pipeline of projects across the region and beyond. Conditions have changed in relation to the delivery of thermal generation and carbon capture and storage here, and we would welcome recognition of this and the wider opportunities within NPF4.

There is significant potential for environmental improvement, regeneration and enterprise in the area in association with development. A Climate Change Zone is proposed between, and includes parts of, the neighbouring communities and sites. It focuses on securing 'place quality and value'<sup>1</sup>, including health and wellbeing, and seeks to narrow the inequality gap. It aims to knit the place together, balance development with enhanced green, blue and active travel networks, and to enable strong resilient communities by drawing on their identity and assets and by addressing challenges and converting them into opportunities and multiple benefits. It proposes a sub-regional water management system to improve the water environment, better manage surface water, ground water and treated mine water and to enable geothermal opportunities, manage flood risk and protect material assets. Overall, the proposal aims to be a catalyst for sustainable inclusive growth and to enhance health and well-being, biodiversity and habitat.

We want to enable this nationally important gateway growth location by integrating with existing and potential enhancements of UK cross border, regional and local connectivity, including digital networks. We can make best use of existing assets, and target investment in new multifunctional low carbon assets. There is significant potential to increase job density and productivity and effectively integrate land use and transport. Collective impact here can deliver investment, enterprise, skills development and training, as well as innovative low carbon projects and delivery. This could create a skilled workforce and new jobs in the low carbon economy.

We want to plan the future of this area collaboratively and synergistically to benefit people, places, the environment, climate and economy. We propose that this area becomes a fresh National Development, and that it is designated as '*An Area of Opportunity & Co-ordinated Action*'.

## Keep In Touch

For more information and other resources



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**East Lothian Council Response:  
The Scottish Government's Call for Ideas on  
National Planning Framework 4.**



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# General Response to Call for Ideas Questions

## Introduction

Thank you for consulting on this initial stage of the process for developing the fourth National Planning Framework. East Lothian Council, through its membership of the Edinburgh and South East Scotland City Region Deal (EESCRD) has already made a joint response to your consultation.

The points raised in the joint submission are reiterated and sometimes elaborated on in this response. Alongside this are comments more specific to East Lothian that also have national relevance, including a proposal for a fresh National Development area and policy issues that have arisen during the implementation of the East Lothian Local Development Plan 2018.

East Lothian welcomes the Scottish Government's commitment to combine the National Planning Framework with Scottish Planning Policy, and to provide national policy that will avoid repetition at the Local Development Plan level. However, it is important that Local Authorities should still be able to include supplementary local policies that reflect their local area as necessary.

It is critical in rethinking planning policy that we ensure connections are made across all relevant policy areas, and major influences on the planning system including; climate, inequality, ecology, housing, health, welfare, education, economy, technology, transport and energy. For example, the future direction of housing policy is changing to a system wide approach. Housing has a vital role to play in meeting many of our aspirations, including eradicating child poverty and homelessness, ending fuel poverty, addressing climate legislation and policy, and promoting inclusive growth.

It is also critical that Planning is aligned with other regimes, including Local Housing Strategies and Health and Social Care Strategic Plans. Planning must be closely linked to Housing to 2040 and the Scottish Government's ambitions for a housing system, based on a human rights approach. To enable this approach, it must also be reflected in planning policy, guidance, decisions and actions.

We also support the proposal to include targets for the use of land in different parts of Scotland for housing at a national level. East Lothian would welcome the opportunity to work with the Scottish Government to identify the targets and distribution at a regional and local authority level. It is important that the National Planning Framework takes the opportunity to develop a new approach to the calculation of required housing delivery as an essential part of its vision for how economic growth should be distributed across Scotland overall. This is not to avoid the need to deliver housing but to allow the planning system to focus on the delivery of high quality development and places rather than get embroiled in resource intensive debate around housing shortfalls.

East Lothian Council is committed to working with the Scottish Government to help address its climate targets through the promotion of sustainable places. However, it is imperative that the policy in the National Planning Framework 4 provides a strong basis for progressing actions to address climate change and the delivery of infrastructure. Both of these are essential to address sustainable movement and design, provide sustainable energy and promote inclusive growth. Without stronger policy in these areas the national climate targets will be difficult to achieve.

Through joint working with the other five South East Scotland Local Authorities an Indicative Regional Spatial Strategy will be developed that will further articulate the spatial elements and main themes raised in this response. For East Lothian, this will include a particular focus on proposals

within East Lothian for our proposal for a fresh National Development area encapsulating our strategic sites at Blindwells and Cockenzie and our ClimatEvolution Zone.

An Annex to this response highlights the opportunities that can be realised through our proposed fresh National Development area. Here, there is an opportunity to genuinely address national climate change targets and to place Scotland as a world leader in developing net zero carbon places. The Annex sets out the significant joint working that has taken place across a multitude of agencies to scope out the project and move it forward in a collaborative way to deliver collective impact.

Clearly the maritime setting off the coast of East Lothian is of increasing national importance for offshore energy generation, and the Council would welcome a national approach through the NPF to addressing the requirements for land based infrastructure to support offshore wind energy. Whilst an approach to this is articulated as an existing National Development within NPF3, circumstances have changed in relation to the former Cockenzie Power Station site in terms of thermal generation and carbon capture and storage there. We would therefore also welcome recognition of this and the wider opportunities and multiple benefits that our fresh National Development proposal could bring.

Another location of national importance in East Lothian is the nuclear facility at Torness, scheduled to close within the lifetime of NPF4 in 2032. It too provides a grid connection, with another grid connection nearby further inland to serve Crystal Rig Wind Farm. These grid connection locations are all identified within the East Lothian Local Development Plan 2018 as part of National Development 3 and the associated area of co-ordinated action. Torness currently has a major role in the country's energy supply, and the Council supports its continued presence and the possibility of its redevelopment, and notes the particular challenges and opportunities that will arise from decommissioning, including its deep water access. However, whatever decision is made on the future of nuclear power it is important to recognise the key role this site plays in the local economy and the need to have a 'just transition' around any changes proposed for the site, considering its deep water harbour at a strategic location at the mouth of the Forth.

The current challenges brought about by Coronavirus may have lasting effects on the economy. While demand for new development will return it is important that in the short term standards in new development are not prejudiced to stimulate growth. The ambitions around climate change, ecology, health and well-being, equality, connectivity, inclusive growth and place making remain.

## Question Responses

In relation to the questions posed as part of the Call for Ideas consultation, East Lothian Council makes the following comments:

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

There needs to be clarity on what 'net zero emissions' means and what we, as local planning authorities, should include when calculating emissions and how this should be done to ensure consistency across all local authorities.

Overall there needs to be much stronger policy to allow local authorities to require developments to contribute to net zero. Current policy only allows local authorities to 'encourage' developers, not 'require'. This will need to be across both Planning and Building Standards legislation so that we can require:

- 'gold standard' or Passivhaus energy efficiency standards for housing

- decentralised energy and heat networks in new development, with provision to extending from and in to existing urban areas where possible
- joined-up district energy or heat networks across different landownership.

Low carbon technologies and networks need to be brought into the mainstream of development. At present they are often seen as being alternative which leads to an understandable reluctance by developers to include the most advanced technology when rival more 'conventional' approaches and sites are available, often at a lower price. It may be that to ensure that low carbon technologies are delivered on site or across wider areas that alongside policy measures subsidies are brought in to help develop this industry and allow their more widespread use.

Masterplanning of district energy and heating networks is important, and statutory powers are required to connect across land not in Council ownership outwith the development site (this may come through the LHEES [Local Heat & Energy Efficiency Strategy – currently under consideration by the Scottish Government] but also relates to the Planning process); eg connect heat network to local community infrastructure such as swimming pools, learning facilities and care homes etc. East Lothian currently has two energy from waste facilities at each end of its district that produce heat which is currently not able to be used locally on an economically viable basis.

The connectivity of new development will be vital in allowing residents to move in a more sustainable manner. For example, efforts to deliver path and cycle networks are often frustrated by landownership and a reluctance by developers to see that outward connections from a site are one of their responsibilities. Local Authorities require stronger more simplified powers, either through a CPO type mechanism or a new approach, to allow land to be assembled for the delivery of sustainable infrastructure. The presence of a route in an adopted Local Development Plan should be sufficient to demonstrate that the land is required to deliver on these sustainable objectives.

There needs to be a stronger presumption / model against designing new residential developments around the private car. If we are to deliver modal shift in transport to active and sustainable travel then we need to encourage this through planning masterplan designs. This will require higher densities and more developer contributions and national funding combining to allow the timely delivery of new or improved infrastructure. This will all require to be delivered with consideration of a just transition and equalities.

Within development sites there requires to be much higher stronger open space / green space standards to require larger and multifunctional areas of 'useful' and better quality green spaces in new developments, plus connecting green networks, that are a better resource for people and for nature. Biodiversity net gain (see <https://cieem.net/i-am/current-projects/biodiversity-net-gain/>) should be brought in for new developments. This is not a replacement for the mitigation hierarchy, which should be retained. This would ensure that biodiversity is better off overall than without the development, and is needed to address ecological issues in the same way that an affordable housing contribution is used to address the need for affordable housing. It would help ensure biodiversity does not lose out when development that is beneficial in other ways has an unavoidable impact on the biodiversity of the site. Biodiversity Net Gain is not financially onerous but would require greater thought in relation to the layout of greenspace and the types of planting provided how the development itself is designed and opportunities for improvements in the surrounding area.

In terms of open space, the minimum 60 sqm is almost always applied by house builders and rarely produces meaningful and sustainable open space. Encouraging more compact higher density residential development at a national level could free up more space for the type of meaningful

open space that can make a much more effective contribution to good place making. At present, the East Lothian Local Development Plan requires a minimum average 30 dwellings per hectare net to be delivered, but even on larger sites where the mix of house types and sizes can be very wide, achieving that density level remains a challenge. It is at this level of residential densities that viable and frequent public transport services begin to become viable.

There should be powers to ensure we can connect up green networks outwith development sites and potentially over land in different ownerships. This again returns to the need for an easier process for land assembly than the current CPO approach and a valuation regime which does not put a burden on the public purse when trying to deliver sustainable solutions (see comments below in relation to Land Compensation (Scotland) Act 1963). At present land is too often valued at housing value, making the delivery of schemes unnecessarily challenging. Where developers could play a part Circular 4/1998 on planning conditions is currently a barrier to this as it restricts actions that can be seen as 'planning gain'.

Opportunities to enforce offsetting of residual carbon emissions through tree planting/woodland creation, and/or peatland, marshland or saltmarsh restoration off-site should be identified. Provision could be made for this off-site, through contributions, in a similar way as is the case for Significant Alternative Natural Green Space (SANGS). This could be linked to tree planting off site or to wetland creation on land previously identified, but not delivered, through mechanisms such as woodland grant schemes. It could also be linked to other biodiversity measures, to induce multiple benefits.

Further consideration needs to be given at the planning stage of whole-life energy costs and emissions of a development, including building materials, end-of-life sustainability and circular economy opportunities, but overall there must be increased support for reusing existing buildings which contain embodied energy rather than demolition and wasting the material resources.

Places must be designed in a manner that can make them more resilient to the long term impacts of climate change. This must be an integral consideration in every new development. Consideration must be given to the appropriate climate change projections for the area and developments designed accordingly. This should include:

- Flood protection measures (ideally incorporating natural flood protection where possible to enhance blue and green networks, eg marshland areas)
- SuDS pond areas should be better integrated into local green networks and should be more beneficial for nature/wildlife (eg wildflower areas to support pollinators; suitable native trees/shrubs) rather than short mown grass slopes as many are at present.
- Coastal protection for coastal sites and infrastructure to take account of sea level rise /storm surges.

The National Planning Framework must also align with Scottish Government's Climate Change Plan that was due to be published in spring of this year.

Although there are challenges with climate change there are also economic opportunities that could help to address existing challenges in the labour market and inequalities. The skills shortage across the construction sector is evident and work is required to ensure the workforce evolves to meet new policy agendas i.e. climate change means different skills are required. Account should be taken of the growth and delivery in different areas and regions. There is an opportunity to be innovative around identifying opportunities for wider collaboration with partners. Technology is also evolving and training programmes are required to ensure that skills evolve to meet new requirements.

There also needs to be a stronger focus on training the workforce who will provide housing support, care and assistance to individuals with multiple and complex needs, including the ageing population. Population balance in East Lothian will be unequal, with a larger older population, a large child population and a smaller working age population. This presents many challenges for the workforce and the county's ability to provide care and support. Again, East Lothian Council supports the JRF recent publication which states that:

*'The Scottish Government must continue to take seriously its commitment on inclusive growth, in every policy intervention, to ensure that the labour market and the economy enable people on a low income to see adequate financial return from their employment'.*

*( E (2019) Poverty in Scotland, Joseph Rowntree Foundation)*

In this context, a real challenge will be to ensure Scotland's existing housing stock is fit for purpose and further guidance and resource is required so that the energy efficiency of our homes is improved through low carbon and renewable heat and energy.

East Lothian has also identified a skills shortage across the county to undertake energy efficiency measures which is particularly apparent in more remote rural areas. This is particularly acute in relation to traditionally constructed properties both rural and urban. Generally the most inefficient properties are also those in disrepair and tackling disrepair must come first.

Retrofitting existing housing stock to better energy efficiency standards, construction of low and zero carbon buildings, installation of district heating networks, new renewables technology and new EV technology, the circular economy, all create economic opportunities and will all require a skilled 'workforce of the future' to reach a Net Zero Scotland.

Modern methods of construction such as sustainable modern methods of offsite construction can offer significant benefits in speed, resilience, cost, quality, environmental performance, reduced carbon emissions and improved Health and Safety. To be successful, this needs scale, a pipeline and skill set which could create new opportunities in the labour market.

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

Quality of life, health and wellbeing for many can be supported by a diverse economy with a wide range of job opportunities and a wide range of house types, sizes and tenures to be delivered within mixed communities.

The NPF may include tenure specific housing targets which are supported by an evidence base of need and demand. Terminologies should also be changed, including a clearer definition of affordable housing, which should not include self-build or mid-market rent as both create confusion and unnecessary debate when dealing with housing delivery. Consideration should also be given to making affordable housing a different use class.

Land use strategies, including the NPF, must place a stronger emphasis on, and not simply encourage, the use of brownfield land before development on greenfield sites is supported, unless a necessary part of the settlement strategy. Although this is a current requirement of all LDPs it is often difficult to enforce as there requires to be a willingness from landowners to bring brownfield land forward. This point reflects the issues raised under other questions which highlight the need to



make best use of existing structures to utilise their embedded energy and reduce loss of greenfield land, particularly that of high quality agricultural value. Mechanisms should be brought in to ensure that viability issues when faced with land contamination or other site issues are not overriding constraints to delivery: this is a recurring theme in terms of delivering more sustainable solutions.

Connectivity will be vital in making places more accessible and easier to move around and between. The land use strategy which emerges from the NPF must be 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. Similar is true in terms of digital connectivity, on the basis that technology can itself change the way we live, work and do business, including in ways that limit the need to travel and reduce emissions, including CO<sup>2</sup>.

Place making will be key to creating communities that can provide context to encourage healthy lifestyles. Our fresh National Development proposal is being promoted as an 'Early Adopter' of Public Health design principles for healthy places, similar to the Health New Towns Demonstrator Sites south of the border. Overall, design and performance must be pushed up the agenda so poor layout, design or response to the landscape context of a proposal become primary reasons for refusing applications. Same should be true in terms of measures to address future climate.

All LDPs currently have policies on design but without a stronger statement through national policy some developers may seek to deliver poor quality layout and design. Additionally, a change to the housing delivery calculation will help ensure better balance on decision-making. This must be supported by strong appeal decisions which see poor design, even in mainstream areas not affected by conservation area designations, as unacceptable. The NPF should encourage higher density housing and a full range and mix of different house types, on larger sites too, in the interests of good place making for the longer term.

Housing, as part of mixed communities, also has a critical role to play in maintaining and supporting sustainable places and creating new vibrant communities. Inequality is invariably reflected, via the housing system, in concentrations of poorer households in relatively poorer neighbourhoods: these households may then experience neighbourhood or area issues that have negative effects on their economic and social wellbeing.

As people live longer, and the ageing population increases, the likelihood of people living with more complex conditions increases. This will require a two-pronged approach to the provision of housing:

- New build housing will be required to be built to wheelchair accessible / housing to varying needs standards. This should not just be for the social rented sector. Where there is a bathroom on the ground floor, the provision of a space to be turned into a bedroom should be considered mandatory. Ability to adapt properties in the future to requirements.
- Requirement to provide a number of specialist housing provision as set out in the Local Housing Strategy. This must involve powers to enforce Private Developers to build for specialist needs. As we strive for equality and equity of service for all people, regardless of disability, we must also ensure they have housing options (which includes a choice in the tenure of their property).

Specialist provision cannot exist in isolation, the communities and provisions around the housing must also reflect an inclusive approach to living. The diverse housing needs of the population and the need to make housing adaptable requires to be addressed through national policy. The same is

true in terms of land uses more widely, as appropriate, and other regimes, such as building standards and transportation will also have important roles to play.

Many of the requirements to make high quality places are also ones that can help address climate change. Green networks, biodiversity, good connectivity and good quality housing all help with the place making agenda and are covered under Question 1 and must be a key part of national policy.

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

Clearly the economic situation will change as a result of the COVID-19 restrictions. In recovery, there are several key actions that will be required to ensure sustainable economic activity at all levels.

National policy must contain a strong vision for achieving balanced growth across Scotland. This includes focussed action for areas which are in need of regeneration, with a strategy for how to direct economic activity to such areas.

Generally spatial planning considerations alongside infrastructure planning at national and regional level must align with national and regional economic ambitions. In the case of the Edinburgh and South East Scotland City Region Deal (ESES CRD), this should reflect the ambition that will be articulated and aligned through the regional response to the NPF4 Call for Ideas, the Interim Regional Spatial Strategy (IRSS) and the Regional Growth Framework.

Positive action needs to be taken to ensure our settlement strategies maintain, enhance and include new destinations and attractors, not dormitory places. The hierarchy and network of settlements should be complemented by the most sustainable strategic, regional and local transport options as appropriate, as is the case with our fresh National Development area proposal at the Blindwells / Cockenzie / ClimateEvolution Zone. In addition to promoting a major area of change and a hub for surrounding communities, this proposal acknowledges the significant capacity within the strategic transport network in the contra-peak hour, meaning existing assets can be utilised to best effect to achieve a more balanced distribution of regional sustainable inclusive growth and to stimulate a higher degree of self-containment and social, economic and environmental growth and regeneration locally. The Annex to this submission sets out further details on the opportunities at this location.

A key theme under all these questions is connectivity (including digital) and this is especially relevant to the movement of people for employment. The current Coronavirus challenges focus attention on improving the country's digital capabilities but there will also remain the need to work related travel. Support measures to increase workforce mobility in the South East of Scotland, especially for residents of disadvantaged communities, primarily through affordable public transport and targeted strategic road interventions, will be required.

National planning and transport policy and strategy requires to focus on the routes where investment in bus priority measures will have the greatest impact on modal shift and supporting more disadvantaged communities. These are interventions that, individually and/or collectively, demonstrably address climate change and reduce carbon emissions. Through national and regional transport planning there needs to be consideration of potential longer-term schemes for tram, light rail and heavy rail, including new rail stations to cater for our cross border networks and growing labour market areas and increasing productivity in our city regions. Regionally and locally, this needs

to be augmented by a requirement through policy for developers to help 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.

Housing also matters to economic development and this should be reflected in the NPF. This is beyond a simple relationship between levels of house building and economic activity. It can enhance economic performance and place competitiveness and must not be seen to take place in isolation from the wider economic context and other measures required to make high quality places.

The Government's housing growth plans present an opportunity to improve the use of housing as an enabler of economic growth. The NPF should encourage all developers to demonstrate how their investment will contribute positively to economic development and regeneration objectives, and social, environmental, ecological and climatic effects.

In high demand areas, public sector funding may be brought forward to take advantage of lower land values, and to encourage an improved and expanded private rented sector to support labour market mobility, which will be key in a recession. In weaker housing markets, focus investment on upgrading existing stock and quality of place improvements, over new supply in the current economic climate.

Climate change will bring economic challenges and opportunities. There needs to be support and encouragement to achieve a just transition to a low carbon economy. Increased employment and improved methods of working can emerge through policy support for low carbon technologies, including energy and heat, low carbon business models and new ways of living and working.

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

For the benefit of residents and visitors Scotland's places need to retain their local character. However, in many instances this has not been happening with the focus being on the volume of delivery rather than quality.

In large part, this issue has been driven by the housing land debate that is mentioned elsewhere in this response. The NPF needs to address this issue and require new development, particularly housing and that proposed in conservation areas to reflect local character, as determined by Local Authorities. It is equally important to provide the setting for new places and establish a policy framework which protects an area's most important environmental assets from development.

National Planning Framework 4 must continue to provide national support for town centres and do what it can to level the economic playing field for town centre businesses in competition with on-line businesses as well as encouraging the repair of town centre property in poor condition.

The character of places could be strengthened in some parts of Scotland through repopulation. However it is important to recognise that areas like East Lothian that are located in close proximity to a large city, experience very different rural pressures from some of those in the north and west of the country. NPF4 should retain the advice that countryside varies across Scotland and some areas, for example those within an hour's drive time of cities, are under significant development pressure and do not need repopulated. In such locations the policy direction should be to ensure the majority

of development is directed to existing or new settlements, and that best use is made of existing buildings as part of an approach that facilitates rural diversification as appropriate to the area.

In East Lothian many of our local places are already planned to expand, and require to be maintained and enhanced. Our development strategy is complemented by measures that facilitate regeneration, delivery of green networks and opportunities to increase access to the countryside, biodiversity and carbon reduction. The indicative Regional Spatial Strategy being prepared by the six local authorities in south east Scotland will reflect this theme by identifying areas of restraint to protect the attributes of East Lothian and to direct development to the most sustainable locations that have greater environmental and infrastructure capacity. NPF4 should recognise these principles as part of its strategy.

One of East Lothian's assets are large areas of prime agricultural land including a good proportion of the very best soils in Scotland. With the need to improve food security and encourage more local production there needs to be greater protection of this resource in national policy that prevents the use of prime land unless required as an essential part of the settlement strategy. At a national scale, it may also be possible to identify a minimum amount of agricultural land that it is desirable to keep available for food production, and to identify the most sustainable locations for this.

One of the strengths of East Lothian is its Historic Environment (made up of monuments, archaeological remains, historic buildings, townscapes and historic landscapes) which form an integral part of the wider landscape of the county, along with the natural environment. Much of the county's tourism is based around this historic environment. In order to keep and enhance the sense of place for East Lothian, and other parts of Scotland, it is essential to continue to ensure that the existing policies in SPP for the Historic Environment are not lessened in the revised NPF4, indeed there is the opportunity to make them more robust and fit for purpose.

Key to achieving this, along with the LDP policies, is PAN 2/2011 which contains important technical details, which the implementation of the Historic Environment policies in East Lothian relies upon. It will be important to retain this document or at least a similar document of similar weight and detail.

This is particularly important, as contrary to the statements in the Ironside Farrar report, HEPS and OPiT are high level documents and lack sufficient technical detail to deal with the majority of the Historic Environment which is impacted upon by the planning regime (in excess of 95% of known remains in Scotland are undesignated). We would suggest that there does require to be a certain degree of flexibility in dealing with the Historic Environment to ensure that the uniqueness of sense of place is retained for each area.

In order to ensure that planning advice relating to the Historic Environment is sound, adequate, proportionate and sustainable it is imperative that reference is made in NPF4 to Planning Authorities continuing to have access to a properly managed HER and to the requisite expertise to properly interrogate, understand and translate the information contained within it.

Scotland's historic national assets also include its 600+ Conservation Areas, 30 of which are in East Lothian. Climate policy may lead to more pressure to relax current controls over development in such areas e.g. to allow solar panels without permission in conservation areas. Without careful consideration this approach would have a detrimental effect on some of the places planning has for so long protected from damaging change and must continue to do so.

Rather than relax control the correct approach would be to develop improved technology that can be delivered without damaging character. Updated advice and guidance on where such technology

can be discreetly located or suitable alternatives, for example within a conservation areas, is the right approach rather than removal of any planning control. Technologies like solar slates or thinner and more suitably coloured solar panels could address both climate change and conservation aims. As many of these technologies are relatively new and sometimes expensive it may be that the industry requires initial subsidy or grants are offered to ensure their usage for an initial period.

Conservation Areas should continue to be lauded and properly managed as the best examples of Scottish townscape that there are and that provide much of the tourism benefit for the country. A similar approach is required for Special Landscape Areas.

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

The planning and delivery of new infrastructure must connect in to the Scottish Government's forthcoming update to Scotland's Climate Change Plan, to ensure that new infrastructure planned helps us to achieve Scotland's Climate Change targets and reach Net Zero carbon emissions.

Infrastructure planning and delivery must also link to the key recommendations of the Infrastructure Commission report and include a priority to make best use of existing assets. However, targeted investment in new infrastructure, particularly in association with transformation and major areas of change, will also be required and we must not lose sight of that either. The approach should ensure that, wherever possible, new assets are multi-functional and deliver multiple benefits for people, place, the environment, climate and the economy.

We must also build in provision for climate change adaptation and resilience to account for future impacts of climate change - e.g. future proofing buildings, rail, active travel and road infrastructure for likely severe weather impacts. The shift to digital infrastructure will also help with both climate change mitigation and adaptation. Lessons should be learned from the Coronavirus restrictions and the ability for people to work remotely and reduce travel. Major investment in digital connectivity should become a key focus to increase the country's resilience. As explained throughout this response, green networks, high density energy efficient buildings, local heat networks, renewable energy (e.g. hydrogen; tidal power; solar; energy and heat from renewable sources and waste), active and sustainable transport, circular economy infrastructure, low carbon business models and technologies, support for the low carbon economy will all also have an important part to play.

Considerable investment in energy and heat infrastructure will be required to meet net zero targets, especially if nuclear power stations are not replaced. Onshore and offshore wind are currently one of the best opportunities to expand production both technologically and viably. However, this technology and the grid infrastructure required to deliver the energy can have considerable impacts on landscapes and communities. Decisions on national grid infrastructure are separated from the planning process, and sometimes the implications of consenting a proposal, or group of proposals, on grid infrastructure is not clear. For example, the current consultation on the Sectoral Marine Plan for Offshore Wind does not include the implications for the onshore infrastructure that would be essential to support the level of development proposed. A national capacity study on where this type of development should and should not come forward should be considered.

The timely delivery of infrastructure will be key to the success of delivering the National Planning Framework. A key to the success of the strategy to deliver actions to address these issues will be connectivity, including digital, and new infrastructure that allows sustainable movement. On new development sites this connecting infrastructure needs to be identified and delivered before the

sites are completed to give the best opportunity for sustainable habits to develop, as set out within our proposal for a fresh National Development area. The NPF should encourage rail investment through East Lothian, full A1 dual carriageway between Edinburgh and Newcastle and support ferry crossings between Fife and the Lothian's including potentially to Cockenzie. The clear alignment of the NPF, including its National Developments, with the Strategic Transport Projects Review and other national infrastructure investment plans is required; currently, development too often facilities infrastructure and not the other way round.

An Action Programme for infrastructure requirements should be developed for each region. This Action Programme must prioritise the delivery of infrastructure having regard to economic impact of providing that infrastructure and the level of growth it would support. Alongside this a funding mechanism or mechanisms must be established to ensure delivery of the necessary infrastructure. This needs to be embedded within the NPF.

Meeting the housing needs of the population should remain a key requirement, and housing land delivery should be calculated on the capacity of effective land or land that could be made effective that is allocated in development plans rather than the pace of on site delivery. The current system does not work as it undermines the LDP and the alignment of growth with planned infrastructure. It removes confidence from politicians and communities that what they are engaging with through the LDP process is what will be delivered. Too often additional sites are approved on appeal based on a simple arithmetical shortfall, a shortfall which the local authority has no control over.

East Lothian will address its housing requirements through the allocation of sufficient effective land but cannot be held accountable for the lack of delivery on sites that have been deemed to be effective through an independent Examination process. The current situation with Coronavirus restrictions and its effects may lead to another decline in house building and under delivery against fixed delivery targets. It is imperative that through NPF4 we move to a system where downturns in delivery, which clearly have no relationship with the availability of suitable housing land, do not lead to shortfalls requiring to be met through additional sites.

There is an urgent need for land reform that allows a proportion of the profit that goes to landowners to be retrieved to deliver infrastructure. Currently the local authorities and developers are left to take too much of the cost of infrastructure delivery. The Scottish Land Commission has investigated this through its Land Lines papers, and land value capture was a point that was considered through Planning Review.

Such measures could be considered further and more widely, and may become particularly relevant if measures to combat climate change are to be delivered at pace and scale. Currently, the Land Compensation (Scotland) Act 1963 Part 2 Section 12 deems compensation to be the value that the landowner might expect through open market sale, not the current use value. This undermines the ability to capture land value uplift for the purposes of delivering infrastructure, including low carbon infrastructure.

# Annex: Our Proposal for a Fresh National Development Area

## Introduction

This Annex sets out our proposal for a fresh National Development Area within East Lothian for inclusion within National Planning Framework 4 (NPF4). It supplements our National Development response and provides background information and reasoning for the benefits of our proposal. This Annex has been prepared by the Council in consultation with and submitted with the support of:

- Hargreaves Services Plc and Taylor Wimpey Plc (also acting on behalf of landowners within the Blindwells Development Area);
- The Key Agencies (many of which note the merits of the proposal, and we understand intend to feedback separately through the Key Agency Group and / or their own responses);
- Public Health Scotland;
- The Improvement Service;
- Scottish Enterprise;
- The Coal Authority;
- South East Scotland Regional Transport Partnership;
- Network Rail;
- Scottish Water; and
- SUStrans.

We are collaborating with a wide range of other agencies and organisations, including Transport Scotland, to develop these proposals, as set out throughout and in the 'Place Principle' section of this submission. If appropriate, we would also welcome on-going engagement with Planning and Architecture Division colleagues as NPF4 and these proposals are being developed.

The submission concludes by suggesting a proposed draft of associated text for National Planning Framework 4 for consideration at this stage, and also with a plan showing the indicative area and boundaries of sites to which the proposed National Development area would apply. These boundaries will be subject to public consultation by East Lothian Council during June and July 2020.

## A Place-based Opportunity of National Significance

The former East Lothian coal field is undergoing significant change and regeneration. This area presents a major opportunity of national significance to become one of Scotland's top-ten locations for low carbon sustainable inclusive growth that enables a just transition to net zero carbon.

Integrating with existing and potential future enhancements of UK cross border connectivity between south east Scotland, north east England and London, we want to enable a new nationally important gateway growth location. Here, there is potential to align plans for a substantial new settlement and the redevelopment of the former Cockenzie Power Station site with such enhanced connectivity and the delivery of a new regional gateway transportation hub.

Within the former East Lothian coal field there is considerable potential for low carbon investment, economic development, job creation, enterprise, innovation, and new housing and infrastructure delivery. We are focused on how the development strategy for this place can be maximised through partnership and collective impact in a collaborative, sustainable and inclusive way. We want to turn our challenges in to opportunities, enable regeneration and create a new vibrant destination and attractor of national significance. This will enable a better balance of regional growth and help stimulate regeneration and sustainable inclusive growth locally.

Our emerging vision for the former coal field is for *'an influential, innovative, healthy and carbon neutral place that is a vibrant destination and attractor'*. The Blindwells Development Area and former Cockenzie Power Station site, taken together, are 625 hectares, the vast majority of which is previously developed land. Over a 30 year period, these strategic projects can enable significant new employment and economic development opportunities, a new regional town centre and a substantial quantum of new homes with a diverse mix for varying needs and a balance of tenure types, including affordable homes and specialist housing etc. Best use can be made of existing assets, and essential new assets can be delivered to secure transformational change, multiple benefits and place based regeneration. This includes the integration of shared green, blue, grey, low and zero carbon, digital and transport infrastructure, as well as multifunctional education, community, healthcare, cultural, leisure and tourism facilities.

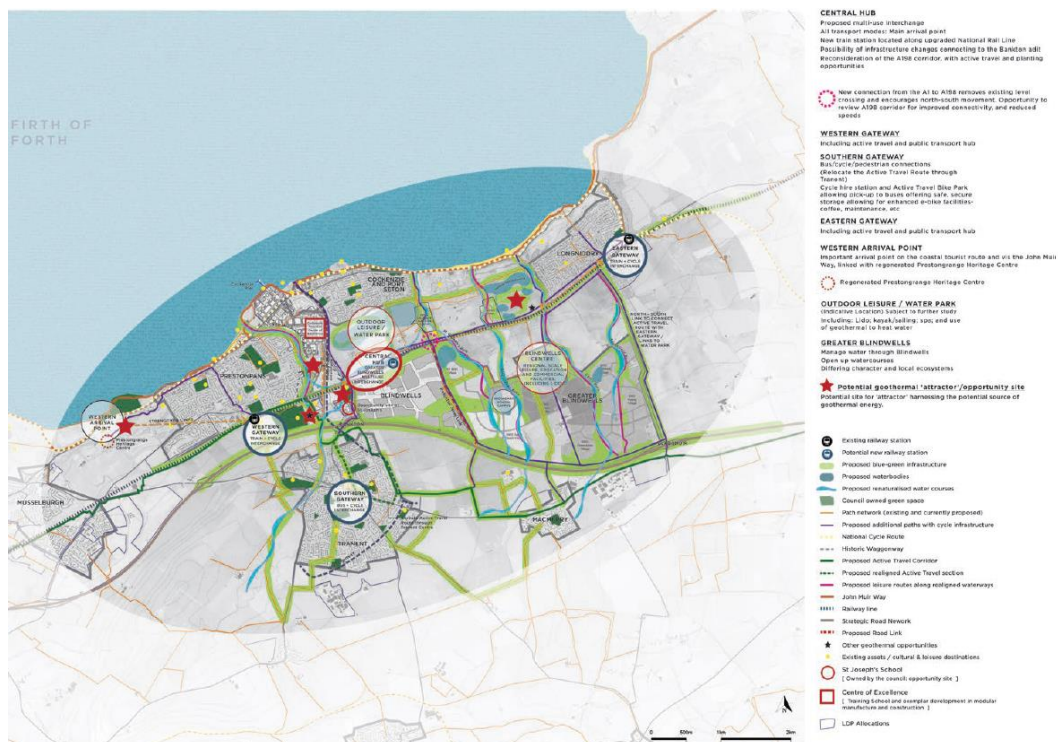


Figure 1: Emerging Strategic Plan for Candidate National Development Area

Blindwells new settlement is an Edinburgh and South East Scotland City Region Deal project. Within the Blindwells Development Area, the initial phase of the new town is underway; the allocation of its safeguarded expansion land is subject to demonstrable collective landowner willingness to promote a single 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 led by East Lothian Council focusing on up-front land remediation and the up-front and early delivery of shared enabling and supporting infrastructure, and a comprehensive solution and delivery vehicle that will ensure the completion of a single new town. There is significant potential here, in the development of the associated business case and delivery of the new town, for collaboration and collective impact as well as financial innovation to enable this long term development opportunity in a sustainable, inclusive, healthy<sup>1</sup> and low carbon way.

The former Cockenzie Power Station site is adjacent to the new town site and it has considerable potential for a wide range of land uses focused on employment. Future opportunities continue to be

<sup>1</sup> Designing for Health & Wellbeing, Greater Blindwells East Lothian, Optimised Environments (2019)



explored, including energy and those that could make best use of water assets and of the geothermal potential in the area. There may also be a focus on cruise related activity and energy alongside sustainable construction with a significant pipeline of projects across the region and beyond, and the new settlement adjacent. Circumstances have changed in relation to previous ambitions for the delivery of thermal generation and carbon capture and storage here, and we would welcome recognition of this and these wider opportunities within NPF4.

A Climate Change Zone proposal is emerging between, and includes parts of, these regenerating communities and sites. It seeks to create a connected sub-regional landscape that balances built development with enhanced green, blue and low and zero carbon networks. It considers how the strategic sites, neighbouring communities and the space between them offers scope to enable a carbon neutral and healthy place. It has a focus on the underlying determinants of 'place quality and value'<sup>2</sup>, including health and wellbeing, which relate to the built and natural environment, to ensure the approach can narrow the inequality gap in the area. It includes potential for a new sub-regional water management system that improves the water environment, better manages surface water, ground water and treated mine water, and enables geothermal opportunities, manages flood risk and protects material assets. It aims to knit this place together with shared multifunctional low carbon infrastructure that creates multiple benefits, and is both a catalyst for as well as an attractive setting for sustainable inclusive growth, job creation, enhanced health and well-being, biodiversity and habitat and on-going regeneration.

Enhanced digital connectivity and decentralised energy and heat networks can be developed within existing regenerating communities and new development sites to change the way we live, work and do business. In particular, the mining legacy provides considerable potential for geothermal energy; maximum use could be made of water assets and through integration with enhanced green, blue and active networks also environmental, biodiversity, health and habitat gains. This could provide further benefits including enterprise that supports a just transition to a net zero carbon economy.

Strategic transportation projects are being considered in the area too. These include potential interventions on the East Coast Main Line railway that could lead to shorter inter-city journey times and an increase in the frequency and capacity of local train services, and to a new regional multi-modal transport hub at the new town. There is scope to improve strategic and local road access, including for public transport, and to significantly enhance active travel. The ClimatEvolution Zone proposals include provision for the creation of sub-regional transport hubs that provide for active travel, electric vehicles and bikes as well as ancillary development. This includes the physical infrastructure for promoting Mobility as a Service (MaaS), with the scope to consider the digital wraparound on a wider regional basis as identified within Transport Scotland's Draft Case for Change for the second Strategic Transport Project Spending Review (STPR2). Creating a new destination and attractor here will also allow existing contra-peak capacity in the transport network and services to be utilised. This could help reduce inequalities and advance equalities in this regeneration area.

The success of this sub-regional area will be directly linked to the ability to enhance strategic and local connectivity to, from and within it. Strategic decisions on the distribution of new mixed use development and targeted transport interventions can be integrated to bring a better balance of sustainable inclusive growth across the region while stimulating inclusive growth and regeneration locally. This can be progressed in parallel with other national, regional and local transport measures that minimise the need to travel and de-carbonise the transport network, including the Programme

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<sup>2</sup> Carmona (2019) Place value: place quality and its impact on health, social, economic and environmental outcomes. *Journal of Urban Design*, 24:1 1-48. (Page 4)

for Government commitment to decarbonise the domestic passenger rail network by 2035, the creation of Low Emissions Zones in Edinburgh and the introduction of Workplace Charging Levies. More local measures could include innovative incentivisation, planning, design and delivery to attract the right development.

These opportunities offer significant potential to promote a new gateway growth location that increases job density and productivity and integrates land use and transport with an innovative zero carbon new settlement within a wider climate change zone that also helps to address inequalities. Collaborative working to maximise the unique opportunities in this place could deliver an innovative and complementary agenda of aligned enterprise, skills development and training programmes and projects, supply chains, products, investments and development. This could lead to the creation of a skilled workforce and the creation of a wide range of new job types that are linked to how we will enable a just transition to net zero carbon while growing key parts of the net zero carbon economy.

In the above context, we consider there is significant national, regional and local benefit in the designation of a fresh National Development area here within the Scottish Government's National Planning Framework 4 (NPF4) that centres on this former coal field area. The purpose of such a designation would be to identify and promote:

- the area as nationally important exemplar of how to enable a just place-based transition to net zero carbon and sustainable inclusive growth over the short, medium and longer term;
- the need to align and co-ordinate the delivery of a package of national, regional and local infrastructure interventions that are required to enable and support this growth, while ensuring the inter-relationships and dependencies between challenges and opportunities are addressed– i.e. that multi-functional shared solutions and multiple benefits are secured; and
- the need for partnership and alignment at national, regional and local level as well as at an organisational and sectoral level to provide collective impact and co-ordinated action and investment to maximise positive outcomes and long term multiple benefits.

Such a fresh National Development designation would recognise this nationally significant opportunity to deliver sustainable inclusive growth that is aligned with climate policy, policy on healthy places and other objectives. This place can become an exemplar of how to turn challenges into opportunities and innovatively transition *'from coal to carbon neutral'*.

We want to consider future delivery in this area collaboratively and synergistically for the benefit of our people, places, the environment, climate and economy. We propose that this area becomes a fresh National Development area in National Planning Framework 4, and that it is designated as *'An Area of Opportunity & Co-ordinated Action'*.

## **A Place-based Vision & Unique Selling Point**

### **An Emerging Vision & Unique Selling Point**

Through early engagement with Scottish Government, Key Agencies and Architecture & Design Scotland, our early focus has been to articulate an emerging Vision and Unique Selling Point (USP) for the area. The emerging Vision and USP are still under development, but at this stage the emerging Vision can be described as:

***"An Influential, Innovative, Healthy and Carbon Neutral Place that is a Vibrant Destination and Attractor"***

**Influential** – bring balance to the city region by adding a well-connected new town and a new economic location of scale and significance that changes perceptions and creates destinations, and becomes an attractor and a resilient economic driver with a national, regional and local influence as a unique place to invest, visit, live, learn, work and play;

**Innovative** – secure innovation in the infrastructure we provide, in the enterprise and businesses we attract, in the buildings we build, in the use of technology, in integrated services and facilities, in education, skills development and training, and in incentivisation, regulation and joined-up solutions, and in planning, design and delivery;

**Healthy** – the NHS ‘Healthy New Town Programme’ should be applied to help the new town become a public health priority ‘early adopter site’ and a ‘healthy’ place to locate by:

- *planning for population and demographic change including tackling obesity, mental health issues, physical inactivity and the needs of an ageing population;*
- *delivering new integrated facilities and services, including digitally, targeted at local issue and preventative action;*
- *growing our reputation for a high quality environment and as a leisure tourism destination, including by delivering a sub-regional ClimatEvolution Zone that enables improved health and wellbeing, and environmental, bio-diversity and habitat gains;*
- *becoming a hub for healthy connected places: community facilities, community growing, active travel, physical activity and wellbeing;*
- *providing compact walkable neighbourhoods and a healthy urban realm;*

**Carbon Neutral** – offer an overall scale, density and mix of land uses, infrastructure and buildings that minimise the need to travel, particularly by private car, and deliver digital connectivity, low and zero carbon technologies, decentralised energy and heat networks, and grid connections.”

The emerging vision is for a high quality place with significant influence and attraction. Existing and new rail, road and active travel interventions could significantly improve the area’s connectivity in a UK, national, regional and local context. Shared multifunctional infrastructure that delivers multiple benefits for communities and sites can be delivered. It can be a high quality, adaptable, carbon neutral, well-connected, desirable and healthy place to invest, visit, live, learn, work and play.

### **An Emerging Monitoring & Evaluation Framework**

The vision statement is supported by a series of emerging priority themes. These are set out in the “flower diagram” below which illustrates how each theme must converge to deliver synergies that will lead to the delivery of a healthy and sustainable place with climate adaptation, mitigation and sequestration measures. Under these themes a series of targeted outcomes, policies, projects and enablers can be developed to deliver the vision by addressing the themes and seeking to maximise the interrelationships and synergies between them.



Figure 2: Emerging “Flower Diagram” Priority Themes

Taken together, these themes and their associated outcomes and actions could provide a place based implementation, monitoring and evaluation framework that describes a route map to delivery and measurable intended success factors at completion, completion + 10 years, completion + 20 years, completion + 30 years – i.e. a route map to deliver outcomes by 2050.

## Place-based Opportunities, Challenges & Development Proposals

The East Lothian coalfield has communities in the lowest 10% SIMD deciles in Scotland, which are in need of on-going social, economic and environmental regeneration. This is mainly due to the decline of industry – e.g. mining, fishing and energy production – and the legacy of landscape change in the area from previous industrial activity, mining operations, infrastructure and other development.

The delivery of major growth projects here must ensure this place is adapted to accommodate and mitigate growth and future climate in a way that makes it more vibrant, inclusive, healthy, resilient and sustainable. This area can become the place in Scotland to pioneer collective impact at significant scale and to deliver an innovative infrastructure led and place-based approach to facilitating the just transition to net zero carbon through sustainable inclusive growth.

The following sections outline how this area’s challenges can be converted in to opportunities for the benefit of people, places, communities, the environment, climate and the economy.

## Water Environment

Water management systems in this sub-regional area have been heavily engineered, and are not playing their part in delivering benefit to people, places, the environment, climate and economy.

A legacy of surface and deep mining has affected the way that water flows across, under and through the area, and so too has the development of the A1, the East Coast Main Line railway and former Cockenzie Power Station site and associated ancillary development. The on-going management of water in this place is a key issue, but also a significant opportunity for the future.

In general, land in the area slopes from south to north and therefore the overland flow paths of surface water and the small watercourses also drain in that direction towards the Firth of Forth. Ground water collects under the surface where it mixes with mine water from the rest of the coal field (that generally flows underground from west to east) and gathers in the former open cast mine void at Blindwells.

The backfilled mine void at Blindwells acts as a basin for mine waters and a geological intrusion to the east – an underground granite dyke - forms a low permeability barrier to groundwater flows following the natural gradient to the east. Some watercourses run dry for much of the year, suggesting surface water and field run-off percolate through previously mined ground or mine workings to the water table, while other watercourses can convey too much water and flood.

Interventions associated with the mining legacy include a mine treatment regime, which exists across the whole coalfield but the treatment plant at Blindwells is where abstraction is at its deepest; mine water here can be pumped at 450 litres per second and is discharged through a treatment system into the Seton and St Germain's Burns to the Firth of Forth. This manages the natural rise and rebound of mine water to a new equilibrium, and also manages the hazards of mine water breakouts at surface (which could contaminate and impact surface watercourses). Were it not for the management of mine water rebound at the treatment plant through this system, the water table in the area would rise to its previous high level and it would inundate the surface. Rerouted watercourses cross the former mine backfill / reinstated land. Former mine shafts and adits may convey surface water run-off into flooded mine workings where it will mix with contaminated mine water and ground waters, thereby oxygenating them and exacerbating their contamination. The effects of climate change may exacerbate this situation.

In terms of infrastructure and other development, strategic linear transport corridors are aligned across the area from east to west and therefore sever the natural north south drainage networks in the area (they have the same effect on local access between neighbouring communities as well as strategic sites). A network of culverts, siphons, pipes and drainage channels route water around, under and take it from the A1 and East Coast Main Line railway; consequently, localised flooding can occur. A combined sewer from Tranent is also routed underneath the road and rail line and so too are other services and utilities networks. The former Cockenzie Power Station site with its associated former coal storage area has a significantly engineered surface water management network; it also provides an inland route for the combined sewer before it connects with the eastern interceptor sewer which follows a coastal alignment to Seafield Waste Water Treatment Works (WWTW).

The inland combined sewer collects surface and foul water from Tranent and other settlements in the area. This is then pumped via the eastern interceptor sewer to Seafield WWTW. This network and treatment works will experience increased demand from climate change and development in its catchment, including on the former Cockenzie Power Station site and the new settlement. Combined sewer overflows have been recorded along the eastern interceptor sewer, particularly during high

rainfall periods. Scottish Water is currently carrying out strategic modelling on its sewer and potable water supply networks to find solutions. The St Joseph's School site is also publicly owned and susceptible to surface water flooding. It is served by a private foul drainage system. A number of private residential properties in the area have septic tanks and these have leaked sewage to surface water culverts. The anticipated effects of climate change may exacerbate these issues too.

Development in the area has taken place incrementally and each phase has sought to engineer or recreate natural networks and systems to control how water is managed and drained. Localised flooding and the management of ground and mine water levels is a particular issue in the coal field, and germane to the development of the new settlement site and its ground improvement; there is a need to ensure ground water levels are managed so existing and future ground stabilisation works at Blindwells are not adversely impacted. The on-going mine water abstraction regime will play its part in this, and watercourses and water bodies at the surface of the new town site will be lined.

Landscape and land use change will be on-going in this area. The initial phase of the new settlement is already underway at site BW1, and there are ambitions to create a larger new town by expanding it significantly onto previously developed land to the east at site BW2 that also requires remediation and stabilisation prior to development. Owing to the nature of land remediation requirements there, the improved ground will be sensitive to inundation – e.g. surface water, groundwater, mine water or grouting - so an appropriate sequence for the delivery of integrated technical solutions that can enable the remediation, drainage, servicing, access and development of the larger new settlement site will be required. There is also a desire to redevelop the former Cockerzie Power Station site to deliver a wider range of uses than currently provided for in National Planning Framework 3. There are a number of other smaller scale development proposals in the area as well.

Taken together, this will likely require an innovative comprehensive water management system for the sub-regional area, to be delivered in phases, that is capable of dealing with future ground water and surface water flow volumes (including abstracted and treated mine water) in a way not limited by development site boundaries. It will need to address the in-combination effects of growth and climate change comprehensively and synergistically while delivering multiple benefits – i.e. not be limited to solutions for individual issues, sites or projects at points in time. This will require a joined up shared solution to be developed and public and private land to be used so that it can be achieved.

The Council is working collaboratively with the Scottish Government, Key Agencies and landowners to find such a sub-regional integrated drainage and water management solution for the future. In this context, plans are emerging for a ClimatEvolution Zone between the strategic development sites and the neighbouring regenerating communities of the coal field. This proposal aims to knit this place together with such shared low carbon infrastructure and to balance built development with enhanced and new green, blue, grey, active travel and low and zero carbon networks and systems.

## **Geothermal Potential**

The Coal Authority view the UK's mining legacy as an asset of strategic importance due to the thermal potential of the heat stored within the mining infrastructure. The East Lothian coalfield is well placed to transition from a legacy of coal production to a county that demonstrates new low carbon energy deployments by utilising the geothermal energy stored within flooded abandoned former coal mines. Mine energy offers consumers a secure low carbon energy supply, stable energy price, improved air quality and new business opportunities whilst delivering economic improvement through the retention of energy spend within the area.

This is a unique opportunity since it is directly linked to this place's history and sense of identity; assets from the past could be used to help reinvigorate this area and to transition it for the future – 'from coal to carbon neutral'. Work in other coal field regions has revealed that the concept of reusing abandoned mines for future energy provision is generally viewed positively by the former mining communities who created the mining infrastructure.

In many places, the management and treatment of rising mine water (consequent of an extended mining legacy) will continue for many years to come. This is the case within East Lothian where naturally rising and rebounding mine water is currently abstracted at 12-15 degrees Celsius, at rates of up to 450 litres per second before being treated and discharged to watercourses near Blindwells. At Blindwells, mine water treatment is undertaken using a reed bed and the heat currently dissipates to the atmosphere before the water is discharged to watercourses.

However, there is potential to harvest this naturally stored heat within flooded mine workings and use it with heat pumps and heat networks to heat around 5,500 homes and public facilities before it is either treated and discharged to watercourses or re-injected to the mine workings to be re-heated through natural geothermal processes over time providing a sustainable source of energy. There may be scope to use mine energy as part of a wider integrated energy system for example by including hydro-electricity, solar thermal, PV or wind energy with potential for thermal energy storage and the provision of cooling. In addition to heating homes, mine energy can also be used to supply heat for municipal buildings, industry or for horticulture projects, the latter presenting opportunities for food security.

The Council is working collaboratively with the Coal Authority, the Scottish Government and Key Agencies on this opportunity as part of the Climate Change Zone work.

### **Natural & Cultural Heritage, including Biodiversity & Habitat**

There is a wide range of natural heritage assets in the area. The Firth of Forth Special Protection Area, Ramsar site and Site of Special Scientific Interest adjoin it. Proposals could seek to improve habitat for relevant bird species, particularly with an enhanced water environment and the inclusion of new wetland features. Another key opportunity is to provide enhanced access to the countryside and greenspaces for recreation, which could help relieve recreational pressure on the coast. Habitat Regulation Appraisal will be necessary to assess effects on relevant sites and species. Other relevant assets include Local Biodiversity sites and fenland and woodland. An Integrated Habitat Network Plan and a Management Plan can be prepared as relevant to this area.

From a landscape point of view, there are several designated Special Landscape Areas (SLA) in and around the coal field: Prestonpans Coast SLA; North Berwick to Seton Sands SLA; Garden County Farmland SLA; Elphinstone Ridge SLA and Winton Walks SLA. A series of Gardens and Designed Landscapes are also present. There are areas of ancient woodland and woodland core areas that are not extensive reflecting the dominant land use as prime agricultural land. There are a wide variety of cultural and historic heritage assets, including the Battle of Prestonpans landscape, Scheduled Monuments, conservation areas, listed buildings and the 'waggon-way' (Scotland's first Mineral Railway) as well as other visitor attractions. There are also historic estates, such as Gosford House.

These natural and cultural heritage assets provide an important reference from which proposals for a connected landscape can emerge. There is also an opportunity here to showcase how low carbon sustainable inclusive growth can protect, conserve and where appropriate enhance natural and cultural heritage assets. They could provide a framework for achieving objectives in relation to

climate change, health and wellbeing and sustainability. The appropriate treatment of these assets in any proposal therefore offers significant benefits in terms of place-making.

### **Strategic Development: New Settlement & Former Cockenzie Power Station Site**

The overall aim for former East Lothian coal field is to create a new destination and attractor and a resilient economic driver for Scotland. This will enable a better balance of regional growth and help stimulate regeneration and inclusive growth locally.

The population of the coal field area could grow to in excess of 60,000 people. There is a need to significantly increase job density above the 0.5 jobs for people of working age that exists here currently. There are ambitions to deliver a new regional town centre a regional multi-modal transport hub at the new town, and to promote a significant scale of employment at the former Cockenzie Power Station site. This would make the area better connected and ensure it can become an attractor and more self-contained and sustainable with provision of more jobs, services and facilities locally.

This approach would also ensure commuting from East Lothian is minimised and an alternative to private vehicles is provided for journeys. Enhanced connectivity would maximise the opportunity to attract employers to locate to the area and make best use of existing capacity in the transport network in the contra-peak hour – i.e. making this place a destination and attractor, rather than a dormitory place. The success of this sub-regional area will be directly linked to the ability to enhance connectivity to, from and within it.

Blindwells new settlement is a unique opportunity. It is one of seven key strategic sites in the Edinburgh and South East Scotland City Region Deal. The Scottish Government has committed to help enable the delivery of this site. The East Lothian Local Development Plan 2018 (ELLDP2018) defines the Blindwells Development Area, comprising sites BW1 and BW2. The ELLDP2018 plans for a future expansion of the allocated 130 hectare BW1 site into the 410 hectare safeguarded BW2 site; the allocation of this safeguarded expansion land is subject to demonstrable collective landowner willingness to promote a single comprehensive solution for the whole Blindwells Development Area, the satisfactory outcome of ongoing technical work, the formation of a public-private partnership, the development of a viable business case led by East Lothian Council focusing on up-front land remediation and the up-front and early delivery of shared enabling and supporting infrastructure, and a comprehensive solution and delivery vehicle that will ensure the completion of a single new town.

The BW1 site has planning permission and the initial phases of the new town development are underway. There may be potential to revisit some of the technical and infrastructure solutions proposed for the BW1 site in parallel with addressing the delivery of the new town expansion. As with the BW1 site, the majority of the BW2 safeguarded land has previously been developed. The land remediation and servicing of the Blindwells Development Area in itself is a significant engineering project of national significance.

Development options for the expansion of the new town are being explored collaboratively with landowners and Key Agencies, but a preferred deliverable option has not been identified yet. As part of this, an acceptable business case addressing the upfront remediation of land and the upfront and early delivery of key enabling and supporting infrastructure, such that a single new settlement can be developed and will be completed, is required. The Council can then prepare a Blindwells Area Design Framework to consult publically on the preferred deliverable comprehensive solution.



The neighbouring former Cockenzie Power Station site is also unique. It provides 90 hectares of land in public ownership (much of it brownfield), the development of which should be considered synergistically with the new settlement. Circumstances have changed in relation to previous ambitions within National Planning Framework 3 for the delivery of thermal generation and carbon capture and storage here. The northern part of this site, where the former power station was located, has advantages in terms of facilitating renewable energy projects that require a grid connection as well as any cruise related activity or uses that would require or benefit from access to the foreshore. There are also ambitions to deliver a wider range of uses across the site that would further inclusive growth opportunities on this site and for the wider area than the more limited range of uses provided for by NPF3.

The Council has explored high level development options for the Cockenzie site, including with local communities, in the development of the Cockenzie Masterplan. These acknowledge the existence of the grid connection and include a focus on employment related uses. Future opportunities continue to be explored, including energy and those that could make best use of water assets and geothermal potential in the area. Technical work is also on-going in relation to cruise related activity and there is scope to consider other energy and mixed use development of national significance too, perhaps linked to wider regional collaboration either through the Edinburgh and South East City Region Deal (e.g. a Skills and Sustainable Construction Innovation Facility) or beyond that Deal. Although uses for the Cockenzie site continue to be explored, we would like to focus on employment generating uses to increase job density and help reduce the inequality gap in the area.

As part of business case development, there is considerable potential for financial innovation as well as innovation in terms of incentivisation, planning design and delivery to attract investment and accelerate delivery of beneficial development on these sites. For example, to accelerate high quality delivery, there is scope to consider a Masterplan Consent Area or similar instruments. These sites present a major opportunity of national significance to become one of Scotland's top-ten locations for low carbon sustainable inclusive growth that enables a just transition to net zero carbon.

The Council is collaborating with Key Agencies and landowners to maximise collective impact and to develop a shared vision for the future of these sites.

### **Emerging Infrastructure Proposals & Projects**

The Blindwells Development Area and former Cockenzie Power Station site are adjoined by UK cross-border rail and road networks that connect Edinburgh and London. Network Rail is also exploring enhancement of these assets in its Scotland East to England Connectivity (SETEC) study. Integrating enhancement of UK cross-border connectivity with the delivery of the Blindwells Development Area and former Cockenzie Power Station site would make the area more attractive as a gateway investment location to international markets, UK markets (including north east England), and Scottish and regional markets; high speed digital networks run parallel to these cross border routes. Together these would enable this area to become a nationally significant destination and attractor.

There are potential emerging national plans and opportunities to enhance the cross-border transport networks at key locations adjacent to these strategic sites, which may progress through Transport Scotland's second Strategic Transport Projects Review (STPR2). Such interventions on the East Coast Main Line railway could deliver shorter inter-city journey times and increase the frequency and capacity of local train services. They may enable the delivery of a new rail station and overbridge of the railway line adjacent to the new settlement. The East Lothian Local Development Plan 2018 (ELDP2018) identifies these opportunities and land safeguards for them based on

information at the time, which we understand has been updated by Transport Scotland and Network Rail since adoption. There may be potential to better connect such a transport hub to communities in the wider area and to road based public transport options, as well as enhance shared access to the strategic sites, by delivering a new A1 interchange; it could also enable longer term growth opportunities through access solutions that could help improve air quality and enable environmental improvement in Tranent town centre. The Council plans to deliver a Strategic Active Travel Corridor (SATC) through the area as identified by the ELDP2018. The initial phases of this are underway, with feasibility being developed so sections between the coal field and regional core can be delivered.

New strategic development and targeted transport interventions can be progressed in parallel with and complement other national, regional and local transport measures that seek to minimise the need to travel and de-carbonise the transport network, including the Programme for Government commitment to decarbonise the domestic passenger rail network by 2035, the creation of Low Emissions Zones in Edinburgh and the introduction of Workplace Charging Levies. Taken together, this could help reduce inequalities and advance equalities in this regeneration area.

In the context of the Draft National Transport Strategy and emerging Strategic Transport Projects Review 2, the Council is in the process of preparing a Strategic Transport Appraisal Guidance (STAG) study to identify how interventions, particularly to the strategic transport network, can support our ambitions. This Case for Change is demonstrated with a commitment from the Council, Transport Scotland and the Scottish Government to progress STAG Part 1 and 2. Extensive consultation has and will continue to be carried out in the development of this work, including with local communities.

There is also a need for enhanced sub-regional connectivity for the communities and sites of the former coal field. The expanded new settlement at Blindwells could become a hub for this area as well as a significant national, regional and local economic driver. The nature, number and type of journeys and movement patterns to, from and across the area will change significantly in future as it transforms, adapts and develops. National, regional, sub-regional and local connectivity must be integrated and enhanced to accommodate these changes. To this end, the Council in collaboration with Transport Scotland is commissioning an Integrated Multi-modal Sustainable Movement Masterplan that will aim to address these issues, in combination with the STAG study. This work will also identify the physical infrastructure for promoting public transport use and Mobility as a Service (MaaS), with the scope to consider the digital wraparound on a wider regional basis as identified in Transport Scotland's Draft Case for Change for Strategic Transport Project Spending Review 2.

The delivery of this new transport infrastructure must, where it can, provide for the delivery of a multi-functional asset base that will knit this place together in an efficient, effective, innovative and sustainable way. The STAG work and the Integrated Multi-modal Sustainable Movement Masterplan are therefore being developed in parallel with and as part of the Climate Change Zone work to ensure that the integration of land use, transport, and green, blue, grey and low and zero carbon infrastructure is planned for properly from the outset. The Council is working with Scottish Government, Key Agencies, Network Rail, SEStran, SUStran and landowners to secure this objective.

Such co-ordinated infrastructure and development planning will require collective impact to enable this area and these strategic sites to become more vibrant, inclusive, resilient and sustainable so they can become a significant focus for Scotland's future economic success. Overall, this could help change perceptions, create destinations and enable a new sustainable inclusive growth location in a former coal field adjacent to Scotland's capital city. The associated potential connectivity and utilities infrastructure enhancements of particular note in this sub-regional area currently include:

- Network Rail is exploring options to increase capacity on the East Coast Mainline which may include four tracking some sections, or an extension to the High Speed Rail Network to Scotland, which may also deliver a new railway station and all-purpose overbridge of the rail line between the new town and former Cockenzie Power Station site;
- a new trunk road interchange at the new town, which could be connected to a new rail station and overbridge via a link road through the new settlement, which could also replace the current level crossing at St Germain's. These interventions could provide a new regional public transport hub and the basis for a sub-regional sustainable access strategy and multi-modal movement framework for this area. This could include a package of interventions at existing stations, including increased capacity for vehicle and bike parking and active travel provision and for MaaS. This would provide shared access for neighbouring regenerating and expanding communities and strategic development sites, including the former Cockenzie Power Station site and beyond;
- the Cockenzie site has frontage to the Firth of Forth as well as a jetty. This site also offers a connection to the national grid. There are currently plans to use part of the Cockenzie site to enable off-shore renewable energy projects;
- high-speed digital networks exist in the area and can be utilised, and there is scope for decentralised heat and energy networks to develop as well as opportunities for associated innovation, investment and enterprise;

Taken together these strategic interventions could unlock the Blindwells Development Area and former Cockenzie Power Station site for development in the national interest, and deliver multiple social, economic, climatic and environmental benefits, for which developer contributions would be sought as appropriate. Such strategic infrastructure interventions could provide the basis to deliver synergistic benefits, such as providing for integrated drainage and water management systems, and to deliver active travel, utilities, energy and heat networks over or under such transport corridors.

The Council has progressed initial technical work on the delivery of education, community and healthcare assets and facilities, and whilst transportation and education infrastructure solutions will be key drivers, the final overall solution will need to be based on the conclusion of technical work that reveals how it will be possible to access, remediate and deliver these sites and their shared infrastructure. This includes the phasing pattern for land remediation, servicing and development, and the rate at which different types of development can occur across the area.

Importantly, such a scale of growth provides a unique opportunity to modernise, adapt and transform the infrastructure and asset base of the area, and to attract new infrastructure of regional and national importance. As plans for these strategic sites become clearer, including any national policy ambitions in respect of them, associated technical work can be concluded.

### **Emerging ClimatEvolution Zone Vision & Action Programme**

The ClimatEvolution Zone proposal draws the proposals for the area together. It is situated between, and includes parts of, the neighbouring regenerating communities and strategic development sites of the former coal field. The proposal explores how to address this sub-regional area's challenges by converting them into opportunities and multiple benefits while helping to address inequalities.

The ClimatEvolution Zone considers how the strategic sites, neighbouring communities and the space between them offers scope to enable a carbon neutral and healthy place. It has a focus on the

underlying determinants of ‘place quality and value<sup>3</sup>’, including health and wellbeing, which relate to the built and natural environment, to ensure the approach can help narrow the inequality gap in the area. Public consultation to stimulate discussion on this emerging vision and strategy is imminent.

The ClimatEvolution Zone proposal aims to knit this place together and to balance built development in the area with the enhancement of shared green and blue networks. It seeks to make provision for shared grey and low and zero carbon infrastructure, including movement and active travel networks. The proposal includes provision for the creation of sub-regional transport hubs that provide electric vehicles and bikes as well as ancillary development. These also provide scope for promoting Mobility as a Service (MaaS) as part of a wider regional opportunity. There is scope to reinstate watercourses and create new water bodies and to consider innovative future uses for water assets, including to develop decentralised energy and heat networks and for heat or energy storage or for cooling. There is considerable potential to enable environmental improvement on the new town and Cockenzie sites and in the wider area as part of and in association with development.

The delivery of a catchment based sub-regional integrated drainage and water management network is a particular opportunity. It could enable the removal of surface water from the combined sewer, and help to address localised flooding as well as the management of ground and mine water, which is germane to the development of the new settlement and its ground improvement. There are also opportunities to link existing and planned residential and business areas to the generation of heat or energy from geothermal sources or from sewer networks (e.g. to combat fuel poverty) or for hydro power (e.g. from abstracted mine water or new watercourses) or for heat storage or for cooling. This could enhance the ability to attract and deliver innovative low carbon enterprise to the area that can make use of renewable heat and energy and the significant volume of water. Water management is therefore a key and complex issue here, but also a significant opportunity for the future.

There is scope to create inland water bodies for outdoor learning and leisure tourism, or to use such water for agriculture, horticulture or for food and drink production. There is potential to use water assets to support innovative low carbon industrial and business processes, which can be linked to education, skills development and employment programmes and job creation. The ClimatEvolution Zone proposal provides scope to protect, conserve, and where appropriate enhance natural and cultural heritage assets. It offers scope to improve green and blue network connectivity as well as biodiversity and habitat and health and well-being. It could also help manage flood risk and protect material assets (including the management of mine water rebound impacting ground improvement at Blindwells). The ClimatEvolution Zone will help create an attractive setting for investment and job creation and for the on-going regeneration of communities and delivery of strategic sites.

Overall, the integrated and shared provision of new hard and soft, green, blue, grey and low and zero carbon infrastructure here could contribute to this place becoming a ‘destination, attractor and resilient economic driver’ for Scotland, for the city region and for East Lothian. The proposal for an overall comprehensive approach to this is therefore promoted as a nationally important place-based exemplar of how an area’s challenges can be converted into opportunities.

### **Linking the Proposals to Education, Training, Enterprise & Skills Development**

The Council is considering the future of the area and sites synergistically for the benefit of people, places, the environment, climate and economy. Given the unique assets and opportunities here

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<sup>3</sup> Carmona (2019) Place value: place quality and its impact on health, social, economic and environmental outcomes. *Journal of Urban Design*, 24:1 1-48. (Page 4)

there is potential to attract and develop new markets, innovative industries and businesses, and to encourage investors and developers to create new jobs and assets in an inclusive sustainable way.

The Council's approved Climate Change Strategy (21<sup>st</sup> January 2020) sets out seven outcomes each with priority actions and an action programme to enable transformative change. A wide range of adaptation, mitigation and sequestration measures are set out. The aspiration for Blindwells is to create an exemplar net zero carbon new town for the future, including by utilising geothermal heat, and that it becomes a centre of excellence in training the workforce of Scotland's low carbon future. The strategy notes similar potential at the former Cockenzie Power Station site.

This agenda can be supported by creating close links to education, skills development and training programmes that could lead to apprenticeships and jobs within the low carbon sector, including innovative methods of low carbon energy production - e.g. geothermal heat and energy. A facilities management training facility (STEAM Plaza) will be delivered nearby at Wallyford Secondary School. There may also be scope to consider an innovative sustainable modern methods of construction facility at the former Cockenzie Power Station site with a considerable pipeline of projects across the region, and a new settlement adjacent. These opportunities could be linked to the Integrated Regional Employability and Skills programme within the Edinburgh and South East Scotland City Region Deal, particularly the Housing and Construction Innovation targeted skills gateway.

There is also scope to create or develop education, skills development and training programmes focused around water (potentially warm) based outdoor learning, leisure and tourism. The same is true in terms of low carbon agriculture and horticulture practices with some of the finest agricultural land available in Scotland here together with considerable sunshine hours and water for irrigation and heat – e.g. glasshouses/hydroponics. East Lothian's Food & Drink Business Improvement District and the Council's plan to develop an Edinburgh Innovation Park with Queen Margaret University also seeks to innovate around Food & Drink practices and products, including the practice of translational medicine that seeks to impart medicines in food products to address acute medical conditions. In association with this area's particular assets and opportunities, there could also be scope for hospitality and management training as well as gastronomy and brewing etc.

Collaborative working to maximise the unique opportunities arising in this area, including from geothermal energy and sustainable management of water assets, could complement and deliver an innovative delivery agenda of growth related programmes, projects, supply chains and products, investment and development. This could lead to the creation of a skilled workforce aligned with a wide range of new job types, including those that are linked to how we will enable a just transition to net zero carbon and grow key parts of the low carbon economy, and help to address inequalities.

This approach would underpin and reinforce the emerging Vision and Unique Selling Point for this place. The Council is working with Scottish Enterprise and other Key Agencies to explore related opportunities, potential investment and education and skills development opportunities.

## **Following the Place Principle for Collective Impact & Delivery**

### **Collaboration, Partnerships & Collective Impact**

In terms of the Edinburgh and South East Scotland City Region Deal, the Regional Partners include the UK and Scottish Governments, as well as the six Local Authorities, the Regional Enterprise Council and Higher and Further Education institutions. The Deal themes are embedded within this fresh National Development proposal.

The Regional Housing Board and Regional Transport Appraisal Board have representation from a range of stakeholders, including Scottish Government, Scottish Futures Trust, Scottish Enterprise, Transport Scotland and the South East Scotland Regional Transport Partnership. The Deal framework provides for business case development and approval for submission to both governments.

In terms of collaborative working on transport technical work, Transport Scotland, Network Rail, rail and bus operators, SEStran and SUStran as well as neighbouring local authority areas are all engaged in the development of STAG work at national, regional and local level as well as the Multi-modal Sustainable Movement Masterplan. Transport Scotland and East Lothian Council are funding the development of these studies.

The Council is a member of the Lothian Drainage Partnership which comprises Scottish Government, Scottish Water, Scottish Environment Protection Agency and local authorities across the region. This partnership is to work to find innovative and effective ways to plan for future growth and climate, and to tackle rainwater, flood risk and growth that will impact the areas infrastructure. It is a key part of delivering on the blue-green cities vision set out in the Programme for Government.

This potential fresh National Development area has been identified by the Lothian Drainage Partnership as one of two potential regional pilot exemplar areas for water management (in this case a largely greenfield one that can enable brownfield redevelopment and retrofit within existing communities). The Lothian Drainage Partnership is contributing resources to help carry out technical work along with the other Key Agencies including Scottish Natural Heritage and the Council.

The Coal Authority has pointed out that considerable geothermal potential exists in East Lothian's former coal field. Here, it is particularly interested in the proximity of the geothermal resource to substantial existing and planned heat users and the scope to explore a blended new build and retrofit pilot scheme. The Council is exploring how such technical work can be progressed with the Coal Authority in tandem with the Lothian Drainage Partnership.

Scottish Enterprise has been involved in the planning and delivery of geothermal schemes, and has awareness of markets, industries, investors and businesses that could make innovative use of such facilities and technologies, including for agriculture, food and drink and horticulture. These are important economic activities underpinning the coal field's past and present economic traditions. The Council is working with Scottish Enterprise to explore related opportunities.

The Council has progressed initial technical work in respect of education, transportation, community and healthcare facilities and infrastructure. Final solutions will need to be based on the conclusion of technical work that reveals how it will be possible to deliver these sites. This includes the physical phasing for their remediation, servicing and development, and the rate of development of different types that can occur. Once the approach to this becomes clearer, including the national policy ambition for the sites, it will be possible to develop the solution for what, how, where and when service, facilities and infrastructure can be delivered in the area by who.

NHS Lothian, Public Health Scotland, the Improvement Service and the East Lothian Health and Social Care Partnership Integrated Joint Board has been, and will continue to be, consulted on these proposals. They are supportive of the emerging Vision and Unique Selling point, including the Healthy New Town 'Early Adopter' programme at Blindwells to put health and wellbeing at the heart of the solution. In terms of establishing future service needs, these organisations will be able to establish this once more information on how the sites can be delivered becomes available.

The Council is currently working in an informal partnership with the landowners within the Blindwells Development Area. They are in the process of concluding land assembly and establishing a formal basis for partnership working. Technical work is also being carried out. At the appropriate time, the public sector could seek to enter into a formal partnership with them to provide support and to ensure that a single high quality new settlement will be created and to deliver on the high quality outcomes envisioned, including the delivery of shared infrastructure and multiple benefits.

In general, the Council is working with a wide range of service and infrastructure providers and regulators to identify new ways of delivering and integrating green, blue, grey, active travel and low and zero carbon infrastructure to enable development, regeneration and address future climate. This includes the development of sound technical work, viable business cases and delivery vehicles that ensure once development in the area starts it will complete and deliver high quality outcomes.

The initial stages of Strategic Environmental Assessment have been progressed with Consultation Authorities in relation to the new larger new settlement and ClimatEvolution Zone proposals; such work can be progressed, including in relation to the former Cockenzie Power Station site, once the NPF4 policy position becomes clearer.

Architecture & Design Scotland has provided pre-design advice to help shape-up the Vision and Unique Selling Point for the area. It has offered on-going support in relation to these proposals, and the application of the Place Principle, as they are developed.

### **Landownership in the Area: Public & Private Sector**

The Council owns a considerable amount of public land and property within the former coal field, including the former Cockenzie Power Station site as well as the former St Joseph's School site. The Council also owns or controls the following assets within the area (generally from south to north):

- land to the south of the A1 at Tranent, including Tranent Huegh, land either side of Church Street south of the A1 and an underpass of the A1 leading to Meadowmill Lane;
- land and property at Meadowmill Sports Centre to the north of the A1, including an extensive area of tree / scrub planting adjacent to an extensive area of car parking;
- the former St Joseph's School site with associated green space, with connectivity to Meadowmill Lane, and adjacent to the A198 and BW1 site;
- the former Cockenzie Power Station site, a considerable part of which is not identified for built development within the associated masterplan proposal prepared by the Council;
- the Bankton Adit culvert, a contaminated culverted but dry watercourse (due to the dewatering regime at Blindwells), which originates at Meadowmill and is aligned north underneath the East Coast Main Line railway through the Cockenzie site to the Firth of Forth;
- a range of public sector housing stock and education and community facilities; and
- the adopted local road network and associated roadside drainage;

The Council operates a wide range of public education and community facilities, some of which are subject to PPP contracts or operated by other arm's length organisations. There is a sizable Council housing stock and a new build housing programme planned to be delivered by the Council or Registered Social Landlords. The Council has an on-going programme of public asset management, adaptation and renewal in place.

Scottish Minister's and Key Agencies and other stakeholders own or control other public land and assets in the area, including:

- Transport Scotland: the A1 and associated assets and land, road side drainage ditches, culverts, siphons and attenuation basins;
- Network Rail: the East Coast Main Line and associated assets and land, drainage ditches, culverts and siphons;
- Scottish Water: public sewer and water supply network;
- Coal Authority: mine water abstraction and treatment facility.

Other relevant private landowners in the area at this stage include:

- Landowners of the new settlement site at Blindwells (BW1 and BW2), with associated land drainage and attenuation basin proposals (and potential for emerging linked proposals);
- The owner of the former Meadowmill Golf Driving Range;
- Land to the south of Cockenzie and west of Longniddry; and
- The former site of the Karting Outdoor Centre by Gladmuir.

## A Fresh National Development Area

### An Area of Opportunity & Co-ordinated Action

This sub-regional area will become an exemplar of how sustainable inclusive growth can enable an innovative and just place-based transition to carbon neutral. The emerging vision for the area is *'an influential, innovative, healthy and carbon neutral place that is a vibrant destination and attractor'*.

The Blindwells Development Area and former Cockenzie Power Station site, taken together, are 625 hectares, the vast majority of which is previously developed land. Blindwells new settlement is an Edinburgh and South East Scotland City Region Deal project, and the remediation and servicing of the Blindwells Development Area alone is a project of national significance. Over the next 30 years, these projects could deliver a significant new gateway location for economic development and job creation, including a regional transport hub, a substantial quantum of new homes with a diverse mix for varying needs and a balance of tenure types, including affordable homes and specialist housing, and a new regional town centre. New green, blue, grey, active travel, low carbon and digital infrastructure as well as multifunctional education, community, healthcare, cultural, leisure and tourism facilities will be required. This will enable the area to become more self-contained and inclusive and minimise the need and distances that need be travelled, thus associated CO<sup>2</sup> emissions.

Strategic infrastructure projects are planned and are being considered in the area. Network Rail is exploring options to increase capacity on the East Coast Mainline which may include four tracking some sections, or an extension of the High Speed Rail network to Scotland. These interventions could improve inter-city journey times and the frequency and capacity of local train services. They may also enable a new railway station and an all-purpose overbridge of the rail line between the new town and former Cockenzie Power Station site to be delivered. Taken together with a potential new A1 Interchange and link road through the new town site, they could also provide the basis for a new shared access strategy for the area, including a multi-modal regional public transport hub and an active travel network, which could provide the physical infrastructure to support Mobility as a Service in this area. Creating a new destination and attractor here will allow existing contra-peak capacity in the transport network and services to be utilised. Enhanced digital connectivity shall also be delivered within existing communities and strategic development sites.

Within this sub-regional area, there is a need to identify how shared green, blue, grey and low and zero carbon infrastructure will be integrated to deliver more sustainable multifunctional assets that



deliver multiple benefits and help to address inequalities. The mining legacy provides considerable potential for geothermal energy as well as environmental, biodiversity and habitat improvement. Sustainable use of water assets must be maximised through enhanced green, blue and active networks, and to improve health and well-being. Strategic infrastructure interventions will provide the basis to deliver synergistic benefits, such as providing for integrated drainage and water management systems and to deliver active travel, utilities and energy and heat networks over or under strategic transport corridors. This integrated approach will create an enhanced setting for inclusive growth and a unique context to enable low carbon investment, innovation, enterprise and employment. It will also offer a foundation for education, skills development and training and the creation of new jobs, including those that will enable a just transition to net zero carbon.

Co-ordinated action, collaborative working, partnership and collective impact across Key Agencies, East Lothian Council, landowners and other organisations and sectors will be required to convert challenges in to opportunities, narrow the inequality gap and to deliver an appropriate sequence of high quality delivery and outcomes. There is potential for Scottish Government and / or UK Government support, including innovative funding and financial mechanisms to enable this, if justified through an evidence based and collaborative business case development processes led by East Lothian Council. To accelerate and support high quality delivery, there is scope to consider deployment of a Masterplan Consent Area or other similar statutory instruments.

Future development proposals in this National Development Area must be planned comprehensively and deliver multiple benefits for people, places, the environment, climate and economy. The key considerations in relation to the future planning of this area are:

- Within the Blindwells Development Area, the initial phase of the new town is underway; the allocation of its safeguarded expansion land is subject to demonstrable collective landowner willingness to promote a single 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 led by East Lothian Council focusing on up-front land remediation and the up-front and early delivery of shared enabling and supporting infrastructure, and a comprehensive solution and delivery vehicle that will ensure the completion of a single new town. This may require amendment to the delivery strategy for the current allocation BW1;
- The former Cockenzie Power Station site has considerable potential for a wide range of land uses focused on employment. There could be potential for developments that require a grid connection, that make best use of water assets and of the geothermal potential in the area as well as low and zero carbon energy and technology. There may also be potential for cruise related activity and sustainable construction. The northern part of the site, where the former power station was once located, has advantages in terms of facilitating projects that require a grid connection or would benefit from frontage to the Firth of Forth. There is also open space to the north, west and south of the site that should be enhanced to improve blue and green networks, habitat and biodiversity and the setting of cultural heritage assets while providing opportunities to enhance health and well-being in the area. To the east the former coal store has potential to accommodate a wide variety of land uses. The site also benefits from a rail spur and access to the strategic transport network;
- The Climate Change Zone proposal emerging between these regenerating communities and sites shall include parts of them and the adjoining countryside. It identifies how the strategic sites, neighbouring communities and the space between them offers scope to enable a carbon neutral

and healthy place. It has a focus on the underlying determinants of ‘place quality and value’, including health and wellbeing, which relate to the built and natural environment, to ensure the approach can narrow the inequality gap in the area. This proposal will create a connected sub-regional landscape that balances built development with enhanced and shared green, blue, grey, and low and zero carbon and active travel networks. It aims to knit the place together and to enable strong resilient communities by addressing challenges and converting them into opportunities and multiple benefits. It will be a catalyst and attractive setting for inclusive growth. It will include a new shared sub-regional water management system that improves the water environment, and better manages surface water, ground water and treated mine water, enables geothermal opportunities, and helps to manage flood risk and protect material assets.

The plan below shows the indicative area and boundaries of sites to which the candidate National Development designation would apply. These boundaries will be subject to finalisation, including following consideration of the public consultation on the proposals during June and July 2020, but they are shown indicatively below and within the accompanying GIS shape file. We would welcome on-going engagement with Planning and Architecture Division colleagues as NPF4 and these proposals are developed.

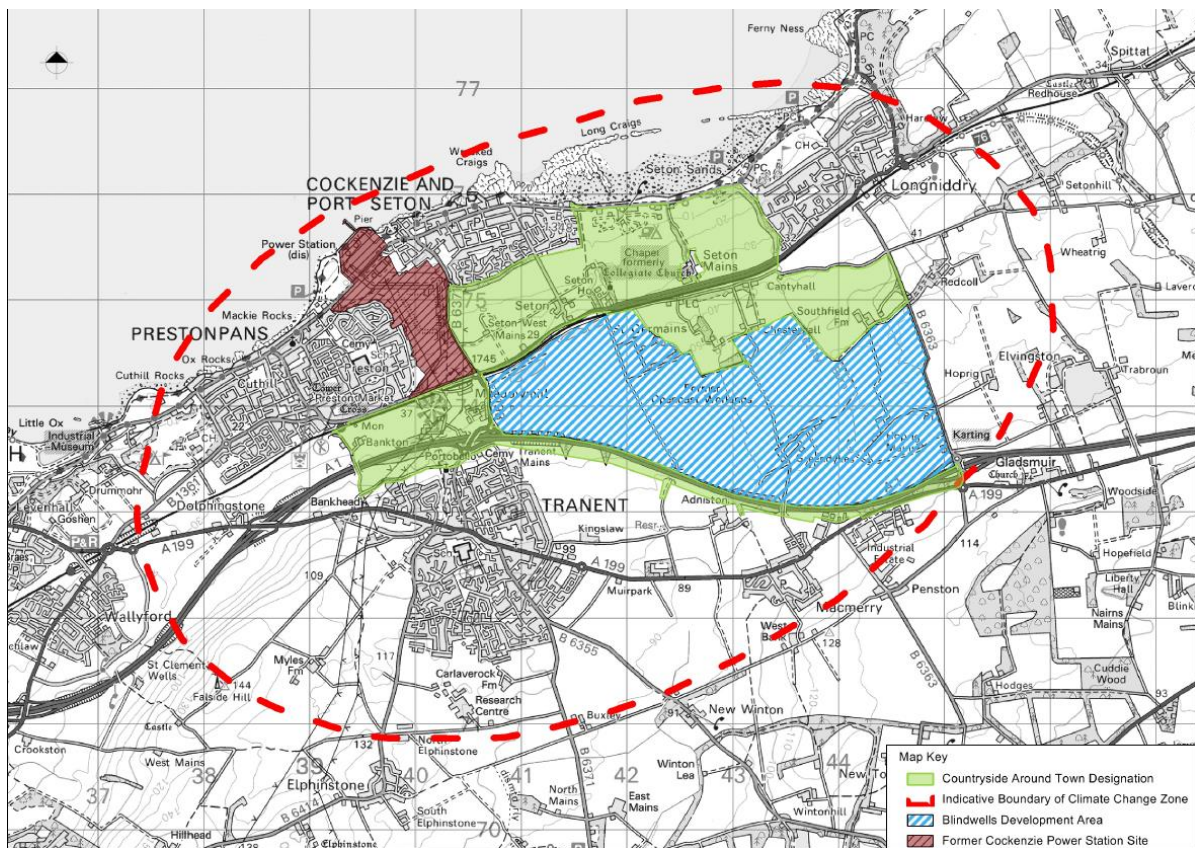
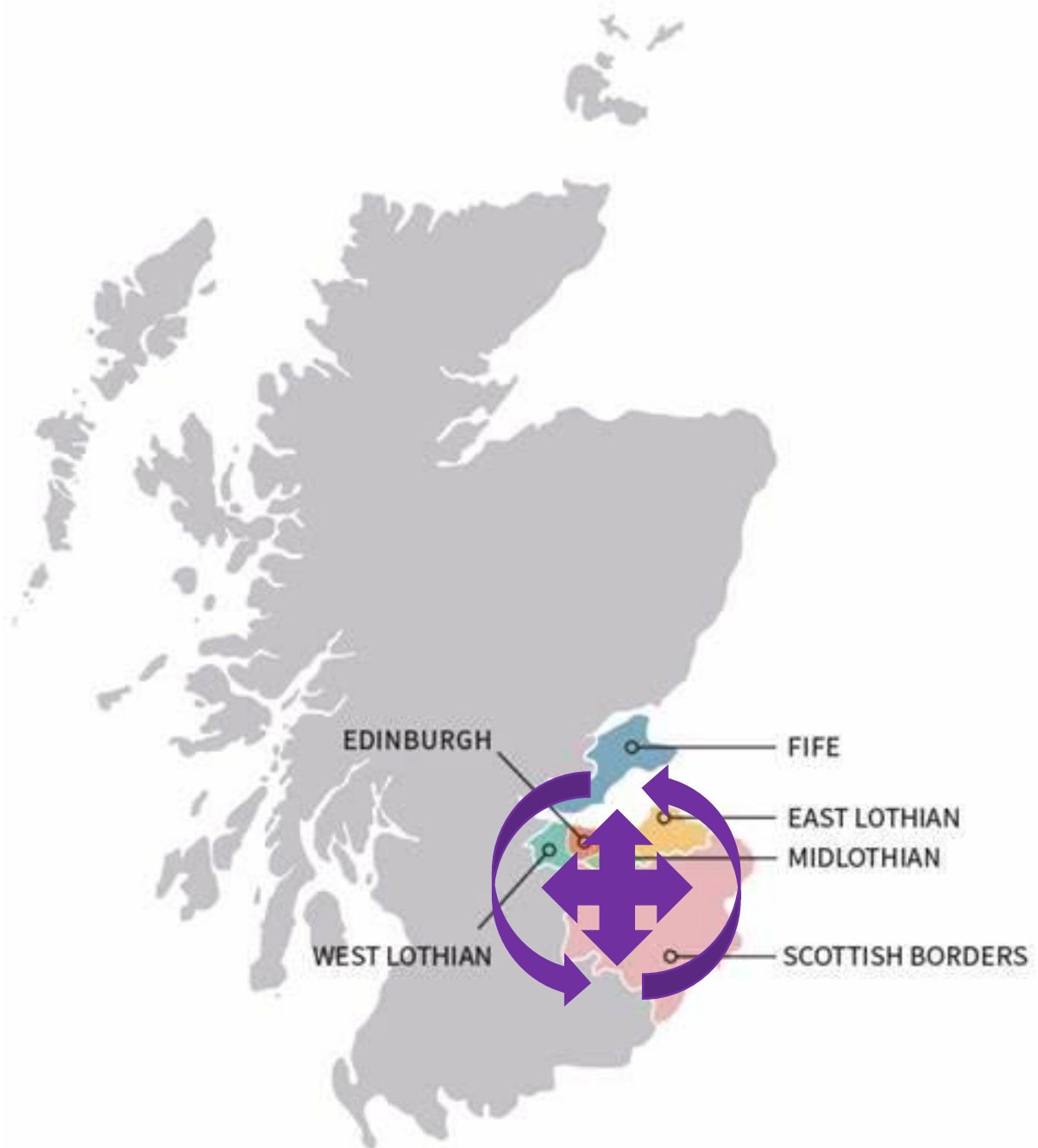


Figure 3: Indicative Boundaries of Candidate National Development Area

# 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 mid-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, and Edinburgh Innovation Park at Musselburgh cluster around the A720 (east end), A1, and East Coast Main Line; with Easter Bush nearby in the A701 growth corridor. The Borders Railway remains a major corridor for sustainable growth and rural regeneration; and there are also opportunities for tram line links to centres in Midlothian. A potential extension of the Borders Rail Line to Carlisle 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 and Drink), Shawfair and Easter Bush; world leading innovation and business potential, together with significant infrastructure improvements to accommodate and facilitate 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**.



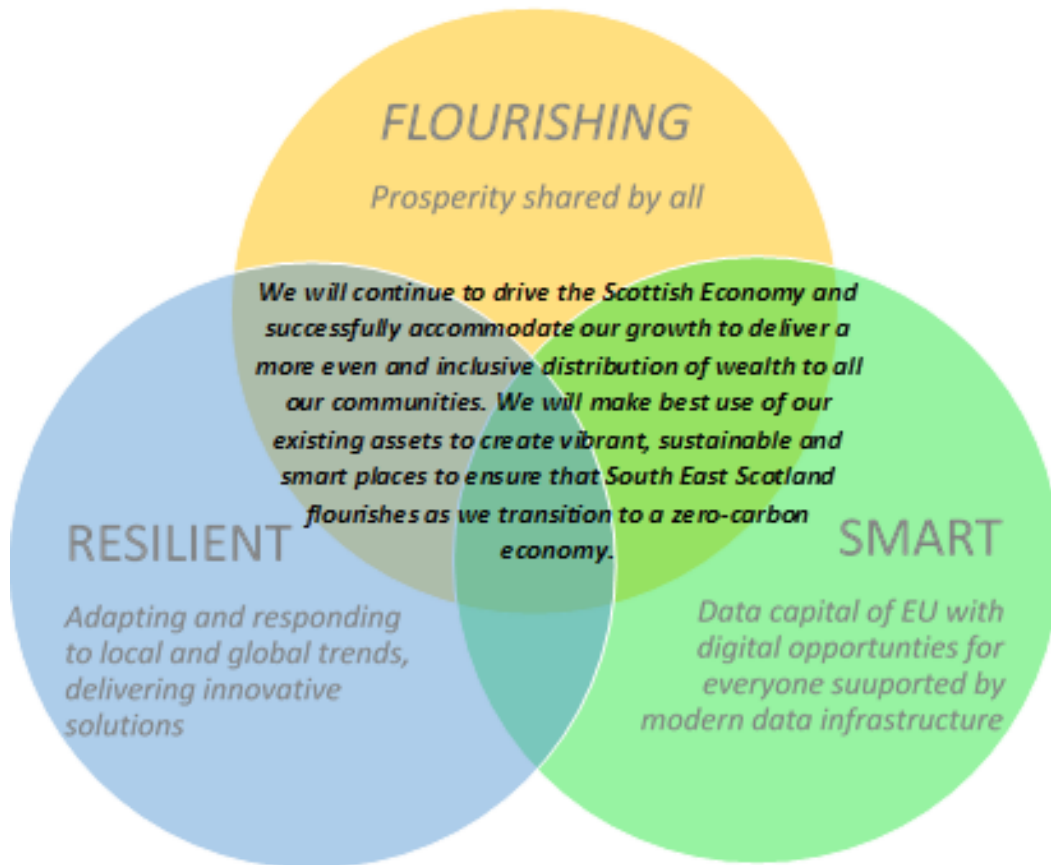


Figure 1 – Emerging RGF themes

### *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, agri-tech, 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 ESESCRD 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) and Regional Transport Strategy (RTS), with an addition to incorporate the strategy for North East Fife to reflect the geographical extent of the City Region Deal. 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, along with the RTS, 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, 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 - 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.
- Establish land use strategies which are supported by the regional transport strategy, and work to deliver a broad range of outcomes for people and communities, and does not, nor will 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 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, 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. 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 sustainable 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 and regional partnerships.

Partners in the Region 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 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 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 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.