SUBMISSION FROM CITY OF EDINBURGH COUNCIL

Introduction

This submission is provided in response to the requests by the Economy, Energy and Tourism Committee and the Infrastructure and Capital Investment Committee for views on the Proposed Third National Planning Framework (NPF3). It is based on the Council’s comments on draft NPF3 that were approved by the Planning Committee on 8 August 2013. The Council is concerned about a lack of commitment within the NPF to the delivery of national priorities.

Potential for Growth

NPF3 recognises the Edinburgh city-region as an area of significant growth. The city-region already supports many of Scotland’s most important economic assets and contains a number of future opportunities. Within Edinburgh itself, NPF3 identifies the City Centre, Waterfront, West Edinburgh and South East Edinburgh as the main locations for growth (page 9). The proposals within the West Edinburgh Planning Framework in particular (expansion of Edinburgh Airport, relocation of the Royal Highland Showground and development of the International Business Gateway) form part of a National Development (pages 54-55). The NPF describes West Edinburgh as a national gateway and recognises significant opportunities for business development in this area (para 5.19 and page 44).

Edinburgh and the south east is identified as an area where population growth is projected to be highest and housing requirements most acute. To accommodate growth, NPF3 identifies a need to ensure a generous supply of housing land in sustainable places, providing enough homes and supporting economic growth.

Accommodating the Growth

NPF3 acknowledges that, in some city-regions, infrastructure capacity constraints are limiting the delivery of new housing (para 2.18). It identifies a number of projects across Scotland, already included in the Infrastructure Investment Plan, which are underway or planned. In relation to Edinburgh, NPF3 recognises that road network capacity has particular implications for future housing development and that current interventions are insufficient to address the issue (page 9).

NPF3 requires “a more concerted effort” to remove these constraints and suggests the use of existing infrastructure and service capacity as the most viable and sustainable option (para 2.18). It also proposes increasing density as a means of accommodating much of the growth (para 2.19).

NPF3 suggests that the longer-term spatial strategy for delivering housing land in the Edinburgh city-region will need to acknowledge and address its infrastructure constraints (page 9). Edinburgh and the south east is the only city-region in Scotland where the Framework identifies such constraints as a particular issue.
The Council's Comments

The Council welcomes the recognition in NPF3 that the Edinburgh city-region is an area of growth of importance to the Scottish economy. The Council also welcomes its recognition of the significant infrastructure constraints that the city-region faces.

However, the Council is concerned that NPF3 does not adequately address these constraints at the national level but effectively leaves it to planning authorities to solve the problem. Having identified Edinburgh’s growth potential, the NPF should recognise more explicitly the role of central government in helping to fund the infrastructure required to support the national strategy.

The infrastructure projects referred to in NPF3 are all existing commitments that predate the Framework. Whilst identifying areas for further growth, NPF3 does not contain any new infrastructure proposals. The Council submits that the NPF, in setting out its spatial vision for Scotland, should be leading the provision of infrastructure, not following it.

The Framework identifies the Edinburgh city-region as an area for growth, and investment programmes should reflect this priority. The infrastructure needed to support its growth is identified in the Action Programme that accompanies the SESpplan Strategic Development Plan, recently approved by Ministers.

In particular, West Edinburgh is identified as a National Development yet no provision is made to fund the infrastructure required to deliver it, and thereby achieve the modal share targets that have been previously agreed with the Scottish Government. It should be stressed that the sums involved are well beyond the resources of this Council.

The Council is not persuaded that “a more concerted effort” will be sufficient to remove its infrastructure constraints. It is for the NPF to take a lead on where the national priorities lie and it would be logical for national resources to be focused on the places that NPF identifies for further growth.

Strategic infrastructure such as new stations, tram extensions or improvements to trunk roads cannot be fully funded by developer contributions. In addition, it is important to note that certain uses such as airports cannot be called upon to contribute to off-site infrastructure as they fall largely outwith the planning system.

The Council is not persuaded that it is practical to rely on making use of existing infrastructure and service capacities. In most cases, there is simply no capacity (e.g. roads) and in other cases the capacity is in the wrong places (e.g. schools).

Neither is the Council persuaded that increasing the density of development “could accommodate much of this growth”. The Council fully supports the concept of a compact city and in the urban area it requires all sites to be used to their full potential. However the housing requirement is so large that brownfield land, even at high densities, cannot possibly accommodate it. In addition, such a strategy would not conform to the requirement in draft SPP to provide a range of housing sites. It should also be recognised that the financial conditions following the banking crisis make development at higher densities much more difficult to deliver.

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In summary, the Council is disappointed by some of the statements in NPF3 that suggest a lack of commitment to the delivery of national priorities. A failure to deliver the necessary infrastructure will either constrain the delivery of housing and associated economic growth or result in an unsustainable pattern of urban development, increased congestion and pollution. Enabling the growth of the Edinburgh city-region is a national issue which requires to be addressed if the ambitions set out in the Proposed NPF3 are to be realised.

**Action Requested**

The Council requests that NPF3 is redrafted to recognise the need for future spending reviews to bring forward the currently unfunded strategic infrastructure necessary to support sustainable economic growth in the Edinburgh city-region.

City of Edinburgh Council
January 2014