

Planning Committee

10.00am, Wednesday, 29 September 2021

City Plan 2030 – Approval of Proposed Plan for Statutory Representation Period

Executive/routine Wards Council Commitments	Executive All 1, 2, 4, 10, 11, 12, 18, 26
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1. Recommendations

- 1.1 It is recommended that Committee:
 - 1.1.1 Approves the Proposed Plan, as set out in Appendix 1, for its statutory period of representation;
 - 1.1.2 Approves the technical and other supporting information which is statutorily required to be considered alongside the Proposed Plan (Appendices 2 – 13);
 - 1.1.3 Agrees that the Proposed Plan be published (subject to any minor typographical editorial changes) for its period of public representation (six weeks); and
 - 1.1.4 Approves the Development Plan Scheme and Programme of Engagement (Appendix 9).

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Report

City Plan 2030 – Approval of Proposed Plan for Representation Period

2. Executive Summary

- 2.1 The purpose of this report is to seek the Committee’s approval of the Proposed Plan and its supporting documents as set out in the appendices to this report. Approval of the Proposed Plan is required so that the Local Development Plan (LDP) process can move to its next stage, the statutory period of representation, before it can be submitted to Scottish Ministers for Examination.

3. Background

- 3.1 Local authorities have to prepare LDPs for their areas and keep them up to date. LDPs should not be older than five years.
- 3.2 The City of Edinburgh Council adopted its first LDP in November 2016. The replacement LDP is to be called City Plan 2030.
- 3.3 The development of City Plan 2030 commenced in 2018. At its meeting of [30 May 2018](#), the Planning Committee received a report which set out an overview of the project and the overall objectives for the project, including alignment with the wider strategic context for the Council and its partners.
- 3.4 There are several other projects and strategies being progressed or implemented in parallel with the City Plan 2030. Work has been on-going since May 2018 to ensure that these projects inform and are informed by City Plan 2030.
- 3.5 The 2018 report also identified some of the main requirements and constraints on the development of the plan. These include statutory requirements, which must be met if the Council is to adopt City Plan 2030 and avoid a successful legal challenge.

4. Main report

- 4.1 The Proposed Plan follows on from the statutory consultation stage of the LDP process. The Main Issues Report, titled Choices for City Plan 2030 (Choices), was approved by Planning Committee in [January 2020](#) to go out for consultation. The

latter part of that consultation period was affected by the Covid-19 pandemic and therefore we accepted consultation responses to the end of April 2020.

- 4.2 Choices set out four outcomes based on national, regional, and local strategic and policy objectives to fulfil the statutory purpose of planning (which is to manage the development and use of land in the long-term public interest, including development which contributes to sustainable development, or achieves national outcomes (within the meaning of Part 1 of the Community Empowerment (Scotland) Act 2015)). This amends the provision of the 2006 Act that requires plans to contribute towards sustainable development, taking account of Scottish Planning Policy (SPP).
- 4.3 Choices for City Plan 2030 set out a preferred approach for development as well as reasonable alternatives, as required by statute.
- 4.4 The response to the Choices consultation was reported to Planning Committee in [August 2020](#). The Council's response to the comments made is now included in the Report of Conformity and Schedule of MIR Responses (Appendix 4) as part of the technical and other supporting information which is statutorily required to be considered alongside the Proposed Plan itself.
- 4.5 The Proposed Plan (Appendix 1) sets out the recommended strategy, sites, proposals and policies for development over the next 10 years. The written statement is also accompanied by the Proposals Map.
- 4.6 In preparing the Proposed Plan and supporting documentation, due consideration is given to the preferred approach and reasonable alternatives arising from the Choices consultation in the context of the responses received, assessment of the responses, and to the technical work carried out to inform the Proposed Plan and subsequent stages.

Strategy

- 4.7 The Proposed Plan carries forward the preferred approach of Choices and does not seek to allocate new greenfield sites.
- 4.8 As a review of the existing LDP 2016, it is recommended that City Plan 2030 carries forward the sites proposed in the 2016 plan which have not yet been substantially completed or where development has not yet commenced. Some of these sites are greenfield land considered appropriate for development through the LDP 2016.
- 4.9 Existing allocated sites are appropriate sites for development, as considered by the Council previously through that LDP process and through the representation, Examination, and Ministerial approval prior to the adoption of the LDP 2016 by the Council. None of the technical appraisal work carried out in respect of the Proposed Plan gives grounds to de-allocate those sites.
- 4.10 A requirement of LDPs is to ensure that sufficient land is allocated for housing, employment and other appropriate purposes.
- 4.11 In addition to the land supply provided by the existing LDP, other sites and from planning permissions, the Council must allocate sufficient land for future needs

within the lifetime of the plan and to ensure a continuing five year supply of housing land.

- 4.12 Requirements for this are normally set by the Strategic Development Plan for the area. However, as the Strategic Development Plan 2 (SDP2) was rejected by Scottish Ministers and plans over five years old are (in terms of Scottish Planning Policy) considered to be out of date, the Council has to consider an appropriate and reasonable land supply for City Plan 2030. This is covered in the strategy section of the Proposed Plan and in further detail in the Housing Technical Note [Appendix 7].
- 4.13 The principles of the strategy expect development to make the most efficient use of land, of existing and new infrastructure, of sustainable transport modes and to provide a range of uses to support 20-minute neighbourhoods. Use of brownfield land is key, as is ensuring that higher density, mixed use development is required for any greenfield sites also.
- 4.14 The strategy supports the strong direction of policy required by the Climate Change Act, the National Transport Strategy, Housing for 2040 and the emerging policy of the Position Statement National Planning Framework 4.

Sites

- 4.15 To fulfil these requirements it is recommended that, in addition to the existing land supply, the Proposed Plan allocates brownfield sites for new development, generally within the urban area but with the addition of the significant brownfield site of Crosswinds on land formerly part of the operational site of Edinburgh Airport. This reflects the preferred approach set out in the Choices document.
- 4.16 These sites are mapped in the strategy diagrams of the Proposed Plan and on the Proposals Map. Further details of the proposals, site briefs and mechanisms for further site brief and master plan requirements is found in the Place Policies section of the Plan.
- 4.17 The technical work which supports this approach explains the reasoning for why an alternative approach of utilising potential greenfield sites has not been included, particularly in terms of transport impacts.

Policies

- 4.18 Policies have been reviewed in the light of the emphasis of new and emerging national policy on sustainability, particularly from the Position Statement on National Planning Framework 4, National Transport Strategy, Strategic Transport Projects Review (STPR2).
- 4.19 New and amended policies cover a range of matters including:
- 4.19.1 New **Place policies** allocating sites for mixed-use housing-led development, alongside site briefs for:
- Edinburgh City Centre;
 - Edinburgh Waterfront;
 - West Edinburgh; and

- Seafield, Redford Barracks, Astley Ainslie, Edinburgh BioQuarter, Liberton Hospital, Bonnington, Fettes and other major sites across the city.

4.19.2 Suite of new and amended **Environment and Design** policies which:

- Mitigate against the impact of climate change, including carbon neutral buildings;
- Ensure future adaptation by embedding water management, biodiversity, and green and blue infrastructure within development;
- Deliver open space in all development to a new five hectare (ha) extra-large greenspace standard; and
- Deliver new housing at a density which supports sustainable transport, community services and 20-minute neighbourhoods.

4.19.3 Suite of new and amended **housing policies** to:

- Deliver 35% affordable housing as part of new development;
- Manage the loss of housing, including new policies on short term lets; and
- Deliver housing as part of all development sites.

4.19.4 New and updated **economy** policies to support jobs including:

- A new policy to promote inclusive growth – which supports development that contributes towards addressing poverty and inequality, Edinburgh City Centre Transformation, cultural festivals, events throughout the city, universities, colleges and life science research.

4.20 Some of these changes to policy anticipate emerging national policies, whilst others may be going further than anticipated national policy changes. The justification for this approach is the need to respond urgently to climate change impacts and to address these as quickly as possible.

Participation Statement

- 4.21 Appendix 9 (Development Plan Scheme) sets out a revised participation statement with engagement activities.
- 4.22 The impact of the current Coronavirus pandemic (Covid-19) on the period of public representations to the Proposed Plan is not known at this stage. Whilst lockdown measures have been removed, there are still recommendations/requirements for wearing masks and physical distancing which might compromise traditional, in person, engagement. Therefore, an update to this participation statement will be provided before the representation period starts.
- 4.23 The updated participation statement sets out plans for proposed engagement which take account of the Coronavirus requirements at the time of writing. Any further waves of the pandemic may result in further restrictions which will need to be taken into account in the process.

- 4.24 The participation statement sets out that the following activities will be maximised to raise awareness and encourage people to have their say on the proposed plan:
- 4.24.1 Launch of proposed plan;
 - 4.24.2 Publicity to raise awareness of proposed plan;
 - 4.24.3 Statutory neighbour notification;
 - 4.24.4 Notification to those groups and individuals on the project mailing list telling them how to make representations;
 - 4.24.5 Staffed exhibitions in public places to raise awareness, if possible;
 - 4.24.6 Drop-in sessions to allow opportunity to find out more about consultation proposals, if possible;
 - 4.24.7 Best practice online/digital engagement (as guided by the Scottish Government's digital planning programme) which could include virtual exhibitions, a planning engagement hub, webinars and online events; and
 - 4.24.8 Non-digital engagement - including opportunities to ask informal questions, telephone surgeries, printed newsletters, hard copies of documents, paper letters and engagement via other council services.

Period of Representation

- 4.25 If approved the Proposed Plan must then go out for a statutory minimum period of representation of six weeks.
- 4.26 The Proposed Plan and supporting documents would then be published on the Council's website and paper copies placed in libraries for a period of six weeks. To avoid an overlap with ongoing Council consultations it is intended this start on 7 November.

5. Next Steps

- 5.1 Once the representation period is closed, the representations received will be considered and recommendations reported to Planning Committee. If no amendments are made to the Proposed Plan in the light of representations, then it will be submitted for Examination along with its supporting documents and the required summaries of the representations (Schedule 4 documents). If amendments are required then there may need to be further technical work and consultation carried out depending on the significance of the changes and whether they had been part of the Choices considerations.
- 5.2 Subsequent stages of the process will be dependent on the length of the Examination period. It is expected that the minimum time taken for Examination will be six months, and while the time taken generally averages nine months, it is often longer before the outputs of the Examination report are known.
- 5.3 The Reporter's recommendations are 'largely binding' on the Council and the recommended modifications must be considered before resolving to adopt the Plan

and submitting this to Scottish Ministers as the Plan the Council wishes to adopt. If Ministers do not direct further change then the Council should be able to adopt the Plan when this is confirmed.

6. Financial impact

- 6.1 This Proposed Plan and the recommendations of the report have direct financial impacts. The likely financial implications of the Proposed Plan are set out in summary here and in the following supporting reports:
 - 6.1.1 Education Appraisal;
 - 6.1.2 Transport Assessment; and
 - 6.1.3 Healthcare Appraisal.
- 6.2 The Education Appraisal sets out the likely impact on the Education Estate, though this will be further determined after informal and formal consultation with schools and their communities so as to ensure all options to manage the impacts of City Plan development are considered fully and properly in the context of existing requirements from rising school rolls and the 2016 LDP. Provision of community facilities will be part of the implementation of education provision by the Council.
- 6.3 The Education Appraisal sets out the impacts of each of the above on each school and the likely costs in each case. These will be reviewed following the consultation processes described above and annually through the City Plan Action Programme.
- 6.4 The overall costs are currently assessed as circa £307M and developer contributions will be sought for the actions needed to mitigate the impacts of City Plan developments. These will be reported through supplementary planning guidance and future iterations of the Action Programme.
- 6.5 The Transport Assessment sets out the mitigations required to deal with City Plan growth including high level costings. The preference is that works will be carried out by developers wherever possible, however, for larger projects the Council will need to coordinate developer contributions and implementation to ensure comprehensive solutions are provided.
- 6.6 The transport mitigations and individual costings for the brownfield sites are set out in the Transport Assessment. These will be subject to developer provision for individual brownfield sites wherever appropriate, for clusters of sites and, in the case of Tram, relevant clusters of sites. For West Edinburgh, updated versions of the cumulative contributions models for Tram and the West Edinburgh Transport Appraisal (WETA) and West Edinburgh Transport Improvement Programme (WETIP) will be used to assess and apportion costs and contributions.
- 6.7 The cumulative high-level figure of £91.9M for transport contributions for brownfield sites as set out in the Transport Assessment will be addressed by developer contribution assessments. For West Edinburgh costings for the mitigating actions are being assessed. Whilst developer contributions will be a significant requirement

for this, the assessment needs to take account of the City Region Deal funding commitment for WETA related projects (£36M) and Bus Priority funding (£1.1 M), with proportionate requirements for developer contributions to be detailed in future supplementary planning guidance.

- 6.8 The current Healthcare Appraisal is high level and indicative in terms of capacity impacts and not costings at this time. There is a need to consult with GP practices and to assess the financial implications as well as capacity requirements. Given impact of the Covid-19 pandemic, there have been significant difficulties in forming detailed requirements and this will be reported in due course. Developer contributions will be required to fund capacity improvements as necessary and further requirements will be set out in supplementary planning guidance.

7. Stakeholder/Community Impact

- 7.1 Early engagement has informed the process of arriving at the Proposed Plan stage of the LDP process.
- 7.2 The formal consultation stage is set out in statute and focuses on the main issues report (Choices for City Plan 2030). The Proposed Plan stage includes for a statutory period of representation. All unresolved representations are considered at Examination of the Proposed Plan.
- 7.3 City Plan 2030 has a key role in delivering Edinburgh's vision and aligns with the Edinburgh Economy Strategy which is tailored towards delivering good growth for everyone.
- 7.4 An Integrated Impact Assessment (IIA) has been carried out as an integral part of the plan project and is reviewed and updated at each stage of the process and available as a public document. The IIA identifies potential negative impacts on business and urban communities resulting from providing housing land in existing urban areas.
- 7.5 The IIA assessment concludes that overall the Proposed City Plan 2030 will support equality, health and well-being and human rights and have positive socio-economic impacts overall. There are no expected negative impacts. Further IIAs will be carried out as the project progresses.
- 7.6 The risks associated with this area of work are significant in terms of finance, reputation, and performance in relation to the statutory duties of the Council as Planning Authority and in several of its other capacities.
- 7.7 Project governance arrangements include regular monitoring and management of identified risks.
- 7.8 Detailed project governance arrangements and controls have been informed by the findings of an internal audit. The recommendations of this audit were referenced in a report to the Governance, Risk and Best Value Committee on [16 January 2018](#).

- 7.9 The ability of the Council to successfully manage the impacts arising from the growth of the city through the proposed plan is critical to achieving sustainable development. The Proposed Plan has been formed in the context of existing and emerging national, regional and local strategies and policies as well as climate change and other legislation to support sustainable development alongside the Council's net-zero strategy.
- 7.10 A Strategic Environmental Assessment is being carried out as an integral part of the plan project. Its findings are set out in an Environmental Report (Appendix 11) which remains a draft document until the plan is adopted in its final form. The Environmental Report will be the subject of its own separate statutory consultation.

8. Background reading/external references

- 8.1 Development Plan Scheme, [December 2020](#)
- 8.2 [City Plan 2030](#)

9 Appendices

- 9.1 Appendix 1 – Proposed Plan Written Statement.
- 9.2 Appendix 2 – Proposals Map.
- 9.3 Appendix 3 – Action Programme.
- 9.4 Appendix 4 – Report of Conformity and Schedule of MIR Consultation Responses.
- 9.5 Appendix 5 – Transport Assessment.
- 9.6 Appendix 6 – Education Appraisal.
- 9.7 Appendix 7 - Housing Technical Note.
- 9.8 Appendix 8 - Healthcare Appraisal.
- 9.9 Appendix 9 - Development Plan Scheme September 2021.
- 9.10 Appendix 10 – draft Habitats Regulations Assessment.
- 9.11 Appendix 11 – draft Environmental Report – Strategic Environmental Assessment.
- 9.12 Appendix 12 – draft Integrated Impact Assessment.
- 9.13 Appendix 13 – Strategic Flood Risk Assessment.