

All Committee meetings of Fife Council were cancelled with effect from 23rd March 2020, due to Covid-19 emergency.

The recommendations in this report were approved by an Executive Director of Fife Council, acting under delegated authority in terms of paragraph 2.1.1 of the Council's List of Officer Powers.

27th March 2020.
Agenda Item No. N/A

Fife Council Response to City of Edinburgh Council's Local Development Plan (City Plan 2030) Main Issues Report

Report by Pam Ewen, Head of Planning Services

Wards Affected: All

Purpose

To inform Committee members of the potential impacts on Fife of the preferred strategy and policy options contained within the [City of Edinburgh Council's Local Development Plan \(City Plan 2030\) Main Issues Report](#).

Fife Council's response to the specific questions asked in the City Plan 2030 online consultation can be found in Appendix 1 of this report. There is also a separate City of Edinburgh Council consultation underway on the City Mobility Plan 2030. Some of the themes and areas of action addressed through the City Mobility Plan 2030 are touched on in this report. However, Fife Council Transportation Services have been consulted on the Mobility Plan and will respond in separately with support from other Council services including Planning Services.

Recommendation(s)

It is recommended that Committee:

1. Approve this report including the positions stated regarding land use and spatial impacts on the Fife Council area from future growth strategies within Edinburgh City; and
2. Delegate the Head of Service (Planning Services) to respond to the consultation by the City of Edinburgh Council (CEC) enclosing this response and agree that non-substantive changes can be made, if required, with the approval of the Committee Convenor.

Resource Implications

There are no financial or staff resource commitments relating to CEC's Main Issues Report.

Legal & Risk Implications

The proposed submissions to the Edinburgh City Plan consultation do not commit Fife Council to any actions and do not have any legal or risk implications. However, failing to submit a response at this stage may result in it being more difficult to engage in future stages of the Edinburgh City Council Local Development Plan (City Plan) process as our early views will not have been recorded or considered.

Spatial planning and market risks are identified from proposed potential growth strategies set out within the consultation document, specifically that proposed Western housing growth of Edinburgh City (along Glasgow Road, Edinburgh and Edinburgh Airport corridors). The western housing growth, along with other potential land releases or revised employment allocations, are likely to create greater competition between sites in Edinburgh and south-Fife as part of the greater Edinburgh housing market area. The Edinburgh growth is likely to impact on the build out rates of housing sites in Fife and could place additional pressure on infrastructure provision.

Impact Assessment

An Integrated Impact Assessment does not require to be carried out by FC as this report does not propose any change to existing FC policies. An Equality Impact Assessment may be required later in the Edinburgh City Plan process for more detailed Fife Council and/or partner submissions.

The Fairer Scotland Duty, which came into force on 1 April 2018, requires the Council to consider how it can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions. Both CEC and FC align with this duty in their commitment to achieving inclusive economic growth, which is shared by all. The issues identified and suggested in this response by Fife Council to the Proposed City Plan support this.

Consultation

Planning, Economic Development, and Transportation Services have all been consulted on the content of this report. The Head of Legal and Democratic Services, Head of Finance and Head of Housing Services were also consulted in the development of this report.

1.0 Background

- 1.1 The City of Edinburgh Council is preparing a new Local Development Plan (City Plan 2030). This will set out policies and proposals for development in Edinburgh between 2020 and 2030. The Edinburgh City Plan 2030 Main Issues Report (MIR) focusses on the City and immediate surrounding area, however, decisions taken will have some impact on Fife.
- 1.2 Edinburgh is consistently voted one of the best cities in the world in which to live, work and study. But, like many cities, Edinburgh also has increasing levels of poverty and health inequalities in its communities, rising housing costs, and in some areas, traffic congestion and poor air quality. The City needs to adapt to meet the needs of an aging population, address the increasing impact of climate change on the city and ensure growth is sustainable. Edinburgh has a target to be carbon neutral by 2030.
- 1.3 By 2030, Edinburgh wants to be:
 - A sustainable city which supports everyone's physical and mental wellbeing;
 - A city where you don't need to own a car to move around;
 - A city in which everyone lives in a home they can afford;
 - A city where everyone shares in its economic success.
- 1.4 The first key stage in the preparation of Local Development Plan (City Plan 2030) is the publication of a Main Issues Report (MIR). The MIR identifies the key planning issues and options for discussion and is one of the main consultation stages in the preparation of the City Plan 2030.
- 1.5 Following an 8-week MIR consultation, CEC intend to produce the Proposed City Plan 2030 informed by MIR consultation responses and other associated studies and consultations. There will then be an additional period for representations when the Proposed Plan is published which Fife Council will respond to.
- 1.6 Edinburgh are consulting on 16 Choices for City Plan 2030. These 16 Choices contain their preferred option(s) and at least one reasonable alternative for changing planning policy. These Choices can be accessed by clicking on the weblink under the 'Purpose' section of this report (above).
- 1.7 The MIR has been prepared in accordance with the Town and Country Planning (Scotland) Act 1997, the approved Strategic Development Plan for South East Scotland, Scottish Planning Policy and Circular 6/2013 Development Planning. A MIR is accompanied by a Monitoring Statement and an Environmental Report. Edinburgh's MIR is also accompanied by a Housing Study, a Commercial Needs Study, a Financial Resources Appraisal and a participation statement.
- 1.8 This report highlights and explores the potential impacts of the CEC's preferred options on Fife. Not all the options in the City Plan 2030 MIR will impact on Fife and for that reason those that will not impact have not been addressed in this report.

2.0 Impacts on Fife arising from City of Edinburgh Council’s MIR Preferred Options

Building our new homes and infrastructure

2.1 CEC propose that City Plan 2030 uses the housing supply targets set out in Strategic Development Plan 1 (SESplan1), along with the updated housing need and demand assessment (HNDA2) prepared for the SDP 2 (SESplan2) to determine how many homes to provide to 2032. These calculate Edinburgh’s housing need from 2019 to 2032 as:

- Market Housing (SDPA1+HNDA2) = 22,600
- Affordable Housing (Council commitment to 2027) = 20,800*

*Affordable housing delivery will continue to be delivered beyond 2027

2.2 Fife Council would prefer that CEC adopts the same or comparable approach to that approved by the SESplan Joint Committee in September 2019 and subsequently endorsed by [Fife Council’s Economy, Tourism, Strategic Planning and Transportation Committee on 30th January 2020](#). This looks towards the strategy and housing targets contained within SESplan2. Following such an approach would then follow the legal advice received by SESplan and promote consistency across the region. If CEC do not adopt this approach, it is imperative that the city is able to accommodate the growth outlined in options 1, 2, and 3 (Table 1 – Delivery Options below).

Option 1 Delivery by the Council and its partners within the Urban Area	Option 2 Delivery through market housing by releasing Greenfield land	Option 3A Blended Approach
17,600 units within the urban area	27,900 units on greenfield land	A mix of the urban area land (approx. 11,000 units) and greenfield land (approx. 6,600 units)
We will rapidly intervene to deliver urban area, Council and partner’s land for housing or mixed use development	We will identify a large planned green belt release	We will increase urban area delivery and identify some planned green belt release
Will require new and significant changes to existing infrastructure - schools, healthcare and transport	Will require a significant new infrastructure - schools, healthcare and transport	Will require a significant new infrastructure - schools, healthcare and transport
We will work with public sector partners to deliver this approach	Urban area land will come forward without intervention	We will Intervene to deliver significant housing in urban area
We will need to intervene to deliver 275 hectares of employment land as part of mixed-use redevelopment of sites and elsewhere	We will manage loss of employment land through other policy changes in Choice 16.	This may require a CPO programme to ensure land comes forward
This approach may require a significant CPO programme to ensure land comes forward		We will need to deliver employment locations elsewhere and as part of mixed-use redevelopment of sites through other policy changes in Choice 16.

Table 1 – Delivery Options

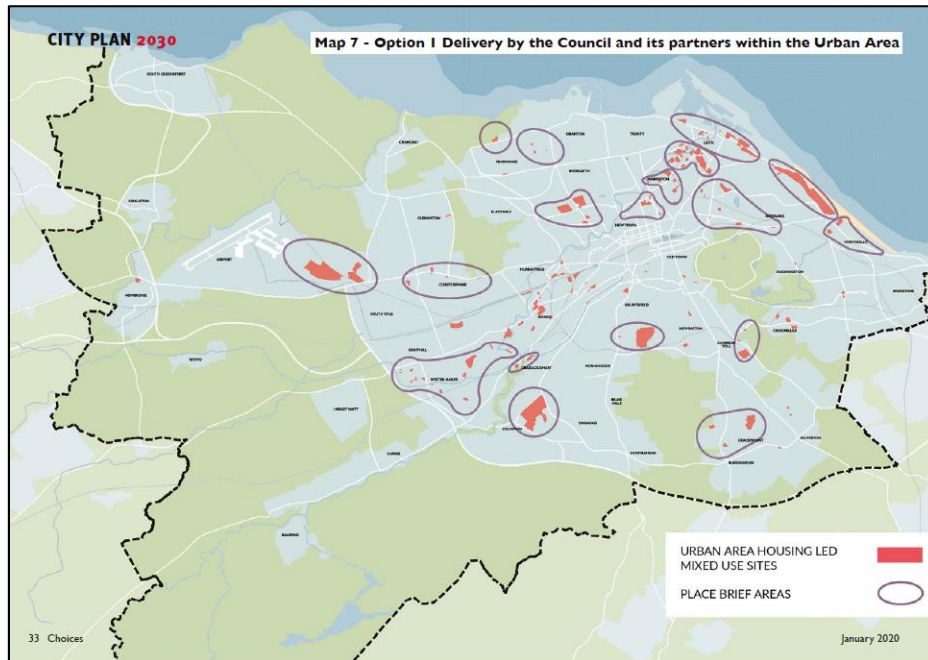
2.3 It is anticipated that the National Planning Framework 4 (NPF4), which will be published in draft form in late 2020, will provide further clarity regionally on housing numbers and again, CEC is encouraged to reflect that methodology.

CEC’s Growth Strategy

2.4 CEC proposes three options regarding growth with a preference for Option 1:

- Option 1 (Council/Partners/Urban Area);
- Option 2 (Market/Greenfield); or
- Option 3 (Blended approach).

- 2.5 The MIR presents options on who should deliver the new homes; the options being the Council and its Partners deliver 17,600 homes (Option 1), or delivery through market housing of 27,900 homes (Option 2). The latter would require, as set out in the MIR, additional land for 10,300 units to ensure the 35% level of affordable housing mix is achieved through market housing. A third option is set out which is a blended approach of the other two options which would deliver 167,600 homes of which 6,600 of these units would be on greenfield land.
- 2.6 CEC prefers Option 1 proposing urban growth with the development of 17,600 homes in the city re-using brownfield land (see Map 1 below) with an additional area of search proposed West of Edinburgh for further development.
- 2.7 Fife Council considers it important to maximise urban growth through suitable brownfield land and, where this can be delivered, within the Plan period. The Market/Greenfield approach (Option 2), raises significant concern on the extent of greenfield expansion which would have a greater impact on the housing markets of surrounding areas, such as South Fife. It is considered that this would impact on the ability to make the transformational change that is set out relating to transport choices and climate change actions in particular. The option of releasing greenfield land to deliver considerable expansion to the West of the city around Kirkliston, West Edinburgh, and Calderwood is not preferred by CEC, however, if all these areas were to be allocated for new homes over the Plan period, Fife Council would have considerable concerns. Option 3 (blended approach) raises similar concerns given that this option should aim to reduce greenfield land release, however this option still identifies the same general locations as per the greenfield option. Option 1 (Council/Partners/Urban Area) approach is supported by Fife Council.

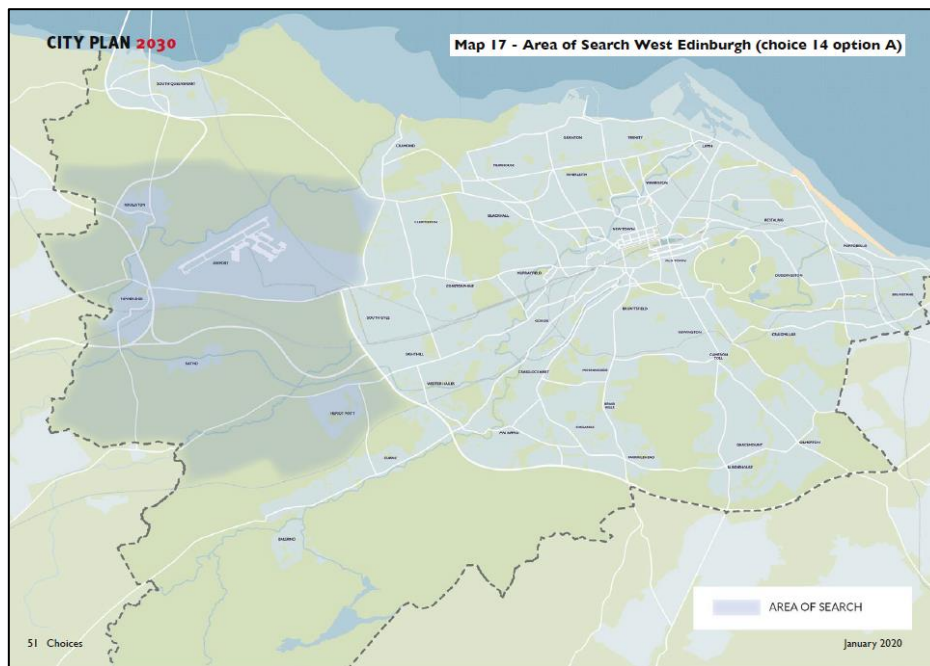


Map 1 City Plan 2030 – Option 1 Council/Partners/Urban Area (preferred option)

West of Edinburgh Area of Search (development)

- 2.8 A relatively large area of search for development is proposed West of Edinburgh (Map 2 below). The eventual location(s) for development in this area will determine

the type and extent of any impact on Fife. With major uses including Edinburgh Airport and the Royal Highland Centre, West Edinburgh currently has significant land allocations in the current plan due to its potential for growth, particularly business growth in the International Business Gateway, and for housing at Maybury and Cammo.



Map 2 City Plan 2030 – Area of Search West Edinburgh

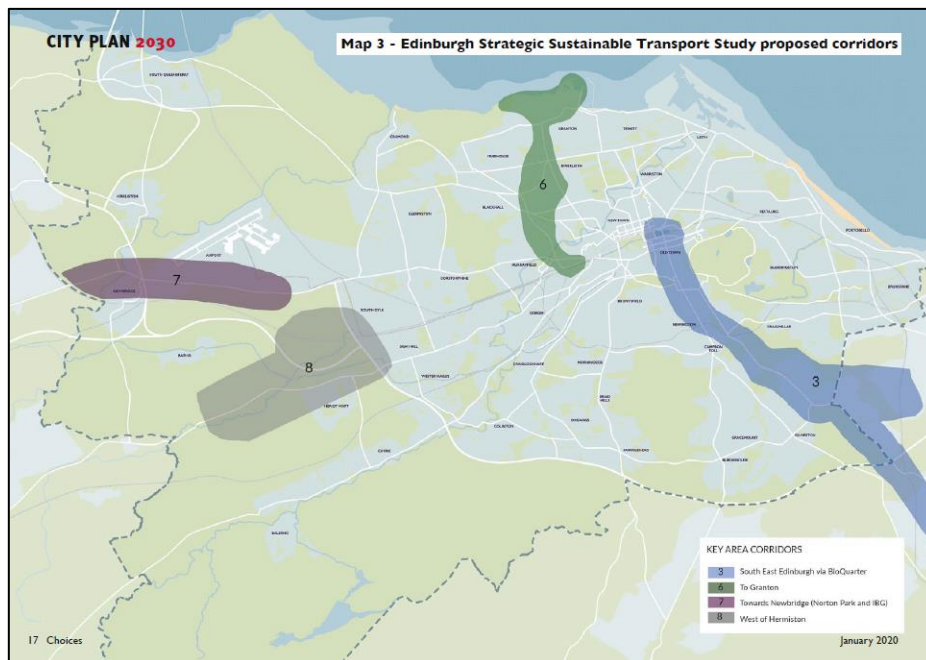
- 2.9 It is proposed that the safeguarding in the existing plan for the relocated Royal Highland Showground site to the south of the A8 at Norton Park is removed and the site allocated for other uses including residential. There is also a proposal to allocate the 'Crosswinds' runway at Edinburgh Airport for business land and mixed-use development next to the Edinburgh Gateway Interchange. Fife Council has no objection to these proposals. However, it is considered critical that Sustainable Transport Corridors are implemented in conjunction with any proposed development if additional burdens on the bypass, bridgehead and further cross boundary trips are to be avoided.

Increased residential site densities

- 2.10 CEC proposes to increase site densities on both urban and greenfield sites to a minimum of 65 dwellings per hectare and in certain areas, a minimum of 100 dwellings per hectare. Fife Council recognises that high density does not always equate to high rise. Nevertheless, it is important to ensure that a choice is provided in the size of homes and tenure seeking to ensure that within the City Council's area, housing needs are being met. Otherwise, greater pressure will arise in areas surrounding the City, such as Dunfermline. Fife Council note that this intention is set out in Choice 11B of the Choices for City Plan 2030 (weblink under 'Purpose' section of this report). Increasing residential site densities may result in, for instance, the provision of fewer family sized homes in Edinburgh resulting in more pressure for family housing on the housing market in Fife.

Strategic Transport Corridors

- 2.11 It is CEC's intention to create and improve transport connectivity internally and externally to the City as well as the green network infrastructure and active travel routes. CEC proposes two Strategic Transport corridors identified as being suitable for the delivery of new transit-solutions (Bus Rapid Transit and Tram). The identified Sustainable Transport Corridors (Map 3 below) that are likely to have any effect on Fife are 7 (Newbridge) and 8 (West of Hermiston). These are supported by Fife Council, however due to the significant number of commuters and travellers into and out of Edinburgh from Fife Corridor 9 (City Centre to Queensferry), this corridor should also be a focus.



Map 3 City Plan 2030 – Edinburgh Strategic Sustainable Transport Study proposed corridors

- 2.12 CEC previously quoted that in-car commuting into the city accounts for over 60,000 vehicles a day (journey to work/morning peak). Corridor 9 'City Centre to Queensferry' (excluded from Map 3 above) is the most heavily trafficked route in and out of Edinburgh but not included in the suite of corridors under focus. This corridor, and any proposals for it, are clearly of interest to Fife as a significant number of Fifers travel along that route into and out of Edinburgh for work and other activities.

Supporting the reduction of car use in Edinburgh

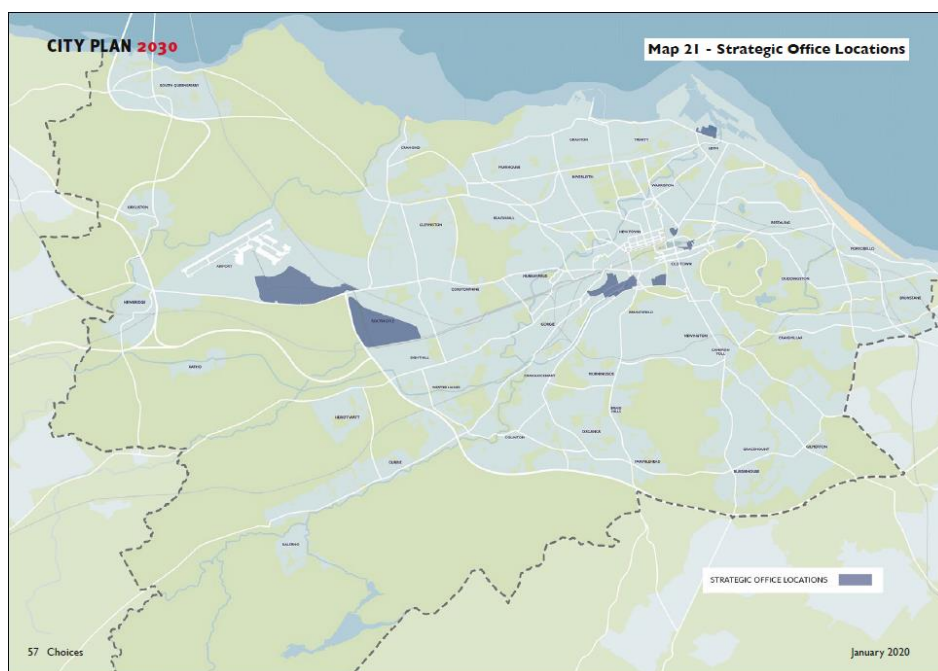
- 2.13 High density city focussed growth on existing and proposed transport, and other infrastructure, will assist in reducing car use and is welcomed by Fife Council. Proximity to the bypass and 'attractiveness' to the international business user cannot be reconciled without a strategic mobility hub/interchange and a strong sustainable corridor. As previously mentioned in this report, CEC's City Mobility Plan 2030 is also being consulted on. This is being considered by Fife Council's Transportation Services. However, there are some Options within the City Plan 2030 MIR consultation that touch on both movement of vehicles and people. Fife

Council encourages the promotion of Ferrytoll Park & Choose (P&C), Rosyth P&C and Halbeath P&C. Rail network improvements with regard to additional capacity would also aid the reduction of car travel into Edinburgh. A strategic regional approach to transport, particularly car movements, is required.

- 2.14 The Mobility Plan states that the Council will expand the tram/mass rapid transport network to the north and south of the city as well as to Newhaven and explore the potential to extend routes to the west of the city and into Fife, West, Mid and East Lothian. They will also support rail capacity increases and high-speed rail as one of the most popular modes of travel into and out of Edinburgh. They will work with operators and with Network Rail towards capacity increases to allow for greater passenger numbers on the Scottish rail network.
- 2.15 The retention of the Forth Road Bridge as a dedicated public transport and active travel route will continue. In addition, there will be investment in strategically placed transport hubs on the edge of the city where public transport (tram, bus, rail, air) can integrate with cars and can make the transition to Electric Vehicles (EV).
- 2.16 The proposals are welcomed and supported by Fife Council. It is imperative that Edinburgh engages with regional authority partners to ensure a modal shift and improved regional transport connectivity. As such Fife Council seeks to engage on all inter-regional connectivity issues where appropriate.

Employment

- 2.17 It is proposed that 275 hectares of employment land is to be delivered through housing led mixed use development. It is CEC's intention to continue to support office use at strategic office locations at Edinburgh Park/South Gyle (Map 4 below), the International Business Gateway, Leith, the city centre, and in town and local centres.



Map 4 City Plan 2030 – Strategic Office Locations

- 2.18 Fife Council has no objection to this approach. However, as Edinburgh is the regional core for south east Scotland, it is essential that CEC engages in a regional collaborative approach to strategic office space provision so neighbouring partner authorities are not negatively impacted.

3.0 Conclusions

- 3.1 The potential impacts on Fife from the implementation of the preferred options in the City of Edinburgh City Plan 2030 MIR relate to residential provision, transport infrastructure and connectivity, and employment with the Fife bridgehead being at risk of being impacted more significantly than the remainder of Fife. The MIR does not provide much detail regarding regional connectivity, however, much of this will be addressed through the ongoing City Mobility Plan and regional growth strategy process.
- 3.2 Residential and other proposed land use development in the West of Edinburgh area of search will have some impact on the bridgehead transport infrastructure and beyond. However, the extent of that impact can only be determined once development sites within that area are identified. Increases in residential site densities may result greater pressure for family housing in areas surrounding the City, such as Dunfermline. This could result in an increase in commuting over the Forth Bridges.
- 3.3 The potential western housing growth, along with other potential land releases or revised employment allocations, are likely to create greater competition between sites in Edinburgh and south Fife as part of the greater Edinburgh housing market area. The Edinburgh growth is likely to impact on the build out rates of housing sites in Fife and could place additional pressure on infrastructure provision and future revenue costs.
- 3.4 Whilst the development of Sustainable Transport Corridors is welcomed, the preference to exclude Corridor 9 (City Centre to Queensferry) for improvement is disappointing. Corridor 9 should be identified for improvement as without this, Fife will be significantly impacted upon. Investment in this corridor presents an opportunity to improve regional connectivity and sustainable transport.
- 3.5 Fife Council has no objection to the formulation of City Plan 2030. It considers it of paramount importance that the transport infrastructure proposed in City Plan 2030 is in place to support the proposed development, particularly west of Edinburgh if significant negative impacts are to be avoided both internally and externally to the City of Edinburgh.
- 3.6 Fife Council broadly supports the preferred options of the MIR, however, there is a requirement for CEC to continue engagement with its neighbouring Local Authorities, including Fife, to ensure successful outcomes for the City and its City region partners.

List of Appendices

- Appendix 1 Fife Council response to CEC Main Issues Report - City Plan 2030

Background Papers

- [City of Edinburgh Council's Local Development Plan \(City Plan 2030\) Main Issues Report](#)
- [Fife Council's Economy, Tourism, Strategic Planning and Transportation Committee on 30th January 2020.](#)

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Appendix 1 – Fife Council response to City of Edinburgh Council Main Issues Report (City Plan 2030)

Choice 1 - Making Edinburgh a sustainable, active and connected city

1A. We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver, this network. Do you agree with this?

- **Fife Council's Response:** Yes, Fife Council supports this. Green networks are vital to delivering sustainability and the wellbeing of residents. Regional collaboration is key in this respect as is the case with all other spatial issues affecting the relationship between Fife and Edinburgh.

1B. We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this?

- **Fife Council's Response:** This is commendable and fully supported by Fife Council. All measures taken to combat climate change, promote active travel and support biodiversity are welcomed.

1C. We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this?

- **Fife Council's Response:** Yes, this is an important element of tackling climate change and addressing the climate emergency.

1D. We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this?

- **Fife Council's Response:** Yes. The acceptability of the change of use from open space to another use is dependent on the end use proposed and alternative existing facilities. Consultation with affected communities is important to ensure quality place making.

1E. We want to introduce a new 'extra-large green space standard' which recognises that as we grow, communities will need access to green spaces more than 5 hectares. Do you agree with this?

- **Fife Council's Response:** Yes. Access to quality green space is paramount to well-being and as such this supported by Fife Council.

1F. We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this?

- **Fife Council's Response:** Self-sufficiency and resilience are becoming more and more important as climate change occurs and food production is affected. New ways of living to counter climate change and preserve the planet for future generations is fundamental. Allotments also help with community development and cohesion and serves the wellbeing agenda.

1G. We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this?

- **Fife Council's Response:** Yes. This is a necessary provision and in recent years there has been an increase in non-traditional burials which this policy would assist in providing.

1H. We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this?

- **Fife Council's Response:** Yes. The maintenance and management of new green spaces have long been an issue. As Local Authority budgets reduce it is important that measures are in place to maintain public green spaces.

Choice 2 – Improving the quality and density of development

2A. We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts.

- **Fife Council's Response:** This is very important. With an aging population and as climate change continues to impact, the adaptability of development is vital.

2B. We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this?

Fife Council's Response: FC recognise that high density does not always equate to high rise. Nevertheless, it is important to ensure that a choice is provided in the size of homes and tenure seeking to ensure that within the City Council's area,

housing needs are being met. Otherwise, greater pressure will arise in areas surrounding the City, such as Dunfermline. Fife Council note that this intention is set out in Choice 11B. Increasing residential site densities may result in, for instance, the provision of fewer family sized homes in Edinburgh resulting in more pressure for family housing on the housing market in Fife. This could result in creating further commuting into Edinburgh.

2C. We want to revise our design and layout policies to ensure their layouts deliver active travel and connectivity links. Do you agree with this?

- **Fife Council's Response:** Yes, active travel is an important facet of wellbeing and healthy lifestyles. It also assists with reducing car usage in the city.

2D. We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this?

- **Fife Council's Response:** Yes, see previous comments regarding the importance of wellbeing and placemaking.

Choice 3 - Delivering carbon neutral buildings

3A. We want all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. Instead we could require new development to meet the bronze, silver or gold standard. Which standard should new development in Edinburgh meet?

- Platinum (zero carbon)
- Gold
- Silver
- Current Building Standards (currently bronze)

Fife Council's Response: The proposal to implement zero carbon/platinum standard for all buildings and conversions is supported. To achieve this Edinburgh will require the Council's planning and building control practices to align which is to be welcomed. Fife Council's equivalent policy is its Low Carbon Supplementary Guidance, Making Fife Places Supplementary Guidance and the Sustainable Energy and Climate Action Plan (SECAP 2020-2030). Fife has similar aspirations in Fife as set out in the aforementioned documents. Although welcomed, raising the bar in Edinburgh might encourage developers who won't meet that standard to move to adjacent Council areas instead.

Choice 4 – Creating Place Briefs and supporting the use of Local Place Plans in our communities

4A. We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this?

- **Fife Council Response:** Yes. The involvement of local communities in the preparation of Place briefs is welcomed. If Place Briefs and Local Place Plans are to be successful, the position understood from Scottish Government Policy is that alignment would be needed between the Local Development Plan and community plans.

4B. We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. How should the Council work with local communities to prepare Local Place Plans

- **Fife Council Response:** Please see response to question 4A.

Choice 5 – Delivering community infrastructure

5A. We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this?

Fife Council's Response: Fife Council fully supports this approach to reduce additional capital and revenue spend. CEC should engage with partner Local Authorities to ensure coordinated transport solutions for car reduction. City Plan 2030 will identify new public transport and road infrastructure improvements based on a Transport Appraisal, and actions arising from the City Mobility Plan. A study examines 10 strategic corridors within, and potentially beyond Edinburgh. Based on the assessment, two corridors have been identified as being suitable for the delivery of new transit-solutions (BRT and Tram). The selected Sustainable Transport Corridors likely to impact on Fife are 7 (Newbridge) and 8 (West of Hermiston). The proposals set out within these corridors require sustainable modes i.e. fast transit within these zones. Fife Council consider it critical that these are implemented in conjunction with proposed development if additional burdens on the bypass, bridgehead and further cross boundary trips are to be avoided.

Towards Newbridge (Route 7) has been identified as being suitable for the delivery of a new transit solution. This route refers to commuters from West

Lothian. Reference should also be made to commuters to and from Fife and the potential for them to link into any proposed Bus Rapid Transit and Tram.

CEC previously quoted that in-car commuting into the city accounts for over 60,000 vehicles a day (journey to work/morning peak). Corridor 9 'City Centre to Queensferry' is the most heavily trafficked route in and out of Edinburgh but not included in the suite of corridors under focus. This corridor, and any proposals for it, are clearly of interest to Fife as a significant number of Fifers travel along that route into and out of Edinburgh for work and other activities.

FC requires CEC to engage with Local Authority partners to ensure coordinated transport solutions for car reduction. City Plan 2030 will identify new public transport and road infrastructure improvements based on a Transport Appraisal, and actions arising from the City Mobility Plan.

The Edinburgh Health and Social Care Partnership will prepare a Primary Healthcare Appraisal as part of preparing the Proposed Plan. Fife Council supports and encourages the approach to align spatial planning with future community health and social care needs.

5B. We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this?

- **Fife Council Response:** Yes. This approach is supported and aids successful placemaking.

5C. We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this?

- **Fife Council Response:** Yes. Again, this approach is supported and aids successful placemaking

5D.1. We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this?

- **Fife Council Response:** Yes appropriate, proportionate, and timeous interventions are essential to delivering any successful development. Early warning of any such developer obligations is essential to allow developers to assess the development economics of a site/development.

5D.2. We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this?

- **Fife Council Response:** It is noted that the current CEC guidance identifies zones for transport, healthcare and education. In addition, it is understood that the CEC LDP Action Programme tracks progress and enables financial planning for the provision of infrastructure within the zones. This is a welcome approach and is consistent with the practice adopted to date by Fife Council.

It is highlighted however that an appraisal should occur of the approaches to planning obligations across the constituent SESplan authorities and of the UK Supreme Court Judgement (Elsick - November 2017). Critically planning obligations must be viewed in the dual context of mitigating impact or providing for 'need' but also in that of proportionality and affordability to ensure development viability.

Currently, the absence of an extant SESplan (SDP2) regional (transport contributions) obligations methodology does place the onus on local authorities including Fife and CEC to adopt local approaches to planning obligations and in turn to prepare costed assessments detailing infrastructure needs from new development.

It is the view of Fife Council that this onus must shift and that Scottish Government or key agencies should support local authorities and partners by progressing, in early course, secondary legislation on Development Planning including proposed national methodologies for the proposed Infrastructure Levy. Practically, CEC could assist by offering the City and existing regional partnership forums as a testbed for the levy including cumulative contribution zones.

In setting of the zones within the CEC authority area, scoping must also occur of potential partnership/s with SEStran or other infrastructure agents to ensure that the areas assessed are appropriate and any consequential strategic effects highlighted. This will avoid CEC establishing contribution zones and costs in isolation from other authorities or regional infrastructure providers.

5E. We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this?

- **Fife Council Response: Yes.** This is consistent with the provisions of the Planning Scotland Act 2019.

Choice 6 – Creating places for people, not cars

6A. We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets

will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this?

- **Fife Council Responses:** Yes. This approach is supported and aids successful placemaking.

6B. We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this?

- **Fife Council Responses:** Yes, however this approach will require to be monitored to gauge effectiveness. Also, a mechanism requires to be in place to review the level of car parking if a previously planned intervention is not delivered.

Choice 7 – Supporting the reduction in car use in Edinburgh

7A. We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this?

- **Fife Council Response:** Whilst Fife Council support the principle of reducing cars within the city centre in particular, we expect technical information to support how this will be managed to ensure that the increased car usage and related pollution is not 'pushed out' beyond the city boundaries into areas of Fife, and other surrounding areas. The Park and Ride/Choose facilities in South Fife encourage alternatives to car travel, and we require to understand in more detail, what impact the City's choices on reducing car travel could have on capacity at these facilities or the need for any new facilities and how these would be funded

In an area with good public transport services, CEC might adopt low maximum parking standards. It is important to set standards that support the right development in the right place rather than unintentionally promoting less sustainable patterns of development. Minimum parking standards could promote low density development. It could be better to have very prescriptive/restrictive maximum parking standards. Setting area/development targets for parking levels to control on-street parking could result in parking migrating to other areas. Could this be used to encourage development in one area over another (in terms of developer costs to provide parking)?

7B. We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this?

- **Fife Council Response:** Yes, for the Council's city centre transformation programme to succeed and to ensure the modal shift from the private car is achieved, the amount of car parking requires to be controlled.

7C. We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this?

- **Fife Council Response:** Yes, as per the answer to question 7B, this is required to ensure the modal shift from the private car to more sustainable alternatives is achieved.

7D. We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this?

- **Fife Council Response:** Agree with the support and safeguarding of sites for new park and ride and extensions. The proposals are welcomed and supported by Fife Council. It is imperative that Edinburgh engages with regional authority partners to ensure a modal shift and improved regional transport connectivity. Fife Council encourages the promotion of Ferrytoll Park & Choose (P&C), Rosyth P&C and Halbeath P&C as part of that collaborative process. Fife Council is currently being consulted on the City Mobility Plan and will comment on this further.

Choice 8 – Delivering new walking and cycling routes

8A. We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this?

- **Fife Council Response:** Yes, the expansion of the existing network through the identification of new routes will help community health and wellbeing. This will further support the modal shift from the private car as sustainable alternatives are provided.

8B. As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this?

- **Fife Council Response:** See question 8A response.

8C. We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this?

- **Fife Council Response:** Yes, Fife Council fully agrees with this and, as previously stated with respect to issues affecting neighbouring local authorities, strongly propose a regional partnership is required to deliver new and improved strategic active travel links. Fife Council is currently being consulted on the City Mobility Plan and will respond in due course.

Choice 9 – Protecting against the loss of Edinburgh’s homes to other uses

9A. We want to consult on designating Edinburgh, or parts of Edinburgh, as a ‘Short Term Let Control Area’ where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach?

- **Fife Council Response:** Yes. Certain parts of the City have a largely transient population due to the high concentration of short term lets. Control of this can create a better balance between short term lets and the resident population and also aid better place making.

9B. We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this?

- **Fife Council Response:** An approach to manage short-term lets/Air BnB is welcomed by Fife Council. The annual Edinburgh International Festival and other events held in Edinburgh throughout the year require flexible accommodation but this should not be at the expense of local residents and people looking for a home. Also see answer to question 9A.

Choice 10 – Ensuring the better use of land

10A. We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations,

helps create sustainable communities and looks after student's wellbeing. Do you agree with this?

- **Fife Council Response:** Yes. This should be developed in conjunction with all Edinburgh's universities and colleges.

10B. We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. On sites over 0.25 hectares coming forward for student housing, hotels and short-stay commercial visitor accommodation, and other commercial business, retail and leisure developments, at least 50% of the site should be provided for housing. The new policy would not apply to land specifically allocated or designated within the plan for a specific use – i.e. business and industry land, safeguarded waste management sites, minerals sites, single school sites, our town and local centres, or sites covered by our office policy. Do you agree with this?

- **Fife Council Response:** As a way to increase the level of housing built within the city, the new policy framework is supported. However, it is not clear how this would be implemented.

10C. We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this?

- **Fife Council Response:** Fife Council welcomes the proposal for mixed use redevelopment where this is appropriate and does not raise any amenity issues.

Choice 11 – Delivering more affordable homes

11A. We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach?

- **Fife Council Response:** The provision of additional affordable homes is supported.

11B. We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this?

- **Fife Council Response:** Fife Council supports this. Mixed house types and tenures help sustain balanced communities and with an aging population, adaptability and choice are paramount to sustainability and meeting the needs

of the population.

Choice 12– Building our new homes and infrastructure

12A. Which option do you support?

- Option 1 (Council/Partners/Urban Area)
- Option 2 (Market/Greenfield)
- Option 3 (Blended approach)

Fife Council Response: Fife Council considers it important to maximise urban growth through suitable brownfield and where this can be delivered within the Plan period. The greenfield approach raises significant concern on the extent of greenfield expansion which would have a greater impact on the housing markets of surrounding areas, such as South Fife. It is considered that this would impact on the ability to make the transformational change that is set out relating to transport choices and climate change actions in particular. Map 9 identifies the potential of releasing greenfield land to deliver considerable expansion to the West of the city around Kirkliston, West Edinburgh, and Calderwood. If all these areas were to be allocated for new homes over the Plan period, Fife Council would have considerable concerns. The option of the blended approach raises similar concerns given that this option should aim to reduce greenfield land release, however this option still identifies the same general locations as per the greenfield option. Fife Council supports Option 1 (Urban Area) - new homes to be delivered by the Council and its partners within the Urban Area.

Choice 13– Supporting inclusive growth, innovation, universities & culture

13A. We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this?

- **Fife Council’s Response:** FC supports this proposal. The Edinburgh and South East Scotland City Region Deal, signed in August 2018, is a mechanism for accelerating sustainable economic and inclusive growth in the City Region through maximising these growth areas. £1.3 billion will be invested across the Innovation, Skills, Transport, Culture and Housing themes over the next 15 years.

Choice 14- Delivering West Edinburgh

14A. We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through ‘an area of search’ which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach?

- **Fife Council’s Response:** The extent of the ‘area of search’ at West Edinburgh is expansive, and as such is more difficult to make comment on. Fife Council would have concerns if the expansion of West Edinburgh was of significant scale. We would like ongoing discussions with the City Council and other South East Scotland City Region Authorities over the extent of expansion before the Proposed Plan is developed.

14B. We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach?

- **Fife Council’s Response:** It is proposed that the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park is removed and the site allocated for other uses including residential. Being on the West of Edinburgh this could potentially have significant impacts for Fife. As per 14A, we would like ongoing discussions with the City Council and other South East Scotland City Region Authorities over the extent of development before the Proposed Plan is developed.

14C. We want City Plan 2030 to allocate the Airport’s contingency runway, the “crosswinds runway” for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach?

- **Fife Council’s Response:** Fife Council has no objection to the Royal Highland Showground or Crosswinds Runway proposals. However, it is considered critical that Sustainable Transport Corridors are implemented in conjunction with any proposed development if additional burdens on the bypass, bridgehead and further cross boundary trips are to be avoided.

Choice 15 – Protecting our city centre, town and local centres

15A. We want to continue to use the national ‘town centre first’ approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east

Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this?

- **Fife Council's Response:** Yes. The role of town centres has changed and continues to change. Edinburgh is clearly the regional core for south east Scotland and as such the city centre has a clear and important role to play in enhancing and protecting this status. For this to be successful the appropriate transport infrastructure must be in place both locally and regionally.

15B. New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree?

- **Fife Council's Response:** Yes. This approach will protect and strengthen the existing centres.

15C. We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree?

- **Fife Council's Response:** Yes, see response 15B.

15D. We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support?

The use of Supplementary Guidance

Retail guidance in the plan

- **Fife Council's Response:** The use of supplementary guidance could be more flexible as it would allow guidance to respond to trends and challenges outwith the 10-year LDP review cycle.

15E. We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach?

- **Fife Council's Response:** Yes. This will encourage visitors to use the City's extensive public transport network.

15F. We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand. Do you agree with this approach?

- **Fife Council's Response: Support this to a degree.** As previously mentioned, the role of the town centre has changed and is continuing to change as attitudes and behaviour evolve to shopping and associated experiences. A variety of uses, i.e. not just retail, in town centres will help their vitality and define their new role/function.

Choice 16 (part 1) – Delivering office floorspace

16A.1. We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree?

- **Fife Council's Response:** Fife Council has no objection to this. However, as Edinburgh is the regional core for south east Scotland it is essential that CEC engages in a regional collaborative approach to strategic office space provision so neighbouring partner authorities are not negatively impacted.

16A.2. We want to support office development at commercial centres as these also provide accessible locations.

- **Fife Council's Response:** Fife Council has objection to this as long as any development is supported by appropriate transport infrastructure. If it is to be located on the west side of Edinburgh, consideration must be given to cross boundary travel in consultation with partner authorities.

16A.3. We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree?

- **Fife Council's Response:** Fife Council supports this. All development must be supported by appropriate transport and active travel infrastructure. Locating space in the city centre would make use of existing good public transport links and would benefit from any proposed new/improved infrastructure.

16A.4. We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree?

- **Fife Council's Response:** Yes, this would seem a sensible approach.

16A.5. We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree?

- **Fife Council's Response:** Yes, as long as locations are accessible and provide travel alternatives to the private car.

16B. We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this?

- **Fife Council's Response:** See previous responses in this section.

16C. We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could introduce a 'loss of office' policy only in the city centre.

Supports a loss of office policy city-wide
 Supports a loss of office policy in the city centre
 Supports no change to policy

- **Fife Council's Response:** Fife Council supports a loss of office policy city-wide to ensure the retention of existing office space throughout the city in a variety of accessible locations.

Choice 16 (part 2) – Delivering business and Industrial Space

16E. We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree?

Leith Strategic Business Centre
 Newbridge
 Newcraighall Industrial Estate
 The Crosswinds Runway

- **Fife Council's Response:** Fife Council has no comment to make on the individual locations. However, any location for new for business and industrial use should be in an accessible location.

16F. We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree?

- **Fife Council's Response:** Yes. This is essential to ensure delivery.

16G. We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree?

- **Fife Council's Response:** Yes. This is required to ensure the retention of existing industrial estates throughout the city in a variety of accessible locations.

16H. We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree?

- **Fife Council's Response:** Yes. This would go some way, in conjunction with other proposed measures, to reduce vehicle emissions in the city and meet the challenge of the climate emergency.