



28 September 2015

## SESplan2 Main Issues Report

### Response from the Cockburn Association

#### Question 1: The Vision

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We are in favour of the preferred option, but suggest the following amendments:

Vision Line 1: What does 'sustainable area' mean? If it is intended to reflect the original Brundlandt definition of sustainable development, we are content e.g. *'At a minimum, sustainable development must not endanger the natural systems that support life on earth: the atmosphere, the water, the soils and the living beings'*

If this is not the meaning, we suggest the inclusion of 'sustainable' is misleading and should be deleted.

Vision Line 4: If 'development' is intended to be 'sustainable', then, for the avoidance of doubt, insert 'sustainable' before 'development'

Vision Line 4: The quality of design and climate change should be mentioned.

Vision Lines 1 - 5: To include a reference to design and climate change and to underpin the principles of sustainability, we recommend the vision is restructured as shown below:

"The South East Scotland region is a thriving, successful and (sustainable) area in which all forms of deprivation and inequality are reduced; *climate change ambitions are exceeded*; and is internationally recognised as outstanding for its cultural and landscape value and as an area to live, work and do business. We will build on the strengths of all parts of the region and identify opportunities for growth and *sustainable development, based on high quality design. This will not endanger the natural and built environment and will also conserve and enhance their values*"

We believe such an amended vision better reflects the issues raised in Chapters 2 – 6 of the MIR

#### Question 2: A Strategy for Edinburgh and South East Scotland

Do you support:

- Alternative Option 1 Concentrated Growth ( 2.2);
- Alternative Option 2 Distributed Growth (fig 2.3);
- Preferred Option 3 Growth Corridors (fig 2.4); or
- None of the Options.

Please explain your answer. You may also suggest any changes.

Our main concerns regarding this strategy are:

Scottish Government (SG) policies that strongly emphasise growth and the Edinburgh City Region as being the 'driver of Scotland's economy'. In our view, this over emphasis upon growth jeopardises the effective implementation of environmental policies and the related quality of life for people.

We also question the emphasis on the Edinburgh City Region as a focus for economic growth and regeneration in Scotland. We recognise that Edinburgh has many assets, for example, its higher education and levels of qualified manpower, and that there is considerable emphasis internationally on the role of cities in economic growth. One recent

report, for example, referred to a “new global picture of growth”, which “is about the rise of cities, the concentration of productivity, innovation and creativity” (Royal Society of Arts, City Growth Commission, 2014). The population of the Edinburgh City Region, however, at slightly over 1 million is small compared with London, the West Midlands and the proposed “Northern Powerhouse”, and by international standards (for example, major US, European and Asian cities, Hong Kong, Singapore). It is unlikely that the “agglomeration effects” which drive investment, productivity and growth in genuinely global-scale city regions would apply to a city the size of Edinburgh. Hence, we believe it is essential that growth and investment are spread and driven across Scotland, rather than concentrated in the already overcrowded south east city region, with its relatively fragile urban and natural environment, and acute shortage of suitable land for development and housing without causing unacceptable environmental damage.

The HNDA is relied on heavily as a quasi-scientific calculation. Although lengthy and seemingly complex, in essence it is a projection of population and household formation. This is a projection only. Household formation in particular is affected by the economic and social context. It is predicted to be down on the previous (2010) projection. As the MIR says this is probably down to a combination of the lingering effects of the recession on earnings, and tighter mortgage requirements, making house purchase more difficult. However this does illustrate the difficulty of projection.

- Much of the HNDA tackles the issue of affordability and the crucial message is that the major ‘need’ is for affordable housing. As stated below, there is little evidence from anywhere that simply building more houses brings down prices as the housing market does not perform as other markets do. Even less is there evidence that allocating large areas of land for housing (which is not the same as seeing it actually used) will assist with affordability.
- The HNDA makes it clear that the biggest need is for social rent. The HNDA states that of the 114,876 households with current and future need (on the Steady Recovery 2 Scenario) 52% would need Social Rent and 13% below market rent, both requiring subsidy. Merely releasing more land is not going to create more homes for social rent. On current spending and outcomes there is a real problem in meeting this need. For example in Edinburgh in 2013/14 of the c.1400 new ‘affordable’ homes (a high total in recent years), only a quarter were for social rent. A few years ago, the Scottish Government reduced subsidy levels to housing associations to try to get more homes built, but it had to increase subsidy levels again, because it had the opposite effect.

If the Government is serious about meeting housing need, it has to review how that is subsidised and increase investment. If investment is not increased substantially, the homes needed will not be built - so why have land declared free for building? The subsidy and the release of land need to be planned in tandem. In preparing SESplan2, it is important to review what land would be available to build affordable homes, which is already available and not built on, and at other means of providing affordable homes, for example, sourcing funds to enable public procurement of affordable and ‘shelter’ housing, including purchase of former council homes.

The HNDA forecasts of population growth and their resulting land requirements for housing includes a significant element of net migration of uncertain accuracy. Moreover, it is unclear why 44% of the total allocation of net migration to Scotland by the ONS is allocated to Edinburgh? The SG can influence where jobs are created and the allocation of net migration and associated wealth creation should be distributed more equitably to appropriate parts of Scotland. Also unclear is the amount of brownfield land proposed for use, relative to the total stock of such land. Because the application of the conclusions of the HNDA process have such profound and long lasting effects upon the environment and the quality of life of people, we consider that its validation should be carried out by an appropriate body, clearly independent of government.

The SG emphasis upon a generous allocation of land for housing requiring a 10 -20% addition to the forecasts exacerbates the pressure upon green land. The dangers of an oversupply of houses should not be underestimated, as manifest in Ireland and Spain.

Experience of the housing market raises doubts about whether normal demand/supply principles apply? The notion that building more houses will bring down prices and hence facilitate affordability is flawed. Allowing development in the Green Belt will tend to create windfall gains in land values which will accrue to landowners and developers, and amenity benefits to house purchasers, at the expense of losses in amenity to the wider community and in public value. It is in the interests of developers to adjust their build rates in order to maintain/increase house prices and their profit margins. This practice is exacerbated by seeking a 25 year land supply. All this contributes to ‘land-banking’ by developers, which must be actively discouraged.

The Guardian newspaper has published an interesting article on this subject:

<http://www.theguardian.com/uk-news/davehillblog/2014/mar/02/london-housing-crisis-landbanking>

Green Belt development also generally fails to increase the supply of affordable housing where the main pressures and shortage lie. It would be in the interest of the wider community and public, and of maintaining an attractive and sustainable urban environment, to ensure that we maximize development on brownfield land within the existing urban area.

Both Options 1 and 3 will destroy the Edinburgh Green Belt and all its attendant values. The strategic aspiration 'maintaining and enhancing the area's high quality environment and quality of life' will not be achievable. Moreover, the degree of protection for the Green Belt residue is not specified. Should one of these options be agreed, a mechanism must be implemented to protect green belt residue in perpetuity. Only that will encourage land owners to manage the land and discourage land blight. Without this, uncertainty will continue and, as apparent in recent decades, this can lead to land being poorly maintained, sometimes even to the extent that its eventual loss as 'green belt' goes unnoticed.

Concentrating growth along transport corridors is a return to the long discredited 'ribbon development'. Achieving satisfactory 'high quality of place' within linear developments would be very difficult.

Hence, we favour 'None of these Options', for the reasons outlined above. Our recent pilot survey of a sample of Edinburgh citizens strongly supports many of these views.

The MIR must explain whether or not bids for 'Accelerated Growth' funding will affect the present options for growth i.e. 'concentrated, distributed or corridors'

A robust response should be given to the SG that their growth policies for the Edinburgh City Region cannot be delivered as it would severely jeopardise the effective implementation of other important environmental and quality of life aspirations for the region.

There remains the question of how towns and cities should expand in balance with their natural and cultural heritage, reflecting the aspirations of their citizens and the achievement of high quality places with a distinctive identity. History offers ideas of how this might be done - James Craig in 1768 created Edinburgh's New Town, now part of a WHS; Ebenezer Howard in 1903 Letchworth Garden City, combining the best of urban and country living; Brasilia and others. Edinburgh also has a unique geological and geographic setting, and urban and cultural history, which is at risk of serious damage from excessive development.

How Edinburgh should expand to reflect these values is an important social and multi-disciplinary debate that needs to be commenced by the CEC as a matter of urgency e.g. topics such as;

- Allocation of a fairer proportion of Scotland's estimated future growth to the SESplan region
- Determination of the optimum size of Edinburgh by consulting the views of its citizens
- How can the city expand to this size in a balanced and holistic way based on principles of true sustainable development?
- Development of new satellite towns in the SESplan region, based on principles of true sustainable development, located on lower quality agricultural land and with good communication links to the city
- Other scenarios...

We do not think 'growth corridors' are the answer. The Capital City's outstanding natural and cultural heritage and that of the SESplan region deserve better!

### **Question 3: Principles for Development**

Do you support the principles for development? Please explain your answer. You may also suggest any changes, including other principles for development.

In general, we support the principles for development, but have the following comments:

**Bullet 1: Conserve and enhance the natural and built environment;** as Options for growth 1) and 3) will severely damage/erode the Green Belt, the 'natural' element of this principle will be severely curtailed and this principle is misleading, unless there is some further clarification. We hope that conserving and enhancing the 'built' element will be robustly adhered to.

**Bullet 2: Address climate change through mitigation and adaptation;** much of the proposed SDAs contain prime agricultural land. Stronger and long term protection should be given to prime agricultural land needed for home grown food production in the event of climate change adversely affecting food imports. The UK currently imports c. 40% of its food requirements. Also more emphasis should be given to tree and shrub planting that can sequester carbon from the atmosphere.

**Bullet 3: Locate new development to maximise accessibility to employment and services;** for consistency with other bullets, suggest 'optimise' rather than 'maximise' is used.

**Bullet 5: Promote the development of brownfield land for appropriate uses;** this key principle to reduce erosion of the Green Belt and green spaces requires strengthening. A system must be devised to direct and incentivise the use of brownfield land for development. Also the strict, high priority given to the achievement of housing targets within the plan period appears to act as a disincentive to including substantial areas of brownfield, because of uncertainty about its availability. Hence, brownfield appears to be mixed with green land as an insurance to meeting targets. But releasing more land for development in the green belt or on green open space within the city, acts as a disincentive to greater use of brownfield sites. An easing of the 'deliverability' priority could prompt confidence in the use of a greater amount of brownfield in the housing target mix? It is essential that green land should only be used for development that cannot be accommodated on brown land.

**Additional bullet:** promote high density development with good urban design.

**Bullet 6: Ensure new development is sensitive to the form and layout of existing settlements;** if development is located on green land, new development must also respect the intrinsic landscape and open space qualities of such areas.

**Additional bullet:** seek creativity in all developments and require the implementation of high quality design for all projects. This will support the requirement set out in Question 4.

#### **Question 4: Delivering High Quality Places**

Do you support the above approach to direct LDPs to deliver high quality places? Please explain your answer. You may also suggest any changes, including other factors to be considered.

We support the proposed approach

#### **Question 5: Locations of significant business clusters**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Preferred Option, although there does not appear to be a great deal of difference between the options. However, we consider the number and location of these clusters to be somewhat aspirational and should be closely monitored, so they do not prevent/inhibit opportunities for other uses e.g. housing.

It is important that the locations of business clusters do (as stated) "promote the conservation and enhance the natural and built environment and the 'quality of place'". It is also important to allow (as stated) the provision of housing within the business cluster where appropriate and in particular to ensure that allocation of land for business development does not crowd out potential housing development on brown field sites which may have the potential to bring greater economic and social benefit to the city. Compulsory purchase of suitable brownfield sites which have good quality transport links for affordable housing development at Edinburgh Waterfront is an option which should be considered and provided for in the range of SESplan options. See also our comment regarding long term empty offices at Question 10.

We suggest that the Business Cluster at Edinburgh Airport should be an exception. Airport expansion and emphasis on tourism through this route increases noise pollution which is incompatible with housing development.

#### **Question 6: The Visitor Economy**

Do you support the preferred option? Please explain your answer. You may also suggest any changes.

We support the Preferred Option.

- The key priority should be to safeguard existing cultural and historic sites and assets, especially in and around Edinburgh, and to prevent excessive development which undermines the value and quality of these assets, and brings limited or no economic benefit in an already crowded and highly developed urban environment.
- Development where it occurs should not detract from the natural environment, but add interest to it.
- The Forth crossing with a WHS and three outstanding bridges of different designs has the potential to become a major tourist attraction. A re-instatement of the old car ferry between South & North Queensferry, as 'a scenic route', could add to the heritage interest of this area.
- Viewing good quality scenery is also an important attraction for tourists, as for local people, and must be protected against inappropriate and unsightly developments. Existing eyesores should be removed.
- Encourage the spread of cultural interests throughout the area e.g. create networks of Robert Louis Stevenson's heritage throughout Edinburgh to disperse tourist interests in the city, as for Sir Walter Scott and others.

### Question 7: Wind Energy

Do you support the preferred option? Please explain your answer. You may also suggest any changes.

We support the approach being taken to seek a balance between the requirements of windfarms and those of the environment and community sensitivities. But this balance will not be achieved if maximum energy capacity is sought – ‘optimum’ is a more suitable noun. The formation of a spatial strategy for the location of windfarms that minimises their impacts is welcomed as is the proposal to identify broad cross-boundary areas where cumulative impacts from the siting of turbines may occur.

However, the advent of larger turbines for the ‘repowering’ of windfarms, possibly exceeding 200m, is very disturbing. In these circumstances, we believe the provisions in the National Park (Scotland) Act 2006 9(6) – “*where there is conflict between natural and cultural heritage and development, greater weight in decision making should be given to the former*” should be applied.

We consider there should be proposals to trial designs for ‘exemplar windfarms’ in different landscapes to minimise their impacts e.g.

- Informal turbine layouts that reflect natural landforms, rather than formal, geometric layouts.
- Variation in turbine size with elevation – larger at lower elevations, smaller at higher elevations, especially on skylines.
- Variation in colour of turbines – local vegetation colours against a landscape background, lighter, cloud, colours against a sky background.
- Connecting powerlines to be sited to minimise their impacts.
- Road and fence alignments to be sinuous and reflect landforms, rather than geometric.
- All structures to be designed to minimise their impacts.

### Question 8: Resource Extraction

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Alternative Option. This seem to be in line with current practice to identify indicative areas for different purposes e.g. wind energy, afforestation, protection of wildland. Conversely, it would be helpful for SESplan to indicate areas where there should definitely NOT be fracking or unconventional gas extraction. We note that there continue to be significant concerns about the adverse environmental impacts of aspects of the fracking operation.

### Question 9: Waste

Do you support the emerging content of SDP2 relating to waste? Please explain your answer. You may also suggest any changes.

We support the emerging content of SDP2 relating to waste.

### Question 10: Housing Land across the SESplan Area

As the basis for deriving the housing supply targets and housing land requirements within SDP2, do you support the:

- Preferred Option 1 Steady Economic Growth;
- Alternative Option 2 Increasing Economic Activity with more High and Low Skilled Jobs;
- Alternative Option 3 Strong Economic Growth; or
- None of the Options

Please explain your answer. You may also suggest any changes.

Should SDP2 consider housing land supply targets that are lower than the housing need and demand estimates? Please explain your answer.

Although Option 1 is preferable to Options 2 and 3, we support ‘None of these Options’, because we believe that the housing land targets should be set lower than the HNDA estimates.

We consider that none of the options 1, 2 or 3 could deliver key elements of the required framework ([Monitoring SDP1](#) and [the Considerations and Challenges for SDP2](#)) e.g.

- “Delivers balanced, well designed, sustainable communities where people can access high quality amenities and services”;

- “Values green infrastructure and protects and enhances that asset for future generations”

It is important to deal with the following concerns:

- The over emphasis upon economic growth in NPF3 is likely to adversely affect the application of environmental policies. More weight must be given to natural and cultural heritage issues, in order to achieve a balance between these and growth. It is important to promote growth that is carbon-neutral and respects the natural environment
- The population forecast for Edinburgh includes a large allocation of net migration, which contains a significant degree of uncertainty. Why is 44% of the total ONS allocation of net migration to Scotland settled in the SESPlan area? Projecting migration and population trends, based on this share, creates the risk of systematic error which will grow over time, and will lead to significant over-estimation of housing and development land needs. This is potentially damaging to the environment and countryside of South East Scotland, and could lead to unnecessary intrusion and damage to the Green Belt. Could this be distributed more fairly to other appropriate parts of Scotland especially where there is population decline? Scotland is in danger of making the same mistake as England with the over-heating of the economy in the South East corner of the country to the disadvantage of the rest.
- The National Records of Scotland assemble the statistics for population and households, but their experts indicate that their projections are just that ... mere estimations. And, over the longer range of 25-30 years, their figures are unlikely to be accurate. We consider forecasts for population should be confined to more accurate 5 year intervals with less accurate long term assessments limited to 10 years. It then follows that land allocated for housing should also be allocated on a five year basis.
- The HNDA assessments are voluminous and complex. The methodology and results are written in a way that is very difficult for lay people/communities to understand and to offer meaningful comment in their representations on this key issue. Further, it is noted that much of the length and apparent complexity of this document is due to the different scenarios outlined, although the differences between them are not great. A simple guide to the understanding of HNDA needs to be produced or funds provided to enable communities to commission consultants to advise them on the validity of the HNDA and its outcomes.
- Over the last decade universities throughout the UK have expanded hugely and student numbers are set to increase even further in the foreseeable future. A recent survey by the City of Edinburgh Council reported an increase of more than 20% in student numbers in Edinburgh's universities in the last decade. This estimation is difficult, as it is not easy to measure the churn of students as the final year find employment and a new first year appear. The assessment of the housing needs of students is also complex. Improved data is needed on this issue to inform population forecast as simply adding the total estimated student numbers to population forecasts is likely to give flawed results.
- The amount of brownfield land (relative to the total stock) included in the assessment is not clear. Nor is it clear what measures are being taken to maximise the use of brownfield land in preference to green land. As mentioned previously, the more greenfield and open space land in the city is released for development, the less likely it is that brownfield sites in the city will be developed. Brownfield sites need to be re-developed to keep city/town centres vibrant. This urgently needs to be addressed. Moreover, stating a 'preference' in the MIR for using brownfield land makes little impact when Councils are constantly dealing with development applications for greenfield and greenbelt sites. Even where a Council refuses such applications on the grounds that there are unused brownfield sites in the area, appeals by developers against these refusals are often successful. It is crucial that the rules relating to this issue are strengthened.
- The assessment for office development requirements should be reviewed. Offices clearly unoccupied and surplus to original requirements for more than 5 years should be considered for conversion to housing. If the housing crisis is as bad as is claimed to be, consideration should be given to turning more empty offices into affordable housing.
- The amount of unoccupied/partially occupied housing and the measures proposed to use this resource effectively is unclear.
- The future size of Edinburgh is an important issue for the inhabitants of the SESPlan area, especially the citizens of the City. We do not believe individual citizens have been given a proper opportunity to express their views on this matter. There is a democratic deficit in this regard. It is important that this deficit is addressed quickly by an independent poll that includes a question about the impact of city expansion on the quality of life of citizens.

### Question 11: Housing Land in Edinburgh

Do you support:

- Alternative Option 1 All Housing Need and Demand;
- Preferred Option 2 Significant Proportion of Need and Demand;
- Alternative Option 3 Lower Level of Need and Demand than Options 1 or 2; or
- None of the Options

Please explain your answer. You may also suggest any changes.

We support Alternative Option 3, for reasons outlined in our response to Question 10.

However, we suggest the adoption of the following alternative approach for the allocation of housing land for Edinburgh.

Currently, Edinburgh is dealing with a population increase of 5000 people per annum comprising 1500 natural growth (more births than deaths) and a migration figure of 3500; all figures are approximate, but NRS verified. The migration figure accounts for those moving to Edinburgh from all parts of Scotland, all other parts of the UK and from abroad.

#### Issue 1:

Edinburgh claims it can provide 75% of an effective land supply on brownfield sites alone.

#### Issue 2:

The natural growth is a given and, to some extent, the migration figure is somewhat arbitrary. It could be allocated to other regions of Scotland, but is being driven by Scottish Government economic policies.

#### Issue 3:

A solution could be obtained, reducing the migration by 33% to 2250, a reduction of 1250.

The population increase in Edinburgh would then be  $1500+2250 = 3750$  and  $3750/5000$  is 75%.

#### Result:

Edinburgh could then justify an effective land supply based solely on brownfield sites. Advantages of such an approach could be significant – Green Belt retained, green spaces within the city preserved and a re-generation of brownfield sites where infra-structure is already in place.

#### Background:

Between the census years of 1991 and 2001 Edinburgh grew at a rate of approximately 1000 people per annum. Then, between 2001 and 2011 the rate more than doubled giving a population increase of 2500 per annum in that decade. The population of Edinburgh in 2011 was close to what it had been in the mid-1970s. Edinburgh housed its population in the 1970s so why did it need new build to cope with the same population?

This suggests that occupancy rate went down or, put another way, people lived in more space in 2011 than in the 1970s. Part of the explanation may also be that pensioners, unlike previous generations, are mostly own their homes outright. Financial necessity does not drive people to downsize. Older people can now occupy sheltered housing far more than 30/40 years ago. The emphasis on independent living as long as possible means that more people are being actively encouraged to stay put. This is not just because it is less expensive but because it is broadly felt to be better for people's wellbeing. Hence, the lack of incentive for older people to downsize may be creating a greater demand for family sized housing and driving some of the need for new build of this size – but family sized new build tends to be very expensive and there remains the issue of the affordability/accessibility of such housing for younger families.

It is important that SESplan looks more closely at demographics as well as numbers to guide what types of new build should be encouraged and its affordability for different categories of people. More research is urgently needed on this issue, including the use of subsidies to facilitate affordable build. SESplan should give clear guidance to local plans that encourages the use of holistic briefs/master plans for development that also includes specifications (not just developer's predilections for 1/2 bed flats) and targets for family housing across all tenures such as the CEC development brief for Leith Docks when this was proposed for housing development.

However, from 2011 Edinburgh has been coping with a perceived population increase, which has doubled again this time to 5000 people per annum (the figure used in the calculation above).

### Question 12: A Generous Supply

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

If you support the alternative option, what range should the generosity allowance be set at?

The SPP emphasis upon a generous allocation of land for housing requiring a 10 -20% addition to the forecasts exacerbates the pressure upon green land. This extra allocation of land has to be found in the LDP and, if not used, can contribute to land use blight. The consequences of an oversupply of houses should not be underestimated, as manifest recently in Ireland and Spain.

But the SPP sets out that the exact margin for generosity will depend on local circumstances. Hence, we support the principle of flexibility implied by the Alternative Option to set a range for the generosity allowance, within the overall housing supply target to establish the housing land requirement, depending on local circumstances as justified by the LDP. Such an allowance could be set below 10% where housing land supply is perceived to be robust or above where the rate of completions can be shown to be deliverable.

### Question 13: Affordable Housing

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

What should the minimum provision for affordable housing on market led sites be set at?

What should the requirement for affordable housing be set at within the overall housing supply target? Please explain your answer.

If the current demand for affordable housing is c.64%, this level of demand is not being addressed in the Preferred Option, which is likely to result in a significant shortfall of affordable housing.

Hence, we support the Alternative Option. We suggest this specifies that LDPs will have the flexibility to vary the affordable housing requirement significantly above 25%, where there is a clear justification to meet local needs. We also recommend that the procedures for implementing the affordable housing requirement on development sites are tightened up to ensure that specified targets are met by developers e.g. we are concerned that section 75 agreements (including for student housing) are frequently set aside at a later date at the request of the developer. This practice must stop unless exceptional circumstances apply.

### Question 14: Setting Housing Targets and Requirements

To derive the housing supply target and housing requirements across the SESplan area, SDP2 will consider a range of factors including economic, environmental and infrastructure opportunities and constraints.

- What factors should SDP2 consider and why? Is there another approach that SDP2 should consider?

We consider that SDP2 must assess all the factors outlined above and also those outlined in our response to Question 10

SPP requires that housing supply targets and requirements are set for the SESplan area, each of the six LDP areas and for each functional housing market area. An assessment of housing market areas identified that the influence of the City of Edinburgh in terms of house sales extended well beyond its administrative boundaries. The functional housing market area was therefore defined as the SESplan area in its entirety, with fifteen 'sub housing markets' operating within it.

Should SDP2 set housing supply targets at the level

- Directed by SPP; or
- Directed by SPP and the Sub-housing Market Area level?
- 

Please explain your response. You may also suggest any changes, including alternative approaches

We support the 2<sup>nd</sup> bullet, for the reasons given. As mentioned previously, we stress that housing targets must reflect the type of need which has been identified – with the emphasis on affordability.



### **Question 15: Town Centres**

Are there specific actions that SESPlan should take to support strategic centres and Edinburgh city centre?

We support the Town Centre Action Plan and the outline of the measures it contains. It is important to emphasise;

- the provision of good public transport facilities
- adequate car parking, incorporating generous tree/shrub planting to sequester carbon and to enhance the amenities of the area

Care needs to be taken to ensure that the sequential approach (“1. Town Centre; 2. Edge of Centre; ...”) is not used by developers to place large developments in the ‘edge of centre’, which can take business away from the town centre and make local shops unviable. “Edge of centre” often contains important areas of green space which can be attractive for development and thereby placed at risk of loss/damage.

Are there other centres that SDP2 should identify as strategic town centres?

Should SDP2 seek to identify a hierarchy below strategic town centres?

It is helpful that LDPs will be directed to identify a network of other town and commercial centres, which are of local significance.

### **Question 16: Strategic Green Networks**

Do you support the preferred option, the alternative option or none of the options? Please explain your answer. You may also suggest any changes.

In principle we agree with the concepts for green networks, which includes the Edinburgh Green Belt as clearly a most important asset. But the policy is seriously flawed, due to the serious erosion/destruction of the Green Belt proposed by the preferred development option of growth corridors. Arguably, the proposal for green networks could be construed as misleading, as it purports to suggest that all will be well with the environmental assets (greenbelt/countryside) around settlements, whereas these are likely to be seriously degraded by ‘sustainable growth’. What does sustainable growth mean?

Hence we have no choice but to support ‘None of these Options’. However, we would support green networks that retain substantial areas of green belt/countryside (all aspects) around settlements and that these are robustly protected. In short, the green network areas that could occur if the option of Distributed Growth around Scotland were to be adopted. See our responses to Questions 2 and 10. (NB: We consider green networks may be a more relevant local issue than a strategic one?)

Do the SESPlan green network themes and aims capture the key issues for green network development in the area?

In principle, yes, but effective provision must be made for the incorporation and safeguard of the Edinburgh Green Belt and key countryside areas around other settlements.

Does the map of proposed regional green network priority areas identify the appropriate areas to focus on? Are any priority areas missing from Figure 4.2? If so, which areas should be added and why?

The main areas missing are the Edinburgh Green Belt and countryside areas around settlements. Although Fig 4.27 is intended to be illustrative, it nevertheless conveys a misleading impression of the extent of the networks, which in reality will tend to be linear features.

### **Question 17: LDP Transport Policy Direction**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Preferred Option for the reasons outlined in Issue K

Should SDP2 set out housing density requirements for large developments to promote sustainable transport, walking and cycling?

We agree that SDP2 should specify higher housing densities (4/5 stories) in settlements and on brownfield sites with good urban design. Creative solutions should be encouraged to identify different ways of achieving higher densities other than just ‘blocks of flats’.

### **Question 18: Regional Walking & Cycling Network**

Have the correct routes to be developed as regional routes been identified in Figure 5.2 (Regional Walking & Cycling Network)?

Are any routes missing? Should routes be removed? If so, please indicate which routes and why they should be included or removed.

Designating/constructing the network is important, but so is its future management both in terms of maintenance and guidance for users, especially if these are diverse on particular routes e.g. walkers, walkers with dogs/children, joggers, cyclists, horse riders – the Water of Leith Walkway in Edinburgh is a good example where all of these activities can occur at the same time. Conflicts can and do occur and the risk of accidents is significant, especially the silent approach by cyclists, who do not use their warning bells. A code of behavior for users on such multiple activity routes is needed e.g. the Highway Code contains a cyclist section, but gives inadequate guidance on the fitting and use of bells and on behaviour on 'unsegregated' routes. Many cyclists move at high speeds and do not slow up when encountering pedestrians. Dogs and children do not behave predictably and much more needs to be done to restrict cycling speeds on multiple use routes.

### **Question 19: Prioritising Strategic Transport Infrastructure**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Preferred Option.

What transport priorities should be identified and how should transport infrastructure be prioritised? Please indicate any other strategic interventions which you consider should be included in Table 5.

Without prejudice to our view regarding the need to continue to prioritise the use of public transport systems that minimise carbon emissions, we suggest the following transport priorities that include urgent and necessary road improvements, which will also benefit private vehicle use:

- Install transport and other infrastructure prior to developments wherever possible
- Edinburgh tram extension to Leith and Granton in order to underpin the viability of this phase of the tram operation
- A720 improvements, especially M8 junction, which frequently becomes congested
- A720 improvements, especially A8 junction, which frequently becomes congested
- A720 improvements, especially Sheriffhall junction, which frequently becomes congested (NB: all the above A720 improvements to be undertaken with minimal land take from Edinburgh Green Belt)

We offer the following comments:

- Improved roads begat more vehicles/traffic. In this respect, it would be prudent to review whether or not the present arrangements for the Forth road crossings are likely to be the most effective over time e.g. using both road bridges to carry all traffic may become necessary – suspension bridge for north bound traffic and cable-stay for southbound?
- It is not clear what the Edinburgh orbital bus route entails – we would be concerned if this involves widening and further losses to the green belt? Will the orbital route connect with other bus interchanges within the city, especially to improve bus links between city edge housing and employment locations within the city?
- The design of Park & Ride facilities needs to be improved to reflect their rural locations with a significant increase in tree/shrub planting for screening and climate change mitigation (carbon sequestration)
- It would be prudent to monitor the practicality and viability of ground feed power systems for the tram operation so that expansion of the operation may consider this low visual impact option.
- In Edinburgh the quality of road surfaces continues to be poor on many routes. Somehow, resources for road maintenance must be increased, based on objective, technical criteria for the prioritisation of work.

### **Question 20: Infrastructure Delivery**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Preferred Option for the reasons outlined in Issue M.

Should such a fund be established at the SESplan level, to maximise economies of scale and leverage, or piloted first in an individual SDA or growth corridor?

Established at SESplan level.

Where should the balance lie between public funding and contributions from development and how can risks be equitably shared between sectors?

Any changes in developer contributions should be phased in gradually.

Should a new system of developer contributions be introduced which, within the current legislation, enables contributions to fund measures which are needed to implement the strategy but may not be directly related to an individual development's impact.

Introduce such a new system. However as indicated in our response to Question 19, it is important to install transport and other infrastructure prior to developments wherever possible.

#### **Question 21: Funding Transport - Developer Obligations**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Preferred Option for reasons outlined in Issue N

Should financial contributions be sought from development towards improvements on the trunk road network? Given the lack of capital funding available to deliver transport infrastructure, are there any alternative solutions?

Yes, where developments are deemed to increase traffic flows/congestion that require improvement to the trunk road network.

#### **Question 22: Assessing the Five Year Effective Land Supply**

Do you support the preferred option, alternative option or none of the options? Please explain your answer. You may also suggest any changes.

We support the Preferred Option, but greater priority must be given to the delivery of higher amounts of affordable housing. We emphasise strongly our agreement with the SESplan at 6.7. As mentioned previously, assessing land supply at shorter time scales (e.g.5 years) and relating this to the particular demographics of an area should give more effective results. Moreover, a '5 year effective land supply' should be determined by planners and not developers.

#### **Question 23: Climate Change Adaptation**

Do you think SDP2 could do more to help the area adapt to climate change? Please explain your answer.

The climate for Scotland is predicted to become significantly wetter and stormier. Hence, we consider that SDP2 should do more to help the SESplan area adapt to climate change along the following lines:

- Identify areas at risk to both fresh water and marine flooding and plan to improve flood defences in these areas
- Prevent building on medium to high risk flood plains
- Identify areas likely to be unsuited for housing due to exposure from increased wind speeds
- Devise building standards to deal with increased precipitation and wind speeds
- Devise building standards that will minimise flood damage for all susceptible new build, including measures to prevent incursion of sewage. Provide guidance and grants to facilitate the improvement of existing buildings against flood damage
- Promote the planting of significant amounts of trees and shrubs to sequester carbon
- Stronger protection for agricultural land that would be required for home grown food production due to anticipated shortfalls in certain imported foodstuffs because of adverse climate change effects elsewhere in the world. This should be influenced by the soils needed to grow particular types of crops to make up imported shortfalls and which are also able to withstand Scotland's changed climate.(The UK currently imports c.40% of its food requirements)
- Measures to contribute to a low carbon Scotland are also relevant to the amelioration of climate change effects. But care must be taken to ensure renewable energy projects do not endanger the natural and cultural heritage.

## Question 24: Development Planning and Community Planning

Do you consider that development planning and community planning in Edinburgh and South East Scotland could be better aligned? If so, please suggest ways in which this could be achieved.

There is a need to explore how community-led approaches can contribute to the delivery of both Development Planning and Community Planning. Spatial planning is important in engaging communities to establish a vision for their area and this could be a valuable part of Community Planning, aligning the future development of an area through the Development Plan and the provision of services in an area through the Community Plan.

## Question 25: Strategic Environmental Assessment

The Interim Environmental Report (IER) is produced alongside the MIR. It assesses the impacts of the options on environmental objectives and recommends ways in which the impacts can be avoided and mitigated. Do you have any comments on it?

### General

1. Like the HNDA material, the IER is a lengthy and complex document, which is not easy for lay people/community organisations to understand. How can this be resolved?
2. It appears the 'consultation authorities' do not include community organisations? It is important that such organisations should be consulted from the outset and given the opportunity to input into the generation of growth options.
3. It is not clear how final decisions are made at SESplan to determine the options for growth (Appendix D). For example, the CEC assessment for growth seems to favour Option 2 (Distributed Growth), whilst ELC, MLC and WLC appear to favour Option 3 (Growth Corridors) (Fife - no clear overall preference). This assessment (if correct) is to the detriment of many important aspects of Edinburgh's natural and cultural heritage and quality of life? So in this example, what weights are given (and by whom) to the various Local Authority preferences for growth?

### Specific

1. Executive Summary Para. 5: What does '*sustainably deliver*' mean?
2. Table 2.1 SEA Findings of SDP1 and Supplementary Guidance: Why is Green Belt Policy not mentioned?
3. Table 2.2 Comparison of SDP and LDP Assessments: Why is Green Belt Policy not mentioned?
4. Contextual Summary of Environmental Issues Table 3.1:
  - A number of the implications of environmental issues do not appear to be reflected in the MIR texts
  - Again Green Belt policy/issues are not mentioned.
5. Assessment Framework Table 4.1 SEA Objectives:
  - Again Green Belt policy/issues are not mentioned. It is difficult not to reach the conclusion that Green Belt policy has been discarded because it is seen as a significant barrier to growth?
  - More could be done in MIR texts to '*minimise loss of agriculture land*'
  - More could be done in MIR texts to '*minimise flood risk*'
6. Table 5.1 Assessment of Spatial Strategy Options;
  - The importance of minimising CO2/NO2 emissions from private car use/commuting/etc appears to be over emphasised/over weighted. Within the time scale of SDP2, vehicle engine technology should have improved to make a significant contribution to reducing emissions and lessening the importance of concentrating growth along transport corridors. Also rapid increase in digital technology is likely to increase working from home and a consequent reduction in the need to commute.
  - The impacts of growth upon landscape, green belt and quality of life issues have been significantly undervalued/under-weighted in the assessments of Option 3 (Growth Corridors)
7. Table 6.1 SEA Theme Potential Mitigation Measures:
  - Why is there no reference to mitigations for significant losses to the Green Belt? Green networks are not a substitute for the Green Belt
8. Table 9.1 Scoping Report Comments and Responses
  - Why has the SNH comment to '*include Green Belt sub objective under landscape and townscape*' been rejected by SESplan? The reasons given appear spurious e.g. the purpose, establishment and protection of green belts is national policy and the Edinburgh Green Belt was comprehensively underpinned by the 2008 review in terms of character assessment, qualities and capacity of certain areas for development. References to the important 2008 Review are conspicuous by their absence in the MIR document.
9. Appendix B - Environmental Baseline Data Table 9.3 Renewable Energy Generation Capacity
  - Given the large generation capacity in the Borders, it is not clear why there are so few installations, relative to the concentrations in East/West Lothian and Fife (Fig 9.7)?
  - Tables 9.7 and 9.8. Vacant + Derelict Land in the SESplan area amounts to 1905 ha and CEC 207 ha (@ 2014). It is crucial that this is all made available for housing at high densities and to specify the estimated contribution made to the housing requirement. It is not clear whether VDL = Brownfield? Or if there is a separate data set solely for brownfield – if so, it is important to reveal this data.

## Question 26: Other Issues

Are there any other issues which SDP2 should address?

1. Leith Docks was allocated for extensive housing before this was changed to Renewable Energy Industry. This has a significant consequence for the allocation of housing land elsewhere, especially in the Edinburgh Green Belt. Hence, it is important to monitor the development of Renewable Energy at Leith and the extent of its land take, to assess whether or not any opportunities for brownfield housing may still exist. This is allowed by Issue C. Moreover, the removal of green subsidies by the UK government and the fall in the oil price may already make a difference to the size of the renewable Industry. These unforeseen events indicate the precarious nature of estimations for 20 years ahead
2. Green Belts, especially the Edinburgh Green Belt, are under severe threats of irrevocable damage and losses from SG policies to increase growth substantially, apparently at the expense of agreed and longstanding environmental policies. The Cockburn Association considers this to be unacceptable – a view it believes is shared by many communities and individuals. Legitimate constraints to the availability of land for development must not be overruled.
3. Although this may be a matter for the SG, we are concerned about the increase in the amount of planning appeals against already agreed plan policies and particularly in cases of development on Green Belt/green space. This process is undemocratic and unfair, especially as there is no balancing Equal Right of Appeal. Hence, we believe that appeals by developers on sites that contain important natural and cultural heritage assets should only be permitted in the most exceptional circumstances.
4. A pilot survey of the membership of the Cockburn Association and representatives of the Edinburgh Civic Forum was carried out during August 2015. 100 responses were received. The purpose of the survey was to seek the views of a sample of Edinburgh citizens about the future growth of Edinburgh and their perceived value of the Edinburgh Green Belt.

The overall majority responses to the questions are quite clear:

- Q1: Edinburgh growth - No/small expansion 86%
- Q2: Edinburgh growth - Wider distribution around Scotland 76%
- Q3: Green Belt - Moderately valuable/very valuable 100%
- Q4: Green Belt – Stronger/much stronger protection 95%

(Five responses were received on behalf of community councils/amenity associations but were counted as single responses.)

The community council/amenity majority responses to the questions are similar to the overall figures:

- Q1: Edinburgh growth - No/small expansion 80%
- Q2: Edinburgh growth - Wider distribution around Scotland 80%
- Q3: Green Belt - Moderately valuable/very valuable 100%
- Q4: Green Belt – Stronger/much stronger protection 80%

Responses were spread across nearly all Edinburgh post codes.

The results of this survey reflect the high value of Green Belt and concerns about losses to development being expressed by a number of the eleven Green Belt organisations in Scotland.

The results are not dissimilar to recent polls about Green Belts in England. Ipsos MORI indicated that two thirds of people did not want the Green Belt built on and a poll commissioned by the Campaign to Protect Rural England showed that, on average, 64% of people agree the Green Belt should be protected, while just 17% disagree. In the south of England, an area under particular pressure from developers, 72% of respondents supported the Green Belt. There is strong support for Green Belts regardless of whether people own or rent their own home.

These views in England are underpinned by a recent article (attached) by Dieter Helm - he is a Professorial Fellow of New College, Oxford, and one of the most respected energy and environmental economists in the UK. He sets out cogently, why we should not allow the Green Belt to erode or decay further for short-term development gains. We believe his conclusions also apply to Scotland.

The format of the Cockburn's survey are appended for information. It is sincerely hoped that attention will be paid to the views expressed by a sample of Edinburgh citizens in the formulation of true sustainable development policies for the city.

### **Question 27 How to Get Involved**

Are there any other forms of communication you would like SESplan to use during consultations?

This is a difficult and technical document to respond to by lay people/community organisations. Many of the questions are vague, and could not be answered sensibly without considerable technical knowledge and expertise. It does not really look like a genuine consultation, as the time allowed is far too short. In view of this, we believe it is unreasonable to be asked to respond to this within a short timescale over the main summer holiday period.

Duncan Campbell  
Convener, Strategic Planning & Environment Committee  
The Cockburn Association