

# The Cockburn Association AGM 2014

## Strategic Planning and Environment Report

### Duncan Campbell

#### Introduction

I am privileged to follow Bill Cantley's long and distinguished Convenership of the former Transport and Planning Committee; or that part of it, now dealing with strategic planning and environment matters, acronymed as SPEC. I am now retired, but my professional background was in forestry and landscape architecture.

#### How SPEC works

1. There are currently 4 members of SPEC (including the Convenor), whose skills/expertise cover architecture, landscape architecture, economics, environment, planning, public policy formulation and governance of public bodies. It would be most helpful to have more members to deal with the consultation workload.
2. The Director monitors all Scottish Government (SG), SG agencies and City of Edinburgh (CEC) consultation lists and identifies those that might affect Cockburn interests for timely discussion with SPEC members.
3. The drafting of the response to selected consultations is divided amongst SPEC members and these are collated by the Director or Convenor (depending upon their respective workloads) for submission by the required deadlines.
4. Researched by the Director, the final response will include any relevant Cockburn archival material, as well as any comments from other Cockburn committees.
5. Outcomes of SPEC representations are monitored as resources permit
6. SPEC also identifies any policy areas (new or revisions) within its remit that Cockburn may wish to address e.g. Greenbelt protection and formulates drafts for such work for Council to consider
7. SPEC members advise the Director about SPEC issues as required
8. SPEC members also attend the Edinburgh Civic Forum meetings that the Cockburn organises with the City Council

#### Overview

There have been significant consultations during this year on almost all aspects of the national planning system to which the Cockburn has responded. A main focus in much of this activity has been the economic strategy of the Scottish Government (SG). This aims to increase sustainable growth in Scotland, especially in the Edinburgh city region, which is regarded as a 'key driver' of the Scottish economy. Notwithstanding this, we have in a number of our responses questioned the government interpretation of what is 'sustainable'.

Changing patterns of economic growth and development; social and demographic change, and population growth; and the Scottish Government's economic strategy are creating significant development and housing pressures in south east Scotland and the Edinburgh city region. The Committee believes these have profound implications for the nature of Edinburgh as a city and place to live in the future, and for the remaining Green Belt around the city which has already been significantly eroded and devalued. We believe it is essential that the voice of the Cockburn is heard clearly and loudly on these issues, and the Committee plans to continue to focus on developing for Council's consideration, a vision and evidence on the future of Edinburgh and its Green Belt.

## **Consultations responded to during the year**

Representations to 9 consultations were made as outlined below. Some of this work can be onerous in terms of the volume and complexity of the material required to be read and understood within a limited timeframe e.g. the SESplan Supplementary Guidance on Housing Land Requirements contained over 500 pages of associated documents on line

### **Scottish Government (SG)**

#### National Planning Framework 3 07 /2013

This provides the overarching policy guidance for a wide range of Scottish issues from which Scottish Planning Policies are derived and to which local government development plans must adhere, for example it covers – development (all types), sustainability, renewable energy, transport, health and wellbeing, tourism and the natural and cultural environment.....

Amongst many comments (our response ran to over 6000 words), as in previous years, we expressed concerns that the continued emphasis upon growth risked causing difficulties in achieving a reasonable balance with the requirements of the environment policies.

#### Scottish Planning Policies 07/2013

This proposed revisions to most of the current suite of planning policies including our interests in the effects of development (economic and housing), natural and cultural heritage. We commented on nearly all the issues raised in over 200 paragraphs of the document.

Our main concern was that, in general, undue weight was being afforded to development and growth to the potential detriment of the natural and cultural heritage. Particular worries were expressed about potential adverse effects upon the green belt and the lack of effective long term protection for sensitive areas.

#### Scottish Planning Policy - Sustainability and Planning 11/2013

This proposed 'a general presumption in favour of development that contributes to sustainable development'.

Whilst supporting properly defined 'sustainable development', the document also carried considerable emphases upon 'sustainable economic growth'. Hence, we considered the wording proposed could be open to abuse, unless carefully qualified and suggested the following alternative:

'This SPP presumes in favour of development that contributes to recognised principles of sustainable development that respect and implement all the requirements of the UK's shared framework for sustainable development'.

In order to comply with the full Bruntland definition of sustainable development, we also suggested that the list of policy principles should make clear that the economic, environmental and social principles are of equal weight and priority.

#### Community Empowerment Bill 01/2014

This was a complex document in which the SG proposes to extend the right to buy to communities in all parts of Scotland, where it is satisfied that it is in the public interest. It included some 75 questions about this proposal and various ways in which it might be implemented.

We supported the extension of community right to buy, but pointed out the practical difficulties of implementing this in the urban context (significantly higher costs than rural, difficulties of raising finance etc)

## **SESPlan**

### Supplementary Guidance on Housing Land Requirements 12/2013

The South East Scotland Plan (SESPlan) sets out the development, planning and housing strategy for the region. The Supplementary Guidance is a key document that will determine the housing land allocations for housing up to 2032. Critically, Edinburgh is required to find an additional 7700 houses during the period up to 2024

The numerous calculations that comprise housing land allocations are complicated and difficult to challenge, especially for those not versed in the processes or without access to all the relevant data. However, we expressed our strong concerns about the reliability of the results produced, as so much appeared to be based on projected trends, assumptions and guesstimates.

Amongst many comments, we expressed particular concerns about:

- The small amount of brownfield land being brought forward for development (apparently due to additional costs involved, unfavourable economic circumstances and consumer preference for greenfield sites and lower density)
- Further losses of green belt and good quality agricultural land to development.

Because of the environmental constraints and other restrictions within the boundaries of the City of Edinburgh, we agreed with the Guidance's view that a significant proportion of Edinburgh's proposed housing allocation may need to be met in the other five LDP areas (Lothians, Fife, part Borders)

We understand that there have been revisions of housing land calculations for the new version of the Edinburgh Local Development Plan expected to be published on line on 9 May. This will be subject to further public consultation.

## **City of Edinburgh Council (CEC)**

### Edinburgh Local Development Plan 06/2013

This covered all material aspects of living in Edinburgh. Our responses were as comprehensive as possible and exceeded 13,000 words. They included many of the concerns already mentioned elsewhere in this report as well as issues for support and objection.

As mentioned, we understand this report will be superseded by a new version, which may mean that all our previous comments (with revision as necessary) might have to be repeated.

### Trees in the City 09/2013

A survey indicates that Edinburgh has 638,000 trees in Council and private ownership. We supported the general thrust of this policy, which is to extend the tree component of the City and to improve its management.

### Planning Guidance on Advertisements, Sponsorship, City Dressing 10/2013

In general we supported this guidance, which mainly seeks to improve the control of advertisement space throughout the city, including the use of digital formats e.g. on scaffolding coverings

### Service Level Performance in Planning 02/2014

This is a useful annual document that provides an opportunity to comment upon various aspects of the Council's performance in planning

Extracts from these representations are included in the Cockburn newsletters. Full versions can be supplied to members on request.

**Outcomes**

On key issues for the Cockburn like greenbelt/green space protection, protection and reuse of listed buildings, standards of design, the impression is that where there is a conflict between these issues and the requirements of growth, greater weight in decision making is given to growth. And the Cockburn's many representations about the need for respect and balance for natural and cultural heritage policies appear to be set aside.

**Committee**

I would like to express my appreciation of the contributions made by Committee colleagues David Cameron, John Fleming, David Willcocks (minute secretary), recently joined Andrew McLeod (economist, policy maker and retired civil servant from the Scottish Executive) and the Director Marion Williams to SPEC's work, especially during the transition from the old to the new committee. Thanks also go to Jon Grounsell for his input and advice to some of the important consultations.