

The Cockburn Association Annual Report 2014

Strategic Planning and Environment

Duncan Campbell

Overview

The numbers of responses submitted to consultations from Scottish Government (SG) and the City of Edinburgh Council (CEC) have been similar to last year. They cover a range of subjects relevant to Cockburn's interests, including the future growth of Edinburgh.

The SG's economic strategy is to promote sustainable growth, especially in the Edinburgh city region, which is regarded as a 'key driver' of the Scottish economy. The consequences of this policy continue to be manifest in calculations of population forecasts for the city and in the encouragement of jobs and growth by the CEC in certain major development projects.

Public disquiet about the use of the planning system to facilitate growth, in both urban and rural situations, to the detriment of the natural and cultural heritage has increased during the year. Much of SPEC's work has sought to identify the relevant issues and possible partners to raise these concerns by appropriate means with the SG and the CEC

The South West (Edinburgh) Community Forum (SWCF) is a consortium of community councils and amenity bodies in the south and west of Edinburgh, where the development pressures upon the green belt are very high. Many of their members are affiliates of the Cockburn and SPEC has been working closely with them to explore and understand the methods for calculating population forecasts for Edinburgh, which form a key ingredient of the SESplan Housing Need and Demand Assessment (HNDA). To this end, a number of meetings have been held with the Population & Migration Statistics Branch of National Records of Scotland. In this work, the Chair (Professor Cliff Beevers) and Secretary (Archie Clark) of SWCF have been most helpful and could now be regarded as 'de facto' co-options to SPEC.

The methodologies used for forecasting population trends appear credible, although net migration calculations carry a high degree of uncertainty. But 'variables' (subjective judgments, policies, student housing, etc) are included within the section dealing with household projections that are at centre of the HNDA process.

Nevertheless, it is still difficult to grasp that the forecasts 'indicate' a 30% population increase for Edinburgh over the next 35 years (125,000 people), which is 6 times larger going forward than the known history of the city's recent population growth?

Much of the land to house this increase will have to be found from the Edinburgh Green Belt, which already has/is being seriously eroded by development. To ascertain the situation at other Scottish green belts, we asked the Scottish Greenbelts Alliance (SGBA) to issue a questionnaire about green belt issues (their value or otherwise, losses, causes of losses etc) to the 11 green belt organisations in Scotland. To date responses from 4 green belt organisations have been received and replies from others are being sought, especially from Aberdeen, St Andrews and Dunfermline, where problems are thought to exist.

Proposals for housing also include the use of prime agricultural land and an enquiry has been submitted to the Hutton Institute on whether or not the current SPP on protection of agricultural land in Scotland is adequate to deal with possible adverse effects of climate change on food imports to UK.

In seeking partners, presentations on development pressures on the green belt have been given to the Association for the Protection of Rural Scotland (APRS), the Landscape Task Force and the Planning Task Force of Scottish Environment Link (SEL) and the Edinburgh Civic Forum. Jon Grounsell also spoke on greenbelt issues at a Midlothian group meeting concerned about this matter.

Both APRS and SEL understood the concerns raised about the continued loss of green belt lands and APRS and Landscape SEL were prepared to offer letters of support, but were unable to do more (e.g. develop a national campaign) unless it could be shown that these concerns were being experienced in other green belts in Scotland. As mentioned above, this matter is being explored with the help of the SGBA.

There are, however, indications of wider concerns with the way the planning system in Scotland is currently operating, for example, in relation to infrastructure developments and rural housing. The National Trust for Scotland (NTS) and other rural and conservation organisations, recently sent an open letter to Scottish Ministers flagging some of these concerns. Like the Cockburn, they feel that short-term growth priorities are being given preference over genuine sustainable development and equity. Further presentations/discussions on green belt issues are being sought with NTS and FOE Scotland to assess any opportunities for collaboration on green belt and wider planning issues.

Articles on green belt and related planning issues have been shown in the APRS newsletter (D Campbell, autumn 2014), the Currie & Balerno News (A Clark, February 2015) and the Sunday Times (NTS et al, 1 March 2015).

More work is planned to promulgate these matters during 2015/16, as we believe it is essential that the voice of the Cockburn is heard clearly and loudly on these issues. In particular, the committee has proposed to Council:

- SWCF + SPEC to arrange a further meeting with interested MSPs to discuss concerns and how best these may be presented to SG.
- SPEC + SWCF to discuss concerns with SG Head of Planning and Cabinet Secretary for Social Justice & Pensioners Rights
- SPEC+ SWCF to continue discussing concerns with CEC Acting Head of Planning and Convenor of Planning Committee
- Consider devising a Petition, supported by surveys, of citizens views on the future size of Edinburgh and the values ascribed to the green belt and associated green spaces. Such a petition may have the potential for a national dimension
- Seek to include outcomes in manifestos of political parties for the Scottish elections in 2016.

Consultations responded to during the year

Representations to 9 consultations have or are in process of being made as outlined below.

Scottish Government (SG)

The Future of Land Reform in Scotland (01 2015)

The SG's '*...aspiration is for a fairer and more equitable distribution of land in Scotland where communities and individuals can own and use land to realise their potential. Scotland's land must be an asset that benefits the many, not the few....*'

This consultation covered a very wide range of issues, many not relevant to Cockburn, but SPEC responded, because it included questions about 'Common Good', which Cockburn had made comments recently in another context. There are hints that the underlying agenda is to enable more development in the countryside. Some of the proposals for dealing with private rights to facilitate this, appear quite draconian.

The Historic Environment Scotland Act 2014, etc, Secondary Legislation. (03 2015)

Much of the Cockburn's work is involved with safeguarding the cultural heritage. So it is important to assess whether or not the SG proposals, via their policies *Our Place in Time* and the recently formed Historic Environment Scotland (by merging HS and RCAHMS), are fit for purpose.

The SG's intention is to simplify wherever possible, to align ancient monuments and listed buildings processes more closely and also to align with general planning practice where appropriate. In addition, they have added additional transparency through publication, and have provided for new appeals which will ensure HES decision-making can be tested. We found many of the proposals acceptable, but suggested a number of improvements and additional safeguards.

Consultation on Burial and Cremation (in process)

The committee is considering a response, because the consultation includes the management of cemeteries, which frequently can be poor. Also Edinburgh is running out of space for burials.

Low Emission Strategy (in process)

The committee is considering a response to this consultation, in which SG is proposing the adoption of Low Emission Zones (LEZs), which is a potentially effective measure that could help to improve local air quality throughout Scotland, including Edinburgh.

A review of Scotland's Land Use Strategy (in process)

The committee will review whether or not this consultation has any relevance for Edinburgh

SESPlan

Supplementary Guidance on Housing Land Requirements 06/2014

Last year, we reported on our response to the South East Scotland Plan (SESPlan) that 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

Consultation on this document continued into this year 2014/15. To recap, 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.

Strategic Development Plan 2 (05 2014)

We responded to a questionnaire about issues related to the updating of this plan. We suggested that a new plan was required, based around a new vision for Edinburgh along the following lines;

'By 2032, the Edinburgh City Region continues to be internationally recognised as an outstanding area in which to live, work and do business. It is a place where growth is based on recognised principles for high quality sustainable development, its natural and cultural heritage assets are valued, includes measures to mitigate climate change and its people are healthier and have a proper say in their futures.'

City of Edinburgh Council (CEC)

Edinburgh Local Development Plan (ELDP) 2 (09/2014)

The first ELDP 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.

Due to revisions of housing land calculations, a second, new ELDP 2 was produced that covered most of the same ground. Because of its 'new' classification, all of our previous comments with updates had to be repeated.

Views on Student Housing in Edinburgh (in process)

This is a controversial subject. Student numbers are expected to increase significantly in Edinburgh and this data does not appear to be included in the population forecasts for the city. The council is seeking views on how and where this increase might be accommodated

Our responses can be found on our website or printed on request.

Outcomes

Last year we reported that the Cockburn's many representations about the need for respect and balance for natural and cultural heritage policies in the various consultation proposals appear to be set aside. Unfortunately this doesn't seem to have improved and is being experienced by other individuals and community groups, causing considerable frustration and disillusionment that carefully prepared responses are not being listened to.

Committee

I would like to express my appreciation of the contributions made by Committee colleagues David Cameron, David Willcocks, Andrew McLeod and the Director Marion Williams to SPEC's work during the year. Thanks also go to Jon Grounell for his input and advice to some of the important consultations.

The committee is involved in interesting and challenging work involving many important aspects for the future wellbeing of the city. But to do this more effectively, we need more members and we would encourage people to join us, please.