

The Cockburn Association AGM 2016

Strategic Planning and Environment Report – by Duncan Campbell

Overview 2016

The numbers of responses submitted to consultations from Scottish Government (SG) and the City of Edinburgh Council (CEC) have been similar to previous years. They cover a range of subjects relevant to Cockburn's interests, including the future growth of Edinburgh and the consequential impacts upon its Green Belt.

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 cause concern to many community and other organisations, including the Cockburn. Many feel that short-term growth priorities are being given preference over genuine sustainable development and equity. Some of the main concerns are;

1. The over emphasis upon growth in Scottish Planning Policies (NPF/SPP) tends to weaken environmental policies and lead to an unbalanced approach to decision making. The SG requires these policies to be implemented by local authorities and the DPEA (Scottish Reporter's Unit)
2. Outcomes of 1) can often cause adverse impacts upon the natural and cultural heritage of Edinburgh and its environs.
3. Whilst the methodologies used for forecasting population trends appear credible, net migration calculations carry a high degree of uncertainty. For example, it is not clear why the amount of net migration for Scotland that is allocated to Edinburgh is so high?
4. Incorrect application of the principles of sustainable development (SD) and unbalanced implementation of the UK Framework for Sustainable Development in Scotland. The original Brundlandt definition of SD (Our Common Future 1983) is that SD should not damage the environment.
5. Greater direction/incentives are required to use brownfield land for development before 'green land'
6. Stronger protection in the planning system is required for green belts/green spaces.
7. Stronger protection is required in the planning system for prime agricultural land that could be needed for home food production in the event of climate change adversely affecting essential food imports. (NB: at present the UK imports c.40% of its food requirements)
8. Inequity in the Scottish planning system that includes an appeal system for developers, but not for others. A limited/tailored Equal Right of Appeal for others is urgently required.

Last year's report included collaboration with the Scottish Green Belt Alliance (SGBA) to ascertain the situation at other Scottish Green Belts; a questionnaire was distributed about green belt issues (their value or otherwise, losses, causes of losses etc) to the 11 green belt organisations in Scotland. Unfortunately the SGBA was wound up during 2015. But, helpfully, its role has been taken on by the Association for the Protection of Rural Scotland (APRS) by the formation of APRS Green Belts Alliance. The Cockburn is an affiliate member of APRS (and vice versa) and 2 members of SPEC have agreed to serve on the APRS 'Alliance' committee. The draft purposes of this committee are:

- Co-ordinate the work of the various existing Green Belt groups across Scotland
- Encourage the establishment of new local groups and offer advice on effective campaigning
- Act as the national champion for Green Belt groups in Scotland
- Campaign for stronger protection for Green Belts and closer adherence to these policies at both Scottish Government and local Council levels
- Carry out research and issue publications to promote best practice

Of the 11 Scottish Green Belts, 6 with support groups have been contacted so far. All report concerns about moderate/large losses to development and support for a national campaign for their more effective protection (Edinburgh, Ayr/Prestwick, St Andrews, part Glasgow, part Perth, part Dunfermline). Responses are being sought from the remaining green belts. A poll about green belt issues in Scotland, using a professional pollster, is being explored (c.f. recent polls in England).

During 2015, representatives from SPEC and the South West (Edinburgh) Community Forum met and discussed issues of concern in the planning system with the drafters of manifestos in the main Scottish political parties for the 2016 Scottish Parliamentary Election. Receptive hearings were provided by Scottish Labour and Scottish Conservatives, with SNP 'neutral'. No meetings could be arranged with the Lib Dems or the Greens, but notes of the issues to be raised were sent to them and the other parties. Head points of the main issues were;

- Restore public confidence in the planning system
- Provide fairness in the planning system
- Improve assessments of housing land requirements
- Stronger protection for environment/heritage/agriculture in the urban/peri urban context

(NB: SWCF is a consortium of community councils and amenity bodies in the south and west of Edinburgh, where development pressures are severe).

To supplement SPEC's response to the SESplan 2 Main Issues Report (MIR) a small 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 the perceived value of the Edinburgh Green Belt. The overall majority responses to the questions were quite clear e.g.

- 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%

The views of males and females did not differ greatly. Responses were spread across nearly all of the Edinburgh post codes. Cockburn is now conducting a similar survey over a wider sample of Edinburgh citizens.

SPEC representatives have also attended meetings relevant to its remit e.g. Edinburgh Civic Forum; Planning Democracy Conference; SWCF – Councillor Ian Perry, Convenor, CEC Planning Committee; SWCF – Lyndsey Nicoll, Head of DPEA; SWCF - Green Belt presentation to students participating in a Global Leadership Challenge about mitigating urban sprawl; Hutton Institute – Land Capability for Agriculture; Green Belt protection groups in Midlothian; Head of Policy NTS - Green Belt issues

Consultations responded to during the year

Representations to 10 consultations (9 in 2014) were made as outlined below.

Scottish Government (SG)

Consultation on Burial and Cremation

This was a comprehensive review running to nearly 60 pages and 90 questions. It was considered important to respond because Edinburgh is running out of space for burials and the management of cemeteries (especially the treatment of headstones), often can be poor.

Low Emission Strategy

The 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

Responses were submitted to the Community, Environment, Forestry and Biodiversity sections of this consultation, which appeared to have relevance for Edinburgh. We particularly supported the need to properly assess the values/benefits that environment provides to society and the need to take an holistic approach to decision making about land issues.

SG Review of the Scottish Planning System

This important review was welcomed. The concerns outlined in the Overview of this report (and others) were included in the response. As most of these challenged the present primacy given to economic growth by the SG, it will be interesting to see whether or not the need for greater balance in the planning system (e.g. between the requirements of growth and those of the environment) will be accepted?

SG Permitted Development Rights: Non-Domestic Solar Panels and Domestic Air Source Heat Pumps

The design of individual solar panels and the pattern of their arrangements on roofs can have significant impacts upon the aesthetic quality of roofscapes, which are often prominent features.

Historic Environment Scotland Corporate Plan 2016 – 2021

A strong defence of the heritage against inappropriate development is important. However, accurate assessment of proposals and flexibility of decision making will be required if the aim *"Innovation/embracing change and enabling"* is to be successfully implemented.

City of Edinburgh Council (CEC)

SESplan 2 Main Issues Report (MIR)

This was a major response running to 16 pages/8800words. The MIR ran to several hundred pages, including technical support docs e.g. Strategic Environment Assessment (SEA) 90 pages. The concerns outlined in the Overview of this report (and others) were included in the response. The main growth option of 'Growth Corridors' was not supported, as this would destroy large sections of the green belt/prime agricultural land and has the potential to return to long discredited "ribbon development" that could also compromise the character and identity of settlements. Distribution of growth around appropriate locations in Scotland was preferred. The response included results of the CA pilot survey of a small sample of Edinburgh citizens on the growth of Edinburgh and Green Belt issues (mentioned in the "overview" of this report).

CEC ELDP response to Reporter's queries about Green Belt issues raised by Cockburn

Responded to the CEC response to the Reporter's enquiry. It was still not apparent that CEC was properly addressing CA concerns

Student Housing in Edinburgh

SPEC contributed to the response on this controversial subject. Student numbers are expected to increase significantly in Edinburgh and it is not clear how this data is handled in the population forecasts for the city.

Extracts from these representations are included in the Cockburn newsletters. Full versions can be supplied to members 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 still 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. This suggests that even greater efforts are required to persuade policy makers and politicians to produce better balanced policies?

Committee

I am pleased to report that this year SPEC has benefited from the involvement of several new members and now comprises: Pam Barnes, Simon Byrom, David Cameron, Duncan Campbell, Sheila Gilmore, Jon Grounsell, Andrew Macleod.

I would like to express my appreciation of the contributions made by Committee colleagues and the Director Marion Williams to SPEC's work during the year.

Duncan Campbell
Convenor SPEC

2016