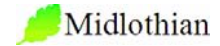


Edinburgh and Lothians
STRUCTURE PLAN
Joint Liaison Committee



**THE CASE FOR THE ABANDONMENT OF THE REVIEW OF THE
EDINBURGH & THE LOTHIAN STRUCTURE PLAN 2015**

**A SUBMISSION TO SCOTTISH MINISTERS BY THE EDINBURGH & THE
LOTHIAN STRUCTURE PLAN JOINT LIAISON COMMITTEE, ON
BEHALF OF THE CITY OF EDINBURGH, EAST LOTHIAN, MIDLOTHIAN
AND WEST LOTHIAN COUNCILS**

1 Purpose

- 1.1 This submission seeks the approval of Scottish Ministers for the abandonment of the current review of the Edinburgh & The Lothians Structure Plan 2015. The submission argues for a refocusing of strategic planning to secure the early preparation of a Strategic Development Plan involving likely joint working between the four Lothian authorities, Fife and Scottish Borders.

2 Background

- 2.1 Scottish Ministers approved the Edinburgh and The Lothians Structure Plan 2015 (ELSP2015), with modifications, in June 2004. One modification required that the plan be replaced by 2008, two years earlier than envisaged by the joint councils in the finalised structure plan. Following the recent Royal Assent for the Planning Bill, it is understood that the new strategic planning system would start in mid 2008.

Local Plan Preparation Progress

- 2.2 The structure plan requires that local plans be finalised no later than 18 months following structure plan approval, that is, by December 2005. Currently, the Finalised West Lothian Local Plan is at public local inquiry, and programmed to end in early February 2007. The public local inquiry into the Finalised East Lothian Local Plan 2005 finished at the end of November 2006. Both local plans have been prepared to

conform to the ELSP2015. The Finalised Midlothian Local Plan, also ELSP 2015 compliant, was placed on deposit earlier this year and its public local inquiry will begin in May 2007. The City of Edinburgh Council's Rural West Edinburgh Local Plan was adopted in June 2006 and conforms to the ELSP2015. The Edinburgh City Local Plan's consultation draft was approved in March 2006, and should be finalised by March 2007.

- 2.3 All four planning authorities are bringing forward the local plans that will implement the ELSP2015 and preparing the development frameworks/briefs and related guidance that will guide their strategic land releases. All this is at a time when the authorities must also bring forward an earlier than anticipated review of the ELSP2015.
- 2.4 Despite these challenges, the review process has made progress. A Structure Plan Review 2020 Consultation Paper was published for consultation during May and June 2006. Consultation responses have been summarised and reported to the Joint Liaison Committee. The paper set out the options for reviewing the ELSP2015, suggesting that a limited alteration is appropriate since there may not be a requirement for significant additional new housing land allocations before 2020. The focus of effort should therefore be on the delivery of current housing and employment land allocations and securing the provision of affordable housing.
- 2.5 However, the timescale for this structure plan review needs to be looked at in relation to ongoing local plan preparation timescales. A significant procedural dislocation is emerging between these two tiers of the current development plan system. It is unlikely that the West Lothian and East Lothian Local Plans, the two most advanced local plans currently in preparation, will be adopted before the end of 2007/beginning of 2008. The others will follow on from this. Since the review of the ELSP2015 is currently programmed to allow approval by 2008, this could happen before all of these local plans have been adopted in conformity with the current ELSP2015. At this stage it still remains a possibility that an ELSP2015 Review could adopt a development strategy that departed materially from that of the approved ELSP2015. In such circumstances, these emerging local plans could not be adopted in conformity with that approved ELSP 2015 Review.

City Region Planning

- 2.6 The procedural position is further complicated following the enactment of the Planning Bill and its requirement to replace local and structure plans with a single local development plan, other than in the city regions of Aberdeen, Dundee, Edinburgh and Glasgow. Here there will be a requirement to prepare strategic development plans for these city regions that will take forward long term settlement strategies, in addition to individual authorities preparing their own local development

plans. The 2005 Planning White Paper proposed that the Edinburgh City Region plan would involve the four Lothian authorities, Scottish Borders and Fife. Consequently, at a time when the Lothian authorities are working to implement the ELSP2015 through local plan reviews, and at the same time reviewing the ELSP2015 itself, the whole strategic development plan context will change.

- 2.7 The Lothian authorities believe that this brings into question the validity of continuing with the current structure plan review and whether the resources involved and procedural risks are justified. The housing land position to 2020, a fundamental reason for undertaking a limited alteration, further questions the need for the early review and suggests looking at the land supply on a longer term basis.

SPP21

- 2.8 SPP21 has further changed the context within which the review of the ELSP2015 is being brought forward. This review has been seen as a 'roll-forward' of key elements of the plan to 2020 and as such the Lothian authorities consider it could be done as an alteration rather than a full review and replacement. However, SPP21's requirement that Green Belts must be defined in the context of a long-term settlement strategy of at least 20 years requires that any comprehensive review of the Edinburgh Green Belt should be carried out through the new strategic development plan. That plan's settlement strategy is currently unknown and the role of other Green Belts in the region, eg Dunfermline's, will need to be considered as part of that wider planning context.
- 2.9 The land allocations required by the current structure plan alteration could now only be brought forward in the required timescale of this review if allocations were to avoid Green Belt land. This may not be a practical option for some of the Lothian authorities. If the loss of Green Belt land to development were to be considered then this would have to be done in the context of a long-term settlement strategy, requiring both a structure plan timescale and a preparation programme extending beyond that being considered for the current structure plan review. A comprehensive review of the Green Belt is now required to help inform consideration of the long-term settlement strategy to be agreed through the new strategic development plan. On the basis of the last Green Belt review, undertaken in 1999, this would take at least a year. It is a major work package that has not been programmed into the ELSP2015 review. Even if the Ministers wish that the current structure plan alteration be pursued, the Lothian authorities will still need to address the issues raised by SPP21 in a city region context.
- 2.10 Consequently, the implications of SPP21 are that (a) the proposed timeframe of the ELSP2015 review, as currently envisaged, to 2020 is not consistent with defining a Green Belt in the context of a 20 year settlement strategy and (b) a comprehensive review of the Green Belt

is realistic only if part of the new strategic development plan. This casts serious doubt over the scale and timeframe of the current ELSP2015 review. It is unlikely that the Lothian authorities could deliver a more comprehensive review of the Green Belt and its boundaries as part of the current ELSP2015 review such that it could be submitted in time to secure approval in 2008.

3.0 The Future of the ELSP2015 Review

- 3.1 The Lothian authorities agree that there are now clear advantages to be gained in timescale, resources and the quality of the end product by refocusing their strategic planning direction and resources and committing to work on a Strategic Development Plan now, rather than continuing to progress the ELSP2015 review. A Strategic Development Plan would be secured earlier than will be the case if the authorities continue to focus on an expanded ELSP2015 review and, only once it is submitted to Scottish Ministers, begin substantive work on a Strategic Development Plan. Given the commitment to City Region Planning in the Planning Act, there is likely to be some public and stakeholder confusion as to why the technical requirements of the 1997 Act in respect of strategic planning are still being followed.
- 3.2 Consequently, the Lothian authorities are of the view that the current ELSP2015 review should be abandoned, with a consequent repositioning of effort to deliver an early Strategic Development Plan in association with Fife and Scottish Borders. This position has been raised informally with planning officials of these Councils and no objection in principle has been raised.
- 3.3 The Edinburgh & The Lothians Joint Structure Plan Committee accepts that it must be confident that suitable mechanisms are put in place to deal with any consequences of a later replacement of the approved ELSP2015. The authorities will undertake to consult with appropriate stakeholder interests to ensure that any issues and implications arising from the abandonment of the current structure plan review are understood and addressed. Housing land supply will be a significant consideration. Monitoring the five year supply is an annual exercise and allows any such deficiencies to be identified. ELSP2015 Policy HOU10 provides a mechanism for the release of additional housing land within structure plan core development areas should the five year land supply fail defined parameters. The land supply will be monitored and action taken to redress any deficiency, prior to the new city/region plan being in place. Any such actions will have regard to available or committed infrastructure, including capacity within the strategic transport infrastructure (both public transport and roads), and the ability of existing housing sites to deliver promptly. An initial meeting has been held with Homes for Scotland on matters such as market demand, and the four authorities will continue with further stakeholder liaison.

- 3.4 Monitoring the supply of land for business and industry will indicate any issues relating to the strategic employment land supply. It is not anticipated that the extension of time before the ELSP2015 is replaced will have any significant implications for other elements of strategic planning policy. These policies are robust and generally consistent with national planning policy. Nonetheless, these will be monitored and action taken as appropriate. Work on transport modelling is ongoing and will be extended to include the areas of the eight SEStran authorities responsible for the Regional Transport Strategy (the Lothian authorities, Fife, Scottish Borders, Falkirk and Clackmannan).
- 3.5 Finally, Scottish Ministers are asked to note that, in the event of their approval of the abandonment of the current ELSP2015 review, the Lothian authorities, with the support and involvement of Fife and Scottish Borders Councils, will immediately undertake a programme of work required to achieve an early start on the Strategic Development Plan. The major strands of such a work programme are outlined in draft form in Appendix One. The six Strategic Development Plan authorities are also actively considering a new joint governance mechanism in association with finalising the project plan to allow the survey and analysis stages to be done in time for the new Strategic Development Plan Authorities to proceed straight to plan-making in mid-2008.

4.0 Request for Formal Abandonment

- 4.1 The four Lothian authorities formally seek the approval of Scottish Ministers to abandon the ongoing review of the Edinburgh & The Lothians Structure Plan 2015. This will allow the immediate commencement of joint work on aligning data and carrying out survey and analysis stages, so that the six councils will be at an advanced stage in joint plan-making when the new system is introduced.

City of Edinburgh Council
East Lothian Council
Midlothian Council
West Lothian Council

22 January 2007

DRAFT PROPOSED PROJECT BRIEF FOR TRANSITIONAL CITY REGION PLAN WORKING

PROJECT PURPOSE

To jointly carry out the SURVEY and ANALYSIS stages of the new city region plan during the transition period, to allow the new Strategic Development Plan Authority to proceed straight to PLAN stage when new system introduced.

To achieve this, a new governance framework, joint working systems and an up to date evidential base will need to be created. This will be crucial to withstand EiP scrutiny.

DEFINING THE PROJECT

By the introduction of the new SDP system to:

- put in place formal joint working governance structures (*in progress*)
- converge data and information systems (*some work on HLAs done*)
- identify, and where appropriate commission, key research & studies
- present options for a new city region plan boundary & SDP topics
- put in place effective liaison arrangements with strategic partners & stakeholders (eg SESTRAN)
- analyse and present the results of information gathering
- present a project plan to deliver the SDP

KEY OUTPUTS

- a “State of the Region” technical report / Regional Report / Report of Survey type baseline document
- a draft Main Issues Report for early, targeted consultation, including a strategic SWOT analysis
- a project plan and programme for preparing the plan

TIMESCALE

- Complete by mid 2008 – the earliest date the new SDP system likely to be introduced

RESOURCES AND PROJECT MANAGEMENT

- **Management:** to consider and agree the introduction of a project management system such as Prince 2 to ensure proper project control and delivery of the new SDP
- **People:** to consider and agree the staffing structure required to deliver the SDP, including the merits of appointing a full-time Project Manager with dedicated or named supporting staff from each SDP

authority. To consider the requirement for any specialist consultancy work.

- **Budget:** to consider and agree how the authorities will fund the delivery of the SDP. In this regard, the Scottish Executive's resourcing of the new Regional Transport Strategies is noted.

MAIN WORK PACKAGES

1 EARLY SCOPING/AUDITING WORK

- Eastern Interceptor Study
- economic development studies and initiatives
- transport modelling suites (eg TMfS, LUTI & Fife's paramics model)
- retail studies (eg EARNS, MLC's RDPC study)
- landscape studies

2 ALIGNING INFORMATION

- Census and other data/assumptions/projections incl info on size, composition & distribution of population
- GIS data
- Housing Land Audits
- Joint working extranet (Lothians extranet now operating)
- SEA data & baseline info & sustainability indicators
- Common consultation database/mailing list
- Retail & town centres – eg vitality & viability indicators

3 INFRASTRUCTURE SURVEYS & ANALYSIS

Catchments, thresholds, expansion potential, & capacity

- water supply
- drainage
- schools
- transport – rail, tram
- trunk roads & major junctions
- communications
- energy supply systems
- flood risk areas

4 POTENTIAL RESEARCH TOPICS & COMMISSIONED STUDIES

- Sustainable development in a strategic development planning context:
 - best practice survey of sustainable approaches to city region planning
 - sustainable settlement options
 - possible in-house workshop with CEC's Sustainable Development Partnership and other similar interests in the other authorities
- A review of the form and function of the Green Belt, including an assessment of its landscape quality, as an input into the development of a long-term settlement strategy.
- Urban Capacity Study
- Housing:
 - market analysis/signals
 - affordable housing market areas
 - effect of housing market on local economy
 - wider study of housing market areas/identifying sub-areas
- Retail Needs/Capacity Study
- Infrastructure & SEA baseline information gaps

5 STRATEGIC LIAISON

Create effective formal and informal links with other key strategic processes and stakeholders, including:

- SESTRAN
- Scottish Enterprise & SESEF (new South East Scotland Economic Forum)
- Homes for Scotland, Communities Scotland
- Governmental environmental agencies (SEPA, SNH, HS, ADS)
- The other 3 Scottish city regions
- Community planning groups
- Contiguous planning authorities
- Scottish Water & other infrastructure providers

NEXT STAGE

Develop a more detailed project plan for approval of project board. To include work breakdown and timeline, stage plans, milestones, project risks and contingencies, mechanisms for review and signing off stages, training needs (eg PRINCE2), more on roles and responsibilities.

POSSIBLE TRANSITIONAL GOVERNANCE FRAMEWORK

