



The Chief Executive
Shadow Local Authorities

Our Ref: PGB/10/11

3/ May 1995

Dear Sir or Madam

LOCAL GOVERNMENT ETC (SCOTLAND) ACT 1994: STRUCTURE PLAN AREAS

Introduction

1. This letter seeks the views of the new shadow local authorities on the Government's proposals for the establishment of structure plan areas as set out in the enclosed consultation paper, issued to existing local authorities and other consultees in December 1994.
2. This second stage of the consultation exercise follows a commitment given by the Government, during debate on the Local Government Etc (Scotland) Bill, that both existing and shadow local authorities would be given the opportunity to comment before a final decision is taken on the shape of the new structure plan areas.

Proposals

3. The proposals for the new structure plan areas already outlined are consistent with the Government's general approach, which has been to identify those new Council areas which could reasonably undertake structure planning functions without undermining their strategic purpose. This is in line with the main thrust of the reform proposals and the desire to avoid circumscribing the new authorities discretion through joint working. In defining the areas the view was taken that the balance of advantage lay in not splitting the new Council areas for structure plan purposes.

Responses

4. The responses to the first round of consultation have generally welcomed the Government's approach, although concern has been expressed about certain specific proposals. An outline of the main responses is attached in the Annex to this letter. The Government has noted these concerns but has decided not to respond to them until it has had an opportunity to consider the responses from shadow authorities. This will enable a balanced and fully informed view to be taken on the best way forward.

ahd00112.055

Basis for Consultation

5. Accordingly, it has been decided to make no changes to the proposals for this round of consultation and the responses made to the first consultation will be considered along with the comments received to this consultation. Any additional views from those who have already responded would also be taken into account. A copy of this letter (without the consultation document) is therefore being sent to everyone who was included in the first consultation exercise.

6. The Government wants to give the shadow authorities the maximum possible time to prepare for the new structure. Therefore, it is our intention to make the regulations designating the structure plan areas as soon as possible following this consultation exercise.

Comments

7. In order to help informed debate on the issues raised by this consultation exercise, the Department would like to make copies of responses available to the public, on request. The Department will assume, therefore, that responses may be publicly available in this way and for this purpose should be grateful if respondents would submit 2 copies of their comments. However, if respondents indicate that they wish all or part of their reply excluded from this arrangement, its confidentiality will, of course, be strictly respected, although it may be included in any numerical summary of responses received.

8. Responses should be sent to Mr Stephen Bruce, Room 6/84, New St Andrew's House, Edinburgh, EH1 3TG by 7 July 1995.

Yours faithfully



M T AFFOLTER

LOCAL GOVERNMENT REFORM: STRUCTURE PLAN AREAS SUMMARY OF RESPONSES TO THE CONSULTATION PAPER

Introduction

1. This paper summarises the responses to the consultation paper, issued in December 1994, setting out the Government's proposals for the establishment of structure plan areas. This summary deals only with comments on the proposed areas for structure planning and not with other matters raised by a number of the consultees, such as the nature of the transitional arrangements, the difficulties inherent in joint working, the relationship to public transportation and the possibilities of introducing unitary development plans.

Responses

2. Some 71 responses were received to the consultation paper, of which 48 came from local authorities, 7 from non-departmental public bodies (4 enterprise companies, one new town development corporation, Scottish Sports Council and Scottish Natural Heritage), 7 from non-governmental organisations (3 on the transportation side but also the Royal Town Planning Institute (RTPI), Scottish Society of Directors of Planning (SSDP), the Scottish National Housing and Town Planning Council (SNHTPC) and the Scottish Council for National Parks); 5 private sector bodies (Scottish Housebuilders Association (SHBA), Scottish Landowners' Federation, the chartered surveyors Bell Ingram, the Automobile Association and also the CBI who indicated that they had sought comments from members but did not write again); and 4 from individual citizens, one of whom is a well known planning consultant (Brian Parnell). Cove and Kilcreggan Community Council wrote requesting a deadline for responding but, in the event, did not offer any comments.

3. Not all planning authorities submitted comments; no responses were received from Dumfries and Galloway Regional Council, Shetland Islands Council, Orkney Islands Council, North East Fife District Council and Dunfermline District Council.

Summary of Responses

4. The proposed structure plan areas on which there were no or only minor dissenting comments were:

- * Shetland;
- * Orkney;
- * Western Isles;
- * Highland (although Scottish Association for Public Transport recommended a North Highland Zone, including Moray, and a South Highland Zone embracing most of Argyll and Lochaber);
- * Fife (although there were references to splitting the Region into Dundee and Edinburgh Travel To Work Areas);
- * Borders;

- * Dumfries and Galloway;
- * Ayrshire (although the Scottish Sports Council indicated some support for including part of North Ayrshire within the Clyde Valley and they were also supportive of separate structure plan areas for North and South Ayrshire);
- * Argyll and Bute (although see comments about Helensburgh).

Edinburgh and The Lothians Structure Plan area received general support from Lothian Regional Council, Edinburgh District Council, Midlothian District Council, Livingston Development Corporation, Railway Development Society (Scotland), RTPi and the Scottish Association for Public Transport, although they recommended adding Falkirk to this area. West Lothian District Council also supported this proposed structure plan area but argued that the best interests of West Lothian and Central Scotland would be served by moving to a combination of unitary development plans and non-statutory strategic planning for East Central Scotland or for the Central Belt as a City Region of European Significance. East Lothian District Council however, argued that the case presented for this area is weak and based almost entirely on an Edinburgh perspective.

5. The proposals on which most critical comments were received are the splitting up of Moray from Aberdeen and Aberdeenshire; the division of the existing Central and Tayside Regions into 2 areas for structure planning; and the exclusion of the Helensburgh area from the Glasgow and Clyde Valley Structure Plan Area.

Moray, Aberdeen and Aberdeenshire

6. The proposal to create a single structure plan for Moray was only supported by Moray and Gordon District Councils. It was opposed by Grampian Regional Council; Scottish Sports Council; Scottish Landowners' Federation; Railway Development Society (Scotland); and RTPi. Brian Parnell had doubts about Moray as a separate structure plan area but argued that its exclusion from Aberdeen does no material harm while the City of Aberdeen District Council believed that the 3 new Grampian authorities should jointly prepare a Regional Statement and in areas such as Moray a district-wide local plan approach, based on the information from the Regional Statement, might offer clearer planning guidance than a structure plan. The Scottish Association for Public Transport recommended that consideration be given to including Moray in a North Highland Structure Plan Zone.

Tayside

7. A number of respondents expressed support for the retention of the existing Tayside Structure Plan area; these included Tayside Regional Council, Scottish Enterprise Tayside, Scottish Natural Heritage, Scottish Landowners' Federation; Railway Development Society (Scotland) and the RTPi. Even where 2 structure plan areas were regarded as credible the strategic planning issues to the West of Dundee were highlighted; for example by Brian Parnell and Dundee District Council. SHBA also felt that splitting off an eastern portion of Perthshire and Kinross to become

part of the proposed Dundee and Angus Structure Plan Area should be considered. Angus District Council favoured linking Perth and Kinross with Dundee and Angus on the same basis as Police and Fire or, if that was unacceptable, suggested Angus and Dundee should be structure planning authorities in their own right. Dundee District Council put forward the idea of not only incorporating the eastern part of Perthshire but also the northern part of Fife and suggested that, if these arrangements are not acceptable to the Secretary of State, the existing structure plan area (ie Tayside) should be retained.

Central

8. Although the proposal for separate structure planning areas covering Falkirk and Stirling/Clackmannan was supported by Falkirk District Council and Clackmannan District Council, most consultees who responded on these proposals would prefer a single structure plan embracing all of Central Region. These included Central Regional Council, Forth Valley Local Enterprise Company, Scottish Natural Heritage, Scottish Landowners' Federation, Railway Development Society (Scotland), SHBA, RTPI and Brian Parnell. Stirling District Council, in contrast, proposed the designation of Stirling as a separate structure plan area in preference to linking it with Clackmannan.

Glasgow and the Clyde Valley

9. Glasgow and the Clyde Valley was generally accepted as an appropriate area for structure planning purposes, although several of the consultees point out that Helensburgh and the southern part of Loch Lomond were socially, economically and physically part of the conurbation and should be included within the structure plan for this area. William Morrison, on behalf of a number of Dumbarton councillors, did, however, write in support of Helensburgh remaining within Argyll and Bute. Although the SHBA did not dissent from the proposals for Glasgow and the Clyde Valley they suggested that other divisions might be considered, for example based on the Greater Glasgow/North Lanarkshire Housing Market Area which would result in Inverclyde being treated as a separate area or even combined with Renfrew. On this basis Dumbarton would also be a free standing area or combined with Clydebank and the Housebuilders also suggested that some of the western parts of Stirling District could be included within the conurbation structure plan area.

Transportation

10. It would appear, from the comments received, that the distinctiveness of the boundaries for structure planning and the Strathclyde PTA has been accepted. In particular, both the Strathclyde Passenger Transport Executive and the Clydesdale Rail Action Group supported the proposed structure plan areas.

Conclusion

11. The proposed areas for structure planning contained in the consultation appear, with a few notable exceptions, uncontroversial although a number of consultees raised questions about the mechanisms for the efficient and effective delivery of statutory strategic planning. The preferred solutions in Grampian, Tayside and Central would be to have single structure plans for the areas covered by the existing regions, although in Tayside the possibility of including the eastern part

of Perthshire with the Dundee and Angus Structure Plan attracted some support. Consultees also appeared to favour the Helensburgh area being included within Glasgow and the Clyde Valley for structure planning purposes.