



Our Ref: 1240.2.10

Your Ref:

10 March 2008

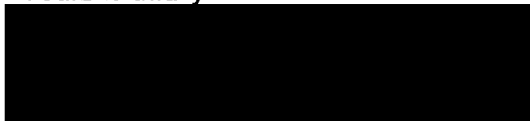
Freeport RRHE-GBSA-BJLR
National Planning Framework Team
The Scottish Government Directorate of the Built Environment
Victoria Quay
Leith
Edinburgh
EH6 6QQ

Dear Sir/Madam

Response to National Planning Framework for Scotland 2 Discussion Draft

I have pleasure in enclosing a copy of our response to National Planning Framework for Scotland 2 Discussion Draft made on behalf of Banchory & Leggart Estates and Edinmore. I can confirm that we are content for the response to be made public. If you would prefer an electronic copy of the response please let me know.

Yours faithfully



Neil Sutherland

Encs

CC Rupert Lumsden, Jon Lambert

**National Planning Framework for
Scotland 2**

**Representation on behalf of
Edinmore and Banchory & Leggart
Estates**



PPCA

Chartered Consultant Town Planners
and Landscape Architects

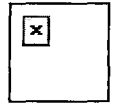
25 Alva Street
Edinburgh EH2 4PS

Email enquiries@ppca.co.uk
Tel 0131 225 1225
Fax 0131 220 1773

**National Planning Framework for
Scotland 2**

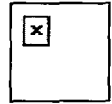
**Representation on behalf of
Edinmore and Banchory & Leggart
Estates**

Job reference: 1240.2.10
Date: February 2008



Contents

1. **Introduction** 3
2. **Economy and Employment Land** 3
3. **Housing** 4
4. **Transportation** 6
5. **Conclusion** 7

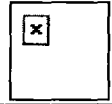


1. Introduction

- 1.1 PPCA Ltd has pleasure in enclosing our response to the recently published National Planning Framework 2 Discussion Draft. The response is made on behalf of Banchory & Leggart Estates, Aberdeenshire and Edinmore.
- 1.2 The responses are grouped by topic (economy and employment land, housing, transportation) and where practical the draft NPF2 paragraph numbers are referred to for ease of reference.

2. Economy and Employment Land

- 2.1 Paragraph 43 of draft NPF2 states that the Aberdeen economy is restructuring as oil extraction related business begins to decline. Although the Aberdeen economy is currently very buoyant there is clearly a need to diversify to ensure the economy is not unduly slowed by declining oil extraction on the North Sea. As the decline in North Sea oil production is to a large degree predictable it is essential that steps are taken by Government, the Council's, public bodies and by the private sector to do all they can to build on the regions strengths now. Positive steps have already been taken such as the creation of the public/private Aberdeen City & Shire Economic Forum (ACSEF). Aberdeen City and Aberdeenshire Council and the private sector will benefit from the clear message in NPF2 (paragraph 75) "The primary purpose of the Scottish Government is to increase sustainable economic growth". This clear message will allow all parties to commit budgets and resources in the knowledge that the Government is committed to the region and its future.
- 2.2 As well as benefiting employment, businesses and local and national Government Economic growth can also bring benefits to the environment, infrastructure, facilities and services. The proposed objectives (wealthier and fairer, greener, safer and stronger, smarter and healthier) specified in paragraph 78 of draft NPF2 define how wealth creation will be spread throughout Scotland. These objectives, although broad in scope, do help illustrate that local communities stand to share in the benefits economic growth will bring. In order to establish any meaningful benefits larger development sites are required to create the necessary critical mass of people, services and finance to fund improvements.
- 2.3 Paragraph 79 states that businesses choose to locate where they can recruit well educated, talented people and venture capital flows to places which have the sort of physical and social infrastructure which supports innovation. This is a fact that must be taken on board when devising Development Plans. Development Plans have for too long focused on quantity of land for both employment and housing land as opposed to quality of land. In paragraph 165 it is stated that "Across Scotland there is already a plentiful supply of land for business and industrial development". This is not the case. In terms of quantity of land there may be statistically sufficient land however this ignores the qualitative aspect of site selection for employment uses. Account must be taken of the quality of land, which in the case of employment land includes

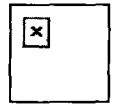


landscape quality, accessibility, visibility, existing or proposed facilities and infrastructure. These qualities are important because they directly influence the decision to locate made by businesses, along with proximity/accessibility to and attractiveness to the existing work force. If employment land is allocated in the wrong places it will struggle to attract end users and will not encourage venture capital or vibrant sustainable economic growth. As is recognised by draft NPF2 businesses will simply not locate where their qualitative requirements are not met, and those with higher qualitative requirements tend to be those that offer the highest paid and most dynamic jobs. In areas such as Aberdeen and Aberdeenshire there is an existing pool of well paid and highly educated staff some of whom will inevitably be looking for alternative employment as oil restructuring occurs. It would be a devastating and avoidable mistake if the emerging Aberdeen/Shire Strategic Development Plan did not demand that sufficient high quality employment land is found to address the chronic shortage of employment land in Aberdeen and Aberdeenshire, accommodate restructuring businesses and provide an attractive destination for new and innovative businesses as a top priority. With such a policy in place the chance of capitalising on the existing highly skilled workforce significantly improves, as does the opportunity to attract new businesses and staff to the region and to create an environment that encourages new and existing innovative businesses to flourish. As is discussed in paragraph 2.2 above sustainable economic growth will bring tangible long term benefits to local communities as well as Scotland as a whole.

- 2.4 Paragraph 143 recognises the contribution that universities, higher education institutions and further education colleges make to the economic strategy by developing the skills required to support a knowledge based economy. In Aberdeen/Shire the educational institutions should continue to consider carefully the skills their students will leave with in light of restructuring within the oil sector. In terms of the Development Plans allowance should be given to educational institutions to expand or restructure.
- 2.5 It is therefore considered that NPF2 should provide clear guidance in the section on Spatial Perspectives that given the particular historical emphasis on the oil based industry in the Aberdeen region that future development plans should pay particular care to ensure that the needs of the restructuring economy are fully addressed.

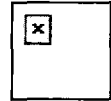
3. Housing

- 3.1 Paragraph 54 recognises that high house prices constrain people's tenure choices and restricts economic competitiveness, limiting workforce mobility and skewing wealth towards the top end of the housing market. Edinburgh is singled out as a particular problem area. NPF2 should recognise that in Aberdeen and Aberdeenshire house prices are also particularly high, with the pressure being compounded by a lack of suitable housing land in the city, particularly for non-flatted accommodation. The fall in population in Aberdeen City at a time when the economy is strong is likely to be in part due to a critical lack of appropriate and affordable housing within the



city boundary. People's tenure choices are therefore restricted and the result is that people are being forced to move into Aberdeenshire, hence in part the rapid population growth being experienced there. As is acknowledged in paragraph 54 lack of affordable housing and housing land can affect the ability to retain the existing population and attract new residents with the skills to support diversification. Aberdeen is clearly a case in point and as noted in section 2 above action is required to mitigate and then reverse this process. As is stated above the economy of Aberdeen and Aberdeenshire is undergoing diversification. This process would be critically hindered if sufficient quality housing land is not found to accommodate the range and choice of housing required to address the pent up local housing demand and to provide high quality housing in a high quality environment essential to attract new workers to build on the economic success of the region.

- 3.2 The recognition in paragraph 99 that household projections do not identify the number of households that are prevented from forming through the absence of opportunity to do so is welcome. The simple fact is that house prices continue to escalate far faster than inflation throughout the country, with some hotspots excluding a significant and growing section of the community from home ownership, and to a lesser degree hindering people wanting to move up the property ladder and so further reducing the availability of smaller properties. Clearly the supply of housing is far exceeded by demand and therefore simple housing projections are not accurately reflecting demand, notwithstanding the stance taken by the majority of Councils to date. The direct result is that communities are being failed by the planning system. This failure is recognised in draft NPF2 and a clear message is given in paragraph 100 that the Government expects *"...the planning system to ensure that the supply of land for new housing development in an area is adequate to meet the housing needs of that area in full and that the land is made available in good time, that new residential development is of a high standard and sustainable, and that there is adequate provision of physical and social infrastructure – affordable housing, high quality schools and services. It will also be important to ensure that the right houses are built in the right places, taking account of changing household composition."* Paragraph 169 goes on to specify that the annual supply of housing is to increase from 25,000 per year to 35,000 per year. Now that the issue has been recognised by Government it is crucial that clear mechanisms are put in place to ensure that the level of appropriate housing required is delivered in a timely manner. Scotland's track record in delivering housing and development plans in a timely manner is not always a good one. It would be helpful if some reference to the required mechanisms could be made in NPF2 so that planning authorities, developers and the local community can be clear that from Scotland's principal planning document down that the matter is being consistently addressed.
- 3.3 Paragraph 170 recognises that it is not just the volume of housing but the right type of housing in the right locations that requires to be addressed. Strategic planning will be essential to ensure that this is achieved. Council's will require to think on a regional housing market level rather than focusing on administrative and political boundaries. Consideration should also be given on how to speed up housing delivery. One mechanism for achieving this could be for future Strategic

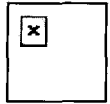


Development Plans to allow development of identified strategic sites in advance of local development plans, subject to a masterplan and any other appropriate controls. The lack of such flexibility in the current structure plan NEST has led to many of the difficulties experienced in the area.

- 3.4 Paragraph 180 acknowledges that although brownfield redevelopment is encouraged there is far more scope for brownfield development in the west of the country. Clarity should be given in NPF2 that although desirable the drive for brownfield redevelopment should take account of the level of brownfield land available, the length of time it would take to remediate and service that land, the level of housing pressure and the requirement for providing a range and choice of housing land. In the past in Edinburgh and Aberdeen have heavily promoted brownfield land at the expense of green field land. Due to remediation and servicing costs the vast majority of that development is flatted and does not serve families or the elderly well. In Edinburgh there have been so many flats released on brownfield land that the market has become flooded and development has stalled. A more balanced response is required if these imbalances are to be avoided and the public better served by the planning system. It should be recognised that the development of pockets of brownfield land may obviate the opportunity for key items of infrastructure to be provided through larger-scale development. Windfall sites are a fact; but attempts should be made to allocate appropriate sites through the development plan so that, for example, the types of housing can be related to spare infrastructure, e.g., schools with falling rolls.

4. Transportation

- 4.1 One aspect of transport planning that is not mentioned in draft NPF2 is the need for strategic transport planning to be integrally linked to land use planning. At the moment the Scottish Trunk Road Authority take no account whatsoever of any future strategic development unless it is included in the current development plan. This procedure therefore completely ignores all emerging strategic development when planning new roads and junctions. As a direct result of this many developments with full Council support such as Winchburgh face significant difficulties in securing required trunk road access because the local plan is not yet adopted. In the case of Winchburgh this delay is in danger of impacting not just on West Lothian but on the whole region as strategic cross boundary educational requirements could be put in jeopardy. A radical re-think is required in the way in which we plan not just strategic development to meet the nations needs, but also in the way in which key infrastructure is planned and delivered. One part does not work without the other, therefore if this matter is not addressed now the new planning system is doomed to failure as it will not be able to deliver development on the ground. Perhaps one way to address this issue would be to adopt a similar approach to English Partnerships.
- 4.2 Paragraph 117 and 118 promotes the idea of accessibility to education, employment and services in compact settlements with mixed use development served by efficient public transport systems.



These ideals are well established and no objection is raised to them. The idea that commuting can best be reduced by ensuring that employment uses are located close to housing areas is a positive solution and one that strategic development plans should strive to achieve. Park and ride facilities on edge of town sites located adjacent to existing or proposed business parks can assist sustainability by catching commuters driving into a settlement and their busses can return from the settlement with workers commuting to the business park.

5. Conclusion

- 5.1 The principal NPF2 vision of delivering sustainable economic growth in Scotland is a positive vision that can deliver improvements to the environment, society, the economy and to Scotland's standing on the European and World stage. Draft NPF2 does to a large degree set a positive and practical agenda to deliver this vision. The contents of draft NPF2 are therefore supported. There are nonetheless important omissions, particularly on the importance of ensuring that the restructuring economy of the Aberdeen Region is properly supported and the importance of ensuring that strategic transport planning and strategic land use planning can work together to deliver this vision, rather than the current position of each working in isolation to the other. These omissions should be addressed in the final version of NPF2 to ensure that the vision can become a reality.