

East Lothian

Council

**Environment Department
Planning & Building
Standards**

**NATIONAL PLANNING
FRAMEWORK 2
2008: Discussion Draft**

**Comments on a
consultation from the
Scottish Government**

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EAST LOTHIAN COUNCIL

RESPONSE TO THE SCOTTISH GOVERNMENT'S CONSULTATION ON DRAFT NATIONAL PLANNING FRAMEWORK 2, 2008, JANUARY 2008

1. NPF2 provides a useful strategic overview of the government's priorities for development in Scotland over the period to 2030. It sets out, in broad terms, the main drivers of the economy, the main areas of growth and the strategic infrastructure required to support this.
2. It can be argued that the plan is very much a 'light touch', perhaps too light. Its identification of national developments is at a very high level. The nine proposed national developments are noted. However, in view of NPF 2's emphasis on the importance of the East Coast Corridor between Aberdeen and Newcastle, the Council is surprised that neither the ongoing dualling of the A1 to Newcastle nor capacity improvements to the East Coast Main Line are included. The electrification of the main Edinburgh to Glasgow line would also seem to be an omission.
3. The Council would also support the inclusion of strategic waste management facilities as being developments of national importance where these were consistent with the National Waste Plan or an Area Waste Plan.
4. The draft plan is also light on the spatial distribution of growth. It is not specific about the levels of new development it expects local authorities to plan for. This would have provided a useful context for the strategic development plans and enabled their subsequent growth targets, particularly for housing, to be justified in this wider context. The draft NPF2 considers estimated projections of population and households at the national level but does not attempt to consider these at a sub-national level.
5. In this context there is no particular debate about the merits or otherwise of seeking to redirect growth in Scotland. There is no substantive discussion about the appropriateness of allowing the high levels of growth in the Edinburgh city region to continue, or whether there is any merit in planning for this growth to be more widely spread or redirected. The strategy does seem to be to a continuation of present trends, albeit with a recognition that this should be reflected in targets for greater economic and population growth and greater overall household growth than current projections indicate.
6. In referring to draft SPP3, *Planning for Housing*, NPF2 re-iterates its call that local authorities should ensure a generous supply of land for future housing development. While no-one would deny the need to ensure everyone in Scotland has access to a home they can afford, there is no attempt to define 'generous' or to give a more detailed spatial context to

the Government's desire to increase the rate of new supply to at least 35,000 dwellings per annum by 2015.

7. That said, the Council welcomes the emphasis given to the provision of affordable housing. Recognition of the particular problems of the Edinburgh and Lothians area is noted and supported. The statement that recent investment in affordable housing does not mirror the geography of need is an important one and the Council waits with interest to see how the Government will follow this up in a positive manner.
8. References to PAN 74, *Affordable Housing* and its 25% benchmark figure for the provision of land for affordable housing in new developments may require to be reconsidered. Should draft SPP3 methodology be adopted, then the possibility has to be countenanced that in some areas the affordable housing requirement that has to be addressed may require a greater level of provision than this figure would allow for.
9. The recognition of the importance of the deliverability of infrastructure is welcomed. In this regard, NPF2's statement that, generally speaking, lack of capacity in water and drainage infrastructure should no longer be a significant constraint or delay on development in Scotland, is particularly important. Again, however, inclusion in the draft plan of more specific sub-national economic and housing targets would give infrastructure providers as well as local authorities a clearer and earlier guide as to development focus and infrastructure investment requirements and priorities.
10. The priority afforded the preparation of the Edinburgh city region strategic development plan is noted. The Council re-iterates the concerns it expresses in relation to draft SPP3, *Planning for Housing*, as to timescales and evidence base. There is insufficient recognition of the volume and nature of the work required to undertake draft SPP3's housing land requirement methodology, such that a proposed SDP can be submitted to Scottish Ministers in the timescales envisaged while at the same time demonstrating the evidence base required to withstand examination.
11. The Council notes that the final published version of NPF2 will contain an action programme setting out how, when and by whom the strategy will be implemented. This Council is concerned that the strategy as developed to date may not give sufficient locational and quantitative guidance to enable the required investment priorities to be established. This will largely fall on the strategic development plans for the four main city regions. There is a danger that, without this more detailed guidance, these plans will be more influenced by the availability of infrastructure capacity rather than what might be the optimum land use planning solution developed within a national context.
12. The Council therefore hopes that approved NPF2 will contain more specific sub-national employment and housing land requirement guidance, as well as a greater range of national developments. There is

no specific national spatial strategy or phasing and timing framework for the provision of infrastructure and funding for growth, against which local authorities can confidently devise a phased forward planning spatial strategy, and to which other agencies can align investment decisions. To have an effective and modernised Development Planning system, it must be based on a national spatial strategy establishing the quantum and type of growth expected in particular areas and the alignment of national funding streams to ensure the its delivery in selected locations on time.

***Director of Environment
East Lothian Council***