

Places, People and Planning  
Draft Nestrans response to the consultation  
14/3/17

Key Questions

In response to the key questions :

“Do you agree that our proposed package of reforms will improve Development Planning? Please explain your answer.”

“Do you agree that our proposed package of reforms will increase community involvement in planning? Please explain your answer.”

“Will these proposals help to deliver more homes and the infrastructure we need? Please explain your answer.”

“Do you agree the measures set out here will improve the way that the planning service is resourced? Please explain your answer.”

We would offer the following comments.

**1. Introduction**

Nestrans is the Regional Transport Partnership for the north east of Scotland covering the geographical areas of Aberdeen City and Aberdeenshire Councils. This encompasses just under 10% of both the population and land mass of Scotland.

This response has been prepared following discussions with colleagues across both Aberdeen City & Aberdeenshire Councils and the Strategic Development Planning Authority for the north east of Scotland. It is consistent with views from these partner organisations and also consistent with the response from the north east to the Stage 1 review of the Enterprise/ Skills Agencies.

This response concentrates on the issues from the consultation relating to transport.

This part of our response considers the strategic governance issues arising from the consultation and forms our response to the key questions above . Annex A discusses some of the more technical issues raised.

**2. Background**

**2.1 Infrastructure First**

In principle there is support for the over-riding view from the Review Panel and the consultation that an infrastructure first approach should be adopted. We would however caution that, particularly in a region like ours of fast growth, changing the system may well bring about improvement but the main issue with infrastructure provision will remain one of funding.

The north east of Scotland has experienced considerable growth due to the nation's requirement to extract oil and gas from the North Sea. This private sector led growth has outstripped the region's ability to match the private sector requirements from the public sector. Transport infrastructure is one of the key areas that has lagged behind economic expansion.

There may well be improvements to be gained through restructuring the Planning System by better aligning development and infrastructure provision however this alone will not resolve the misalignment between the rate of private sector investment and the public sector's ability to facilitate this with the appropriate infrastructure. There has been over the years a significant funding gap related to infrastructure provision and with further growth still anticipated there will still be a funding deficit.

## **2.2 Creating a single voice for the north east of Scotland**

The north east of Scotland has an almost unique geography and environment. It is a one city region with the distance to other centres in Dundee and Inverness far enough away to ensure there is relatively little competition for the region. Businesses are generally in the north east because they want or need to be here, being located elsewhere isn't a viable option. It also has a particularly successful energy industry based within it. This along with other outward looking sectors such as food & drink and bio-pharma means that our region relies more heavily on connectivity than other parts of the country. That connectivity includes connecting to other parts of Scotland, the rest of the UK and a high reliance on international connectivity.

Given this lack of competition, the region has, over many years, developed a very strong bond between its City, the regional centre, and its surrounding country. Aberdeen City needs Aberdeenshire and Aberdeenshire needs Aberdeen City.

The rapid and extensive growth in the region, due primarily to the energy industry, has been spread across the Aberdeen travel to work area and in part beyond that. Expansion in the City has been matched by expansion of the Aberdeenshire towns. This, with an extremely limited rail capability, has led to a considerable road traffic commute from Aberdeenshire into Aberdeen City. However, with the development of industrial estates and business parks on the edge of Aberdeen and in the Aberdeenshire towns this has led to a considerable counter commute.

Such an expansion, with over a 33% increase in population since 1970 across the region, does create tensions. These tensions existed between the Councils, businesses, communities and the media. To attempt to resolve these tensions the two Councils, recognising their mutual interests, agreed to take a regional perspective on these growth issues as they affected economic development, spatial planning and transport.

It was agreed that to benefit the region, the region needed to agree on a strategy for moving forward and to a large extent speak with a single voice reflecting the aspirations of our communities, businesses and Councils.

This regional partnership working has evolved over the years through various incarnations from officer joint working, involving business organisations and Scottish Enterprise to voluntary and on to statutory bodies as plans developed. The economic plans have been developed in conjunction with the business community and the transport strategies developed with business and wider community interests represented in decision making. There has been close liaison between all regional partnership groups and with the Councils - with cross group membership at both Member and officer level.

One of the successes of the regional partnership working in this area has been that the partnerships have been seen to be working to bring the Councils together, with other bodies, to agree a common approach. They haven't tried to be nor been seen as a level of governance between national and local, rather a true partnership between local authorities.

The success of these various bodies can be seen in a general view that the north east, in its entirety, has a vision for how it would like to move forward and is able to articulate that vision across the various sectors of society. We have regionally agreed, properly functioning strategies, accepted by local and national governments, on Economy, Strategic Development Planning and Transport, all covering both Council areas. There is then a strong feeling of “if it ain’t broke, don’t fix it”.

We do accept that whilst the region has worked successfully in the past, this does not mean that we should be complacent about the future. Rather there is a recognition that there are always improvements that can be made to services, as evidenced by the changes that have been made over the years, but that these improvements should build upon the successes that have been achieved (where these exist) in a way to try and eliminate the areas of weakness.

### **3 Building upon existing successes**

To build upon success and reduce weakness you first have to identify those successes and weaknesses. For the north east of Scotland these include:

#### **3.1 Economic Development**

Through various iterations, the north east produced the Aberdeen City and Shire Economic Future (ACSEF). This was a public/ private sector partnership.

The major success of ACSEF was to give the private sector a strong voice in the development of the economic strategy for the region. Through ACSEF the Councils were able to reach a significant part of the business community and to agree an over-arching approach to the economic development of the region. This was a very significant step towards agreeing a single voice message for the north east. On reflection part of the issues with ACSEF could have been an imbalance between the public and private sectors on its Board.

ACSEF had been intended to bring in the private sector to deliver and in some cases part-fund projects. It didn’t succeed in this effort. This may have been due to the (necessary) concentration on the wider strategic path for the north east rather than the more project focus which could engage the private sector as deliverers and funders. This has been addressed by the creation of Opportunity North East (ONE) which, as a private sector body, is working with the two Councils and Scottish Enterprise on delivering the projects in the City Region Deal and bringing private sector investment to the table.

Having established ONE, ACSEF has been disbanded although a Team of officers and private sector still exists as a Regional Economic Strategy Group. This Group has members from land use planning, transport and economic development as well as Chamber of Commerce, Education and Skills.

#### **3.2 Spatial Planning**

Following a number years of relative inactivity in the non-statutory stage of the development of joint working arrangements, through the Strategic Development Planning Authority, our two Local Authorities have together produced firstly a region-wide Structure Plan and latterly a Strategic Development Plan. This joint working on producing these statutory documents has been pivotal to the two Councils in agreeing the narrative for the north east’s single voice.

This is an issue of particular importance in the north east due to the lack of competition referred to in section 2.2 above. This means that the region's Strategic Planning is working directly towards the needs of the region without distraction of competing for development with other regions. This arises due to the economy of the region, heavily influenced by the energy sector, and the geographical distance from other population centres in Scotland.

Within this context, the relationship between the business sector and the Councils is particularly important. The business sector is heavily involved in setting the economic strategy for the region with its insight to future business trends, without the distraction of alternate places of operation, and has a keen interest in how this translates into the spatial plan for the region.

For the business sector, the statutory nature of the Strategic Development Plan gives comfort that their efforts in helping to develop the Regional Economic Strategy, and ensuring it is taken properly into account in the Strategic Development Plan, follow through to the Local Development Plans.

### **3.3 Transport**

The North East of Scotland Transport Partnership (Nestrans) started life as a voluntary partnership developed from the transport element of the North East of Scotland Economic Development Forum (NESEDF). It included Councillors from both Councils, Scottish Enterprise and the business sector through the Chamber of Commerce.

This voluntary body was instrumental in developing the Modern Transport System for the region (2003) at a time when there was a gap in the development of Structure Planning. This was an essential tool in making the case for the Aberdeen Western Peripheral Route and the other interventions required to permit the rapid growth the region was experiencing.

When Nestrans became a statutory body in 2006, it developed the statutory Regional Transport Strategy incorporating the Modern Transport System. The successes of Nestrans (in both voluntary and statutory guises) are therefore in the initial development of the Modern Transport System and, by 2019, in the delivery, by partners, of a large part of that original Modern Transport System.

Nestrans, as a statutory body, has also been a useful body in terms of improving relations between the north east and national bodies such as Transport Scotland (Road and Rail divisions), Network Rail, ScotRail, as well as local bus operators, local business organisations, freight interests, harbours and airport. This has been particularly so for services that are serving the north east rather than a specific council area. It has proved useful for bringing the councils together to agree positions on these national provision of services.

An interesting dynamic for Members of the Nestrans Board as a statutory body is that at this body, because it is statutory, Members are representing the whole Nestrans area rather than representing their Council ward or Council. This is a matter for consideration when considering what format any future regional partnership working might take.

### **3.4 A common region-wide approach**

All the regional services that both councils have been fully engaged in have shared a common theme. They have all tried to work, as the Regional Transport Partnership legislation requires, to reach a consensus on what is best for the region. Members have

been, over the years, very good at working towards this consensus and not bringing the perhaps more adversarial politics that can sometimes appear within their Councils.

The input from the business communities has been perceived as a positive to the process of agreeing the vision for the north east and achieving a single voice for our region. This has also been enhanced by the very positive contribution to the transport discussions by the non-councillor Members of the Nestrans Board, both in its voluntary and statutory guises. This should be a matter for consideration in developing proposals for the future.

#### **4 Where next?**

Looking forward to the Planning Review consultation proposals, bearing in mind the limitation of the infrastructure first proposal, it can be seen that the north east has been significantly involved in regional partnership working to date and that this has been beneficial. This has been the case for both voluntary and statutory bodies, although consideration should be given to why the evolution of this partnership working has tended towards statutory body status.

Consideration of this point should also include consideration of the Scottish Cities Alliance's call for further devolution of powers to the City Regions through their Empowering Scotland's Cities, Empowering City Government June 2016 publication.

Due regard will have to be taken of the National Transport Strategy's (NTS) review of "Transport Roles and Responsibilities". This Working Group is currently scheduled to report towards the end of summer 2018 according to the timetable that Transport Scotland have been consulting upon. It is therefore difficult to form firm views on some of the issues within this Planning Review without understanding what the NTS review might look like. That part of the NTS review and this part of the Planning Review should run together.

Despite the limitations imposed by the NTS Transport Roles and Responsibilities review, it is still possible to consider some of the questions raised in the Planning Review consultation.

##### **4.1 Economic Development**

The north east experience has shown that having a regional perspective on the strategic elements of economic development is essential. This has enabled a business perspective to be fully considered and embraced and created a "we're all working together" attitude that has served the north east well. This can only really be achieved at the regional level as from the business perspective the existing local authority boundaries between Aberdeen City and Aberdeenshire Councils are largely arbitrary.

##### **4.2 Infrastructure**

At this time, it is difficult to give firm views on the consultation's considerations on infrastructure and proposal for a national infrastructure agency or infrastructure audits since transport is a significant part of infrastructure and the NTS review of transport governance hasn't yet started.

Paragraph 1 highlights that the main issue for infrastructure is one of finding adequate funding. Changing the Planning System alone isn't going to resolve this issue.

In Transport Scotland there is already a national agency which, through its National Transport Strategy and Strategic Transport Projects Review, provides an audit of nationally important transport infrastructure. This is carried through to the regional level with the Regional Transport Strategies produced by the Regional Transport Partnerships.

It is not clear whether these documents will continue to exist as transport documents or whether the Planning Review proposals assume that transport will be subsumed into an overall infrastructure theme. Given transport's role as a very significant enabler of economic development and spatial planning, there is a strong case for having transport as a separate consideration to be reviewed under the NTS review.

### **4.3 Strategic Development Planning**

As discussed at 3.2 above, the Strategic Development Planning process has been beneficial to the north east. It has brought together, at the strategic level, the Councils, business, communities and importantly for Nestrans, the transport sector to agree a spatial plan for the region. It is important that these processes and discussions produce a tangible output so that participants can see that their inputs have a standing and are therefore translated into the Local Development Plans. At Local Development Plan level vested interests are more acute.

For the north east it is also important to recognise that decisions on the development of the north east are taken at the regional level since it is patently clear that what happens in one Council area has significant impact on the other. The Strategic Development Planning process along with regional strategies for economic development and transport ensure that the Councils and their businesses and communities consider the need for and the impacts of development across the whole area of those impacts. Further, it is essential that the Councils work together for a common goal rather than end up competing against each other thereby alienating the business community. This is consistent with the intention of the Scottish Cities Alliance proposals for City Regions mentioned above.

Given that, on the whole, development in the north east is not subject to competitive pressures from alternate locations, as discussed at 2.2 above and in a similar way to development in Scotland's islands, it is important to consider how and where decisions on this development is taken as well as the implications for these decisions on the Councils just discussed.

Proposals for removing the requirement for a Strategic Development Plan through creating an enhanced National Planning Framework have the potential to have a negative impact on the joint collaboration between the Councils and between the Councils and their businesses and communities. Decision making in the relatively isolated nature of the region is likely to be better received if made regionally.

Although the consultation makes considerable reference to regional priorities set by regional partnership working, it is not clear how these regional priorities will be included in any enhanced National Planning Framework or the status that will be attached to them. Phrases such as "help to" and "work with" suggest a collaborative approach, but there is no indication of how this would actually work in practice if regionally there was a differing view to a national view.

### **4.4 Outside influences**

The positive experience of having good involvement of the business community in the strategic direction for the region and the similarly positive experience of the impact of the non-councillor Members of the Regional Transport Partnership should be given full consideration in any proposals for changes to the systems.

Equally appropriate, consideration should be given to ensuring the Local Outcome Improvement Plans of the Community Planning Partnerships are properly considered by the any new systems.

#### **4.5 Statutory or non-statutory**

There are many methods of setting up regional partnership working be that by some voluntary method or statutorily placing a duty on Councils. This though perhaps isn't the most important factor and is perhaps best decided by national and local government giving due consideration to the points made above. More important than the make-up of any group or body is the status of what it produces and how that will subsequently be used by both national and local government.

It would be hoped that in considering the appropriate method of creating regional partnership working, decision makers would seek to build upon what has worked well before, why it has worked and what could be done to make it work better. Some of these considerations have been articulated above. It is accepted that some of these considerations may be contradictory.

It could be anticipated that different solutions would be appropriate for different parts of the country. The independent panels review highlighted this for the islands but this is true also for differing parts of the Scottish mainland. Indeed the current system has some parts of the country with Strategic Development Plans and some parts without. It also has differing variations of regional transport partnerships. Therefore it can be concluded that differing systems to suit differing areas may be appropriate.

#### **4.6 Tangible outputs**

Whatever approach is taken to developing the new Planning System, for Regional Planning Partnership work to have any real and significant impact its outputs should have some status. This is required to make this partnership working meaningful for both the national bodies and the Local Authorities.

There could be a requirement to produce a regional economic strategy, a regional development plan and a regional transport strategy. This might include an infrastructure audit dependent upon decisions on a national infrastructure agency, its remit or the refocusing of the remits of the SDPA (or other body set up). This requirement could be different for different parts of the country dependent upon their different geographies and economies. Consideration could be given to a different form of document describing regional priorities across the range of regional considerations.

Whatever the output required it should be of a standing to encourage participation by business, communities and Councils. Those participating in regional partnership working should feel they are taking part in a worthwhile exercise which has impact and those receiving the output should be obliged to take due cognisance of that work in their subsequent economic and planning policy development and infrastructure planning and implementation.

#### **4.7 Links to national policies**

It has already been highlighted that this Planning Review doesn't sit in isolation from other aspects of government review or from other local government considerations. Related considerations include:

- The National Transport Strategy Review (where transport governance is being considered);
- The RPP on Climate Change (where transport is a significant consideration);
- The Transport Bill;
- Roads Collaboration Programme (where local authorities are developing collaborations across the transport sector);
- Various frameworks under consideration (including the low emissions framework and the Active Travel Task Force);
- Various strategy consideration (including the Industry and Enterprise).

## 5 **In Summary**

Key points are:

- There has been successful region-wide working in the north east of Scotland across planning, economic development and transport.
- This has been engendered by its relatively unique geographic situation, as well as the needs of business and industry, and the complementary relationship between the two local authority areas.
- Future arrangements need to build upon past successes and experiences.
- However, it cannot be assumed that an identified need for region-wide work is a necessary and sufficient condition for it to be success on its own.
- It is suggested that any proposed revised regional working arrangements require a clear rationale and specific outputs, and that these should have relevance to both local authorities and national governments.
- Any outputs from regional partnership working also need to be associated with a certain degree of status ensuring that regional considerations influence national plans, but are also relevant to local authority policies and plans.

The Planning Review consultation is naturally written from a planning context, whilst this response is considering those issues from a transport point of view. Whilst Transport and Land Use Planning are inextricably linked, the questions proposed in the consultation are written from that planning perspective. This response therefore has picked out those proposals in the document where a transport comment is appropriate.

The proposals where transport is most closely affected are:

### **Making plans for the future.**

2\_\_\_Regional partnership working. We believe that strategic development plans should be removed from the system so that strategic planners can support more proactive regional partnership working.

3\_\_\_Improving national spatial planning and policy. The National Planning Framework (NPF) can be developed further to better reflect regional priorities. In addition, national planning policies can be used to make local development planning simpler and more consistent.

5\_\_\_Making plans that deliver. We can strengthen the commitment that comes from allocating development land in the plan, and improve the use of delivery programmes to help ensure that planned development happens on the ground.

### **People make the system work.**

6\_\_\_Giving people an opportunity to plan their own place. Communities should be given a new right to come together and prepare local place plans. We believe these plans should form part of the statutory local development plan.

9\_\_\_Keeping decisions local – rights of appeal. We believe that more review decisions should be made by local authorities rather than centrally. We also want to ensure that the system is sufficiently flexible to reflect the distinctive challenges and opportunities in different parts of Scotland.

### **Building more homes and delivering infrastructure.**

10\_\_\_Being clear about how much housing land is required. Planning should take a more strategic view of the land required for housing development. Clearer national and regional aspirations for new homes are proposed to support this.

13\_\_\_Embedding an infrastructure first approach. There is a need for better co-ordination of infrastructure planning at a national and regional level. This will require a stronger commitment to delivering development from all infrastructure providers.

15\_\_\_Innovative infrastructure planning. Infrastructure planning needs to look ahead so that it can deliver low carbon solutions, new digital technologies and the facilities that communities need.

Nestrans would comment on the proposals in these categories as follows:

### Making plans for the future

The following statement is included in the consultation:

- At present, many plans are considered to be out of date by the time they are adopted – we need plans that can keep pace with the way that society works today.

However, also included is the following statement:

Requiring local development plans to be reviewed every 10 years. & Making provision for plans to be updated within the 10-year review cycle.

Whilst the first statement is made within the context of the time taken to develop the existing Local Development Plans it is not clear how, even with the possibility of frequent updates, a ten year plan will achieve “that can keep pace with the way society works today”.

This comment is made with respect to Regional Transport Strategies. Should the requirement for these strategies, or any other replacing Regional Partnership Priorities documents, be set to match the Local Development Plan timetable, Nestrans considers this timescale too long.

The consultation includes: focus on delivering outcomes rather than following lengthy and complicated procedures. and

A much wider range of stakeholders

Widening the range of participants and including Community Planning in the process is supported. Also supported is a focus on delivering outcomes.

The document comments: Strategic development planning authorities have no duties or powers to make sure their plans have a strong influence. and

strategic development plans are removed from the system and that we should focus instead on co-ordinating development and infrastructure at this scale

As outlined in the main body of this report, Strategic Development Planning has served the north east of Scotland well bringing the two Councils together to agree a strategic plan for the region along with the region’s business community which doesn’t recognise the border between the Councils. There is therefore concern that taking strategic planning to the national level via the National Planning Framework could damage this relationship between the Councils and between them and the region’s business community.

The consultation then discusses: support cross-boundary collaboration, and improve the co-ordination of strategic development and infrastructure priorities

Planners working at a regional scale should play an active role in partnership working. Strategic planners could add significant value by helping to shape future spatial priorities for investment and providing timely evidence to support stronger joint decision making.

supporting a clear dialogue between national and local tiers of government. Working together at a regional level would also allow local authorities to combine resources and share potential risks.

We agree that strategic development plans should be removed from the system, so that planners can better respond to and be involved in wider regional partnership working. Instead, we propose that the National Planning Framework (NPF) sets out regional planning priorities.

The document is clearly proposing that Local Authorities work together at a regional level. This part of the proposal is supported. What is not clear is:

- What form this regional partnership working would take. For example there could be a regional body or an informal working arrangement between Councils
  - The main body of this response points to a regional body or bodies, but suggests that the most important aspect for regional working is that the outputs from the Regional body or bodies has some standing to influence both local and national governments. This would ensure that the working relationship between Councils and between Councils and the business community was maintained.
- Who would decide the regional priorities to be included in the NPF, Scottish Ministers or the regional partnership working (whatever arrangement was agreed)
  - One of the reasons that regional working has followed a fairly successful path in the north east is that this work has been seen as a true collaboration between the Local Authorities incorporating the views and needs of the business community. The work has to be seen as representative of the region's views rather than a level of government imposing upon Local Authorities.
  - Scottish Ministers over-ruling a regional view on the regional priorities as included in any enhanced National Planning Framework or the regional work being perceived as an extension of national government in the regions would be detrimental to the north east of Scotland.
- What status the work of the regional partnership would have. Currently the Strategic Development Plan and the Regional Transport Strategy are statutory documents. What would be the status of any future documents produced by regional partnerships?
  - As described above and in the main body of the response regional partnership working is supported but this has to be regional partnership working with a purpose. Clearly these documents need to align with national priorities as set out in national statutory documents however they must reflect the differences of geography and economy of the differing parts of the Country. They must have a standing within the hierarchy of planning documentation otherwise they would quickly fall into disrespect and become meaningless.

We propose to replace these plans with new duties or powers for local authorities to work together on defining regional priorities. **Views on what needs to be done at this scale** are invited, but we suggest that the following actions would be beneficial:

- Helping to develop a strategy and delivery programme to be adopted as part of the National Planning Framework (NPF). We would want to see regional partnerships working with the Scottish Government, agencies and local authorities to make sure

there is evidence to support the National Planning Framework (NPF) and then to implement their regional commitments through the delivery programme.

“Helping” and “working with...” are the terms used, but this doesn’t fully describe the role of the regional partnerships in setting the regional priorities within the NPF. Nor does it describe how the regional priorities should be expressed. Regional partnership working with Scottish Government is supported and indeed can be seen through Nestrans working with Transport Scotland on various issues across the modes and through the Aberdeen City Region Deal.

- Co-ordinating the work of local authorities to support the aspirations for housing delivery, as set out in the National Planning Framework (NPF).
- Bringing together infrastructure investment programmes to promote an infrastructure first approach, provide a co-ordinated audit of economic and social regional infrastructure, identify the need for strategic investment and support necessary cross-boundary working.

Transport is a part of the infrastructure required to develop land for housing. The integration of how transport is to be developed as part of a wider infrastructure development is not clear. Previous comments about funding for infrastructure apply.

- Co-ordinating funding of infrastructure projects, potentially including an infrastructure levy, and working with others, in both the public and private sectors, to develop regional funding and finance packages that support their strategies for growth.
- Acting as a ‘bridge’ between local and national levels by making sure that local development plans support the delivery of wider strategic priorities. Partnerships involving business representatives as well as the public sector could provide a forum where regionally significant matters and common goals can be discussed and used to inform local strategies and development planning.

Nestrans in effect provides these functions for transport in the north east, incorporating business and community representatives, but doesn’t do so for wider infrastructure requirements. Making sure that Local Development Plans support the delivery of wider strategic priorities is a function of Nestrans in so far as transport is concerned and works well given the statutory nature of the Regional Transport Strategy. Options could include:

- Extending the role of the Regional Transport Partnerships to regional infrastructure partnerships;
- Extending the remit of the existing Strategic Development Planning Authorities (this would require consideration of areas of the country not covered by a strategic development planning authority);
- Combining the Strategic Development Planning Authorities and Regional Transport Partnerships into a regional partnership (again this would require consideration of areas of the country not covered by a Strategic Development Planning Authority);
- Joint Council working.

Previous comments in the main body of this response apply in these considerations. Comments in relation to the status of the outputs from any of these options also apply.

We would **welcome views** on the above actions. We believe they could form the basis of new duties to help planning authorities to be actively involved in regional partnership working. We are also open to considering making these actions discretionary powers which

allow local authorities to decide whether this level of co-ordination would be of value. We **would welcome views** on working arrangements and governance. We are keen to avoid creating new partnerships where tasks can be achieved through existing arrangements.

The main body of this response discusses the governance issues.

## Regional geography

The way in which local authorities and their partners are currently working together at a regional scale is dynamic, and this is relevant to the future of strategic spatial planning in Scotland.

It is agreed that developing City Region Deals and the geographical and economic differences across the country could lead to differing solutions for differing parts of the country.

Aberdeen City and Shire have a long tradition of co-operation to provide a North East perspective on growth and development and their city deal supports taking this forward with strong private sector representation.

The contribution of the non-Councillor Members, representing business and community interests, to the work of the Regional Transport Partnerships has been well received and valued by the partnerships. The contribution of the business community to development of agreed regional approaches to economic and transport strategy has also been well received.

Regional land use partnerships, to help deliver the aims of the Land Use Strategy, will be explored further. .... enterprise and skills review .... regional geography of economic development and includes proposals that combine stronger national oversight with additional regional coverage .... developing regional partnerships across Scotland. This could also connect with emerging work on the development of a Scottish Rural Infrastructure Plan.

Thoughts along the lines of including the strategic element of economic development within any regional partnership working are supported and are in alignment with the north east's response to the enterprise and skills review.

All of these arrangements are potentially relevant to the future of strategic planning. We need planning to respond to changing regional priorities and groups, rather than focusing on fixed boundaries. We propose that existing strategic development planning authorities form part of, or are replaced with, partnerships whose membership extends beyond planning to include all those with a role in planning, prioritising and delivering regional economic development and investment in infrastructure.

We **would welcome views** on the following options for the scale and coverage of regional partnership working:

- Rather than defining or fixing the boundaries of partnerships which may or may not reflect changing regional partnerships that emerge over time, local authorities could define the geography of their involvement in regional partnerships locally. This would allow, for example, strategic planning to better align with emerging city and growth deals.
- We could link strategic planning with the ongoing Enterprise and Skills Review and its proposals for regional working covering the Highlands and Islands, South of Scotland and regional partnership network.

- We could use the National Planning Framework (NPF) to identify priority areas where future regional partnership working should take place.

Regional planning, incorporating economic development, spatial planning and transport, should take place and it should have meaning and purpose. Planning at this level should also consider wider infrastructure requirements. Options for consideration on how to achieve this have been noted above.

### Proposal 3: Improving national spatial planning and policy

We want to build on the growing awareness of NPF, and support our proposals for stronger co-ordination of regional planning by producing a spatial strategy that is prepared following even more joint working and involvement.

Whilst it is agreed that national priorities should be reflected in the regional priorities, following a previous comment on “helping” and “working with” it is not clear what “even more joint working” means with regard to how regional priorities are represented in the NPF. That is, whose regional priorities are they as they appear in the NPF – the Scottish Ministers or regional partnerships? Previous comments regarding the regional partnership working being a true collaboration at the regional level apply.

An enhanced national spatial strategy which provides greater clarity on regional priorities (informed by the work of regional partnerships) would have greater significance and relevance across Government policy areas.

What does “informed by...” mean? Comments regarding the nature of the regional priorities document or documents apply.

Extending the review cycle to 10 years (with a 30-year vision), whilst making provision for interim updates to be made where necessary.

Whilst this is in relation to the Local Development Plans, consideration needs to be given to how this would impact on any future Regional Transport Strategy should there still be a requirement for one or any regional priorities document. In a fast moving and changing society, 10 years seems a long time.

A delivery programme for the National Planning Framework (NPF) should be developed in close collaboration with regional partnerships and there should be a strong sense of shared ownership of the actions it contains.

This seems a laudable aim to start from. Presumably this would be dependent upon how much of the regional partnership’s priorities made it into the NPF. Consideration will have to be given to national view versus regional view plus national and regional affordability and how this would be represented in the new system.

### Proposal 4: Stronger local development plans

#### Examinations

Amongst other things proposals for Examination of the new Local Development Plans would include:

- That there has been an audit of existing infrastructure levels and necessary interventions have been prioritised, including the plan's transport appraisal and other types of infrastructure

Does the “plan’s transport appraisal” mean the DPMTAG appraisal, the Regional Transport Strategy or does this mean that in effect the Regional Transport Strategy is superseded by a transport appraisal as a part of the Local Development Plan – LDP’s are not regional in scale but presumably transport is still to be considered at the regional level? This assumes of course that the Local Development Plans are still at Local Authority level, not regional partnership level. Or does “plan’s transport appraisal” mean the Local Transport Strategy and if so is this aligned to a ten year review timescale?

### Building more homes and delivering infrastructure.

More must be done to support the delivery of the homes that people need, now and in the future. This is a high priority.

Infrastructure has a critical role to play in supporting housing delivery.

In the north east where for the past near fifty years, there has been strong and consistent growth in the jobs and housing markets, the private sector investment in those areas has outstripped the public sector’s ability to serve that growth. Currently and within the next few years there are considerable investments being made to close that private sector/ public sector gap and we are catching up. However, it would be generally agreed, and reflected in a City Region Deal bid of c£3billion, there is still a considerable amount of work to be done to accommodate the expected further growth in the region. Amending the Planning system and putting a focus on “infrastructure first” may help in this regard but ultimately investment is required.

### Proposal 10: Being clear about how much housing land is required

#### National aspirations for housing development

National or regional targets within the National Planning Framework (NPF) could provide some clarity, but would have little practical effect if it is not consistent with local and developer priorities and commitments to investment.

National Planning Framework (NPF) should be clear on our national and regional aspirations for housing delivery

The comment immediately above applies particularly when considering the cumulative impacts of development on the strategic infrastructure. These cumulative affects, particularly in a fast growing region, add up very quickly to a significant investment need beyond developments ability to pay. The system, at national and regional level, should recognise past and future growth and the implications for this growth. Infrastructure provision at national and regional level should take account of this past and predicted growth. Developer priorities are important as are national infrastructure priorities. Efforts to try to align these through the system are supported.

It is clear that housing supply targets should be agreed at national and regional level.

### Proposal 13: Embedding an infrastructure first approach

We agree with the independent panel that infrastructure is the most significant challenge for planning at this time.

An infrastructure first approach to development should ensure that existing infrastructure capacity is properly understood, can help to identify where additional investment should be prioritised to enable future development, and can be achieved where delivery is co-ordinated.

This statement may well be true particularly in areas where there is a significant cumulative impact. It does though miss the point above regarding cost of infrastructure in fast growing regions.

#### National level co-ordination

An enhanced National Planning Framework (NPF), which informs and is informed by, the Infrastructure Investment Plan, could play a key role in helping to prioritise future infrastructure spend.

we propose establishing a national infrastructure and development delivery group, comprising appropriate representation from the Scottish Government and its agencies, public and private sector infrastructure providers and the Scottish Futures Trust. The group would:

Does this include the regional partnerships?

- In the first instance, contribute to developing more detailed proposals for an infrastructure levy.
- Consider how developer contributions could work with wider funding and finance solutions, including city deals, to secure investment that fully supports regional priorities for growth.
- The group could oversee and consider regional infrastructure audits, prepared by regional partnerships.

What status would these audits have? Would they include missing pieces of infrastructure? Would they then become the regional partnership's priorities for infrastructure. If agreed by the group would they then be accepted into the NPF?

Regional and national transport strategies already perform part of this function for transport.

Careful consideration is required to ensure that the regional partnerships are seen by the Local Authorities as a true regional collaboration in their region rather than a partnership working for a national body.

Proposals for an infrastructure levy are supported as this follows the north east's attempt to create such a levy for transport.

#### Regional partnerships

Stronger co-ordination in infrastructure planning and investment at a regional scale is particularly relevant to planning and delivering development. We agree with the independent panel that co-ordination should be significantly improved at this level. As set out in section 1, our proposals aim to ensure that planning is better placed to respond to the partnerships at the regional level that are already, and will continue to, emerge and develop.

Our proposals to replace strategic development plans with regional partnership working would empower planners to advise on spatial priorities for infrastructure investment. At this scale, the infrastructure first approach would be supported where partnerships provide fuller and more reliable evidence for strategic decisions about investment. This could be achieved by a regional audit of infrastructure capacity which brings together, for example transport, schools, healthcare facilities, water, flooding, drainage, sewerage, energy, telecommunications, digital and green networks. The Strategic Transport Projects Review, carried out by Transport Scotland, should also work alongside spatial planning to form an essential part of strategic investment planning at both the regional and national scale.

In the north east, there are already attempts to achieve this through the Strategic Development Plan. It has a Future Infrastructure Requirements (FIRs) Group which meets to determine the region's infrastructure needs. Within transport there is the Regional Transport Strategy to inform the FIRs needs. It is therefore unclear how replacing Strategic Development Plans would "empower" planners to advise on spatial priorities for infrastructure investment.

That doesn't mean that things can't be done better. Nestrans, along with our Councils and SDPA are already working with Transport Scotland, through the City Region Deal, to provide a transport appraisal to advise the national Strategic Transport Projects Review and the next Regional Transport Strategy.

#### Proposal 14: Creating a fairer and more transparent approach to funding infrastructure

##### Infrastructure levy

Improvements to practice in Section 75 obligations will not fully close a gap in infrastructure funding which has emerged following the 2008 recession and the steep decline of housing delivery that arose at that time. In addition, it will not tackle challenges in securing collective contributions for strategic infrastructure. Following the recommendations of the independent panel, we commissioned research into a new development charging mechanism for Scotland. This could help to deliver strategic infrastructure that is needed to support development across a wider area and would help to build a more confident, infrastructure first approach to planning and development.

Nestrans agrees that securing collective contributions for strategic infrastructure would help. However experience in the north east of the Strategic Transport Fund would suggest that "help" rather than "resolve" is correct. Further investment by the public sector is likely to be required.

We propose that the Planning Bill includes an enabling power to introduce a new infrastructure levy for Scotland.

The fund will not replace site specific contributions which are needed to mitigate the impacts of individual developments not covered by the levy and secured through Section 75 planning obligations or other methods.

Similar to the north east's Strategic Transport Fund.

#### Proposal 15: Innovative infrastructure planning

Land use and transport planning should be integrated to ensure that their impact on connectedness, accessibility, and 'active travel' (walking and cycling) are brought together and used to improve quality of place. Transport Scotland has begun a review of the National Transport Strategy which will inform the next Strategic Transport Projects Review and will

consider transport governance, including the role of regional transport partnerships, as part of this. This should reflect the proposals for change set out here.

It is agreed that land use and transport planning (and also the strategic elements of economic development) should be integrated to improve quality of place.

It is noted that the National Transport Strategy review's consideration of transport governance is currently scheduled for completion towards the end of summer 2018. Developments of the planning system as proposed following this consultation should be taken forward in conjunction with the consideration of transport governance through the National Transport Strategy.