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By E-Mail

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Comments by the Scottish Property Federation on the SESplan Main Issues Report Early Awareness

Introduction

1. The Scottish Property Federation (SPF) is a voice for the property industry in Scotland. We include among our members; property investors, developers, landlords of commercial and residential property, and professional property consultants and advisers.
2. We welcome the opportunity to contribute to the Main Issues Report Early Awareness for SESplan. As you are aware SPF had difficulties in accessing the on-line survey. As agreed we have prepared a word response to allow you to add into the system. These comments are in the order of the survey on the questions raised in the consultation.

Question 1

The Vision for South East Scotland as set out in Strategic Development Plan (SDP)1 is that 'By 2032, the Edinburgh City Region is a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business.'

3. Our members are of the view that the Vision in the SDP2 needs updating but focussing on the same principles. The main concern for SPF in SESPlan 2 will be to ensure viable employment and investment opportunities are secured for the region. Edinburgh is performing relatively strongly at the moment with significant commercial investments on-going at Haymarket, New Waverley, Quartermile and the recently announced St James Quarter redevelopment. Edinburgh Park has also seen some recent investment and the Shawfair development is also again underway. It will be important to build on this success more broadly across the region.
4. Our members are also of the view that the provision of sufficient housing is crucial to a healthy prosperous and sustainable city region. This can be achieved through the allocation of a sufficient effective supply of marketable housing land in locations where people want to live and consequently developers want to build. There is real concern that the approach taken in SDP1 which was based on a strategy of not meeting housing need and demand will be repeated in SDP2.

Question 1b – Healthier Lives

What can SDP2 do to enable people in the SESplan area to live healthier lives and to create a better quality of place?

5. Our members would like to see buildings with flexible, viable and cost effective designs that can be adapted to suit changing aspirations and fluid markets in the current economic environment. Place making is supported around a good infrastructure (particularly transport) with access to a mixture of property uses including retail outlets, employment, leisure and ideally residential uses. They are of the view that this is important for both commercial and residential development with similar aspirations applying to both. The key will be to associate transport and development correctly. Mixed development of residential and commercial centres can also help (thus minimising private transport use).
6. Healthy lives rely on the provision of sufficient housing for all. To ensure the area's housing land requirements are met SDP2 can direct housing towards marketable locations where people want to live and developers want to build. If housing land, which meets these criteria, is not allocated, there will be a shortfall in effective housing land supply and the housing land requirement will not be addressed.
7. As outlined above the single greatest problem in today's housing market is lack of supply. The Private Rented Sector (PRS) could make a significant difference to the number of new homes provided in Scotland. The multiplier effect of new investment would bring enormous economic benefits and should, be actively encouraged and incentivised. As the growing PRS sector matures and investors are attracted to a stable and sustainable sector there may be benefit in considering PRS as a distinct planning use. In the short-term however, in order to attract investment and confidence in the sector, some flexibility will be necessary.

Question 2 – The SESplan Spatial Strategy

Question 2a – Strategic Development Areas

SDP1 identified 13 area for strategic growth. Should SDP2 continue to focus on these 13 Strategic Development Areas?

8. Our members are of the view that while it is appropriate for SDP2 to continue to direct growth towards identified SDAs it is also appropriate to direct development to sustainable locations out with the SDAs. SDP1 contains a sequential approach which indicates that preference should be given to the allocation of housing sites in SDAs compared to non-SDAs. Our members have concerns that in some cases non-SDA locations may be preferable in regard to sustainability. Sustainable development relies on identifying locations where people want to live and do business.

Question 2b – Strategic Development Area Principles

SDP1 directs Local Development Plans (LDPs) to set out the details for development within Strategic Development Areas including phasing and the mix of uses.

Should SDP2 provide more detail on the key principles for development within identified Strategic Development Areas?

9. **No** – Our members are firmly of the view that it is appropriate for key principles to be addressed by Local Development Plans. The purpose of the Strategic Development Plan is to address “land issues that cross local authority boundaries or involve strategic infrastructure”.

Question 2c – The transition to a low carbon economy

The Scottish Government have set ambitious targets for a Low Carbon Scotland with a reduction in emissions of 42% by 2020.

What are the best ways in which SESplan can contribute to the Scottish Governments target for a low carbon Scotland?

10. The SPF supports the Scottish Government’s 2020 emissions target through the implementation of national Building Regulations. Our concern is to ensure that these Regulations are feasible and commercially achievable. In relation to the wider context of reducing carbon emissions most major commercial developments as referred to in paragraph 3 are city centre or close to forthcoming transport infrastructure. In this sense the commercial market, based on corporate occupier demand, is largely centred on existing infrastructure or enhanced transport infrastructure.
11. Our members are of the view that it is not appropriate for the Development Plan framework to prescribe stringent design criteria. SDP2 could support residential development in sustainable locations and in particular those located within close proximity to railway stations.
12. Our members are also of the view that attracting larger scale investment should take account of new build development for rental purposes where appropriate. This would introduce a scale of quality and choice that would support wider objectives such as additional supply and more energy efficiency housing. Larger scale landlords would also have costs to consider but generally may be in a better position to effect energy efficiency improvements and invest in property condition, than those who operate on a smaller scale.

Question 2d – Climate Change

What can SDP2 do to help the SESplan area adapt to climate change?

13. See 2c above.

Question 3 – A Place for Communities

Question 3a – Affordable Housing

SDP1 guides LDPs to take an appropriate approach to affordable housing in compliance with Scottish Planning Policy. However, SDP1 does not contain a specific policy on affordable housing.

Should this be the case for SDP2?

14. No

Question 5 – A Better Connected Place

Question 5a – Transport and Infrastructure

What do you think are the major challenges relating to transport and infrastructure in the SESplan area? Please list no more than 3.

15. The availability and deliverability of all infrastructure to enable sustainable patterns of settlement growth requires to be considered in the preparation of a City Region wide development strategy. Essential infrastructure considerations include, for example roads, education, drainage, broadband and availability of community facilities. In addition, access to amenities and leisure facilities will also be important considerations for both employers and households alike.

16. Across the SDP area, local authorities adopt different approaches to securing infrastructure associated with settlement growth and in particular housing development. The early stage preparation of SDP2 provides the opportunity to put in place a framework of guidance which sets out requirements and delivery mechanisms across the constituent local authorities. A consistent approach should provide developers with increased certainty, speeding up delivery of development and supporting infrastructure. However, costs and viability will remain key issues and will need to be carefully considered in a situation of continued financial risk aversion. SPF will be pleased to contribute to the consideration of any proposals for such mechanisms.

What do you think are the infrastructure types or specific projects that require priority infrastructure investment in the SESplan area?

17. For housing developers, each site has a different set of requirements, for example transportation and education infrastructure are obviously key.

Question 5b – Transport Improvements

SDP1 sets out a number of strategic transport improvements to be delivered. Thinking about the four groupings below and the SESplan vision, which do you feel are the 2 most important to invest over the next 25 years in the SESplan region. Please pick 2 of the following.

18. There are no 2 priorities for strategic transport improvement. SPP2 (para 38) directs decisions on the location of new development to, “reduce the need to travel and priorities sustainable travel and transport opportunities.”

Question 5d – Green Space Improvements

National priorities for environment and green space improvements in Central Scotland are focused on improving derelict land, improvements in deprived areas and creating cycling and walking paths and routes.

Which do you feel is the most important?

19. Our members are of the view that improving deprived areas is one important factor and have noted that the priorities omit the contribution that new greenspace associated with new residential development plays in improving the environment. SDP2 offers the potential to identify to promote its role.

Question 6 – Have we missed anything?

20. One result of the relative lack of demand for older town centre offices will be that a number of private investors and commercial property owners will be reconsidering their use of older buildings that may previously have been converted into offices and possibly now in need of reconversion. The Scottish Government recently supported this policy with some £2mn of funding. It is likely that further funding support may be required to deliver substantive numbers of conversions. In addition to funding there will be a requirement to review certain existing planning policies, such as restrictions upon residential parking. But in the main conversion will offer a route for the re-use of properties that will struggle in many cases to become re-usable for commercial uses.

Question 6a – Anything else?

Briefly, are there any other strategic issues which SDP2 should address?

21. SDP1 is a short concise document which sets out the strategic framework for land use and development in an accessible manner. SDP2 should continue with this focused approach.

22. SESplan provided a good deal of opportunity for stakeholders to make representation to SDP1, however it is unfortunate that no changes were made to the proposed Plan despite the compelling comments made on housing supply and demand. The result of this is significant delays in the preparation of LDPs within the SESplan area, further frustrating the allocation of sufficient effective housing land and delaying investment decisions.

23. The SPF would be pleased to answer any queries regarding our comments.

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