

Land Use Strategy Team
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[Sent by Email]

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Contact: David Jennings
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Our ref: FP/Leg/Sec/Consult

Your ref:

Date: 3 December 2010

Dear Sir / Madam,

A draft land use strategy for Scotland: Consultation response

Thank you for the opportunity to comment on the above consultation document.

The Aberdeen City and Shire SDPA was established under the Planning etc (Scotland) Act 2006 primarily to prepare and keep under review a strategic development plan for the North East of Scotland.

As a consequence of the remit of the SDPA, this response concentrates on the relationship of the land use strategy to the planning system.

The production of the draft land use strategy is a welcome development in seeking to take a holistic view of land use and set it within the context of climate change and the need to move towards a low carbon economy. Also welcome is the discussion provided by the draft strategy itself, enabling a wide range of sometimes conflicting land use issues to be addressed. As such, it can be seen alongside the work of the Scottish Government on National Planning Framework 2 and through Marine Scotland to prepare a Scottish National Marine Plan.

Given these relationships, however, it is vital that these documents are complementary and that their respective roles are clear. In this context it is considered that this issue needs to be addressed more comprehensively and at the very start of the document rather than at section 2.6. This is important because at a number of stages throughout the strategy, reference is made to the strategy informing future planning policy (the inference being at both national and local level) and being taken into account in local authority decision-making.

One potential solution to this challenge in the context of future iterations of the strategy would be to:

- ensure a clearer dividing line between policy material; or
- to combine the land use strategy and the national planning framework into one

document. On the face of it such an approach would appear to be consistent with the respective legislation, although it would require a more rigid timeframe for the review of the national planning framework.

Combining the national planning framework and the land use strategy would provide enhanced clarity and consistency as well as a more rounded picture of future land use in Scotland being presented.

An example of potential duplication is that, while section 3.2.4 rightly recognises the importance of protecting prime agricultural land in the context of food security, this needs to be set into a broader context which is set out in Scottish Planning Policy – ensuring that food security is not the only consideration when considering the development of such land.

One of the clear challenges for the strategy is the lack of clearly identifiable implementation mechanisms which are in the hands of the Scottish Government. This should be recognised up-front because it will impact considerably on the ability to meet the objectives.

Equally critical, however, will be ensuring that regulation, incentives and other policies are all aligned with the desired strategic direction and not considered in isolation. If the land use strategy achieves this objective it will have made a valuable contribution towards sustainable land use in Scotland.

I have enclosed a completed respondent information form to accompany this response.

Yours sincerely,

David Jennings
Strategic Development Plan Manager