

OBJECTION OF NORTH KINCARDINE RURAL COMMUNITY COUNCIL TO THE ABERDEEN CITY AND SHIRE FINALISED STRUCTURE PLAN

4. PUBLIC TRANSPORT INCLUDING RAIL AND CROSSRAIL

Page 7 – Vision and Aims - the two main aims are declared as being economic growth and responding to "*the urgent challenges of sustainable development and climate change*". The aim relating to ... "*making the most efficient use of the transport network..*" and... "*making sure that.....public transport (etc)...are attractive choices..*" is, by contrast, relegated to the last item on the list. This may seem insignificant, insofar as it is nevertheless an aim, but, when reading the remainder of the plan it can be seen as symptomatic of what we believe to be a very important defect of the plan, i.e. the failure to emphasise the vital necessity to develop and improve the public transport infrastructure, including rail and Crossrail.

First, there is no evidence provided in the plan or supporting documents for placing such a priority on responding to climate change. Second, the absence of a coherent transport strategy is widely seen as being a significant factor limiting the economy of the Aberdeen City Region, and the housing and business development envisaged in the plan (even if not on the scale predicted by the plan) will bring that into even sharper focus.

The delays in returning Laurencekirk station to service and the dearth of significant improvements to public transport infrastructure in association with the new development at Portlethen, do not inspire confidence (though we acknowledge that the responsibility lies with the local authority in only one case). It is simply that they show that, regionally, lip service is being paid to the notion of reducing private car use and improving public transport, but it is not being aggressively pursued.

If the plan can predicate the growth of whole communities, major economic development, retail expansion etc, how can it fail to give greater emphasis to this most important subject? The concept of focussed development in the road and rail corridor, Laurencekirk – Huntly, is accepted, but the concomitant need for early and urgent development in public transport is largely overlooked.

We see it as vital that this plan gives the correct emphasis to improvement and expansion of the public transport network. It is not good enough for the SDPA to claim, as they have done in response to previous objections, that it is the job of NESTRANS to deal with these things.

This plan proposes placing a very large number of houses and people in a transport corridor, but then fails to propose sufficiently radical action to enable the people concerned to be carried in an environmentally sustainable manner. More action needs to be specified to address transportation issues.

The lead, and the statement of the importance of improving public transport – especially rail links – must come through this Structure Plan, (with a specific objective in Section 4 for such improvements) especially since it will inform the subsequent Local Development Plans.

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1. USE OF LOW / PROBABLE / HIGH CASE SCENARIOS

The Plan itself provides no details of the criteria on which the different scenarios are based. However, the **Strategic Forecasts 2006 – 2031, (Pages 8 – 11)**, published in Sept 2007, show the following. The assumptions include:

PROBABLE SCENARIO

- *High oil prices will remain.....*
- *Leading energy companies will maintain their commitment to the area, and new entrants will see the UK Continental Shelf (UKCS) as a good investment opportunity.*
- *Aberdeen will strengthen its position as a global centre of excellence in the energy sector.. potential to increase its exports....*
- *Aberdeen .. has a developing renewables sector.. expected to continue to grow at its present rate.*
- *..farming and fishing, .. more positive in 2006; no major decline is anticipated, and diversification into other areas is likely..*
- *The rate of growth in the number of overseas migrants coming to Aberdeen... is expected to level off.*

While the above assumptions may appear optimistic they may be reasonable given other current economic indicators. On the other hand the assumptions used for the High case are very questionable and it is alarming that they have been used as the basis of the Structure Plan and the population estimates and housing forecasts it contains. They include:

HIGH CASE SCENARIO

- *A higher level of activity in the energy sector with increased investment.... west of Shetland.*
- *An expansion in onshore developments; .. an increase in the rate at which corporate / regional headquarters are relocated to the.... area*
- *Significant adjustments to the UK tax regime making the UKCS a more attractive investment opportunity....*
- *A surge in the renewables sector, with major projects and high employment levels in Aberdeen City and Shire.*

- *Higher than anticipated activity.. in non-energy sectors,.. arising from spin-off opportunities created by increased investment in the UKCS.*
- *Expansion of Aberdeen Airport.. greater than expected economic benefits from the AWPR and other major infrastructure projects*
- *.. increasing demand for locally grown.. produce resulting in higher employment.. and.. increase in agricultural land use; relaxed quota and TAC restrictions on the local fishing fleet.*
- *... Peterhead, Fraserburgh and Aberdeen becoming centres for fish processing and packing factories as a result of higher fish landings.*
- *.. recent influx in overseas migrants, particularly from EU..continues at its present pace*

Whilst severally these may form a list of very desirable events in the area which we would all welcome, to believe that every one of these desirable events will transpire is to stretch credulity. In short, we believe that jointly they are overly optimistic, simply not realistic and should not be used as the basis for economic growth forecasts.

To take only a few examples :

The recent Public Inquiry produced no evidence whatever that the AWPR would produce significant economic benefits for the region, let alone...*"greater than expected ones.."*.

"Farming and fishing sectors have suffered in recent years, but 2006 saw a levelling-off in both.." (**Strategic Forecasts, Page 6**) That is a long way from *"higher fish landings..",.....and....."increasing demand resulting in higher employment.."* as quoted in the High Case scenario Further, the possibility of ...*"relaxed quota and TAC restrictions on the local fishing fleet.."* seems an unlikely prospect.

".....recent influx in overseas migrants, particularly from EU... continues at its present pace.." The Strategic Forecasts were published in Sept 2007. Both anecdotal and statistical evidence shows that it has not continued and that it is gradually being reversed.

"Significant adjustments to the UK tax regime.." - in favour of oil exploration under this or any future government appear unlikely.

The effect of adopting all of this as a basis for projections in the plan is, in our opinion, to distort the plan and probably to invalidate its conclusions. This rose-tinted vision of future economic growth leads to the highly speculative population increase, based on little more than wishful thinking, which in turn is one of the major drivers of the similarly speculative and over-ambitious housing figures.

We can do no better than to quote – again - the SDPAs own caveat in **Para 4.19** :

*....."Meeting these targets will also depend on factors **which are not related to the development plan or under the control of the planning authorities** (our emphasis). These factors include the health of the global and local economy, the price of oil, Bank of England base rates, the response of the house-building industry and how the area is marketed.."*

Finally, and rather worryingly, an examination of the Low Case scenario in the Strategic Forecasts, reinforces all our above-noted concerns. It includes these possible events :

LOW CASE SCENARIO

"Turmoil on the financial markets and recession in the major world economies causing the oil price to fall sharply with a consequent reduction in investment in the UKCS."

"Other oil and gas provinces perceived as more competitive than the UKCS resulting in companies relocating away from Aberdeen City and Shire."

"The ageing infrastructure in the North Sea is no longer capable of sustaining the oil and gas industry beyond the short term."

"No major employment opportunities coming from the renewables sector."

"...more quota and TAC restrictions in the North Sea..."

The first is with us. The second and third are based on current fact and may well develop. The fourth is very possible as major parts of renewables manufacturing are already based abroad and the last – based on recent history – also appears very likely.

We understand that the plan covers a 25-year period and that temporary conditions must not be given undue weight and allowed to distort the broad long-term vision. However, whilst targets are an essential part of the Plan process, they must be realistic and achievable.

Regrettably, the uncomfortable possibilities quoted from the Low Case Scenario give added force to the reservations we have already expressed and lead us to ask that this Plan be subject to public scrutiny through an independent Public Local Inquiry (or Examination in Public).

To be optimistic is admirable but the vague, over-ambitious vision and unjustified assumptions herein enshrined go beyond boldness and verge on the reckless, with potentially serious consequences.

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2. POPULATION GROWTH

Pages 17 and 18. Frankly, we do not see how Population Growth can ever be a policy objective of a local authority. It may be desirable and it may follow if economic growth ensues, as commerce and industry develop and need more people, but to state as an objective something entirely outside the LA's control is unrealistic.

The unrealistic nature of the intention is openly admitted in **Para 4. 19**, which states:

"...Meeting these targets will also depend on factors which are not related to the development plan or under the control of the planning authorities.."

Para 4.11 - makes the bald assertion that... *"a falling population has a negative effect on investors confidence, the ability of the public and private sectors to provide services and facilities and residents' quality of life."* We see no evidence in the plan or supporting documents to support this statement and, frankly, the opposite view could be taken (and, by many people, is), particularly with regard to 'quality of life'.

Para 4.12 - contains the statement that... *"we need the population to grow to allow the economy of the area to fulfil its potential"*. Population growth may well be a consequence of economic growth based on increased employment needs, but even this is questionable for this region. North Sea oil and gas dominates the region's economy and will continue to be important as the plan acknowledges (**Para 4.1**) with some estimates predicting 40 years further production. Production has peaked and activity has levelled off, but even if that plateau is maintained and there is no decline, it seems clear that developments during the Plan period will continue to be more capital-intensive and less labour-intensive. In other words the region's principal economic strength will depend increasingly on technology and less on numbers of people. The purpose of the plan should therefore to be to allow the infrastructure to respond to changes in population rather than engineer changes which may or may not be required to support the local economy at some point in the future. Merely to provide 'numbers' – even if that were possible and within the control of the local authority – would not supply the people and skills needed, whether for oil and gas industry or other employers.

Para 4.13 and Figure 7 - is based on the recently revised GRO(S) datum figures and is given in detail in the Strategic Forecast. It is significantly different from the 2004 – 2005 local authority figures and is in contrast to the NPF2 data of Jan 2008, which forecast an 18% fall for Aberdeen and a 5% increase for the Shire. The revision uses a new model, extrapolating very recent population growth **mainly based on higher rates of inward international migration** (produced by GRO(S); **Para 2.4 of**

Background Paper), over the full period of the Plan, which appears to be a dangerously optimistic assumption. Dangerous, because such extrapolation is over 25 years ; dangerous on account of the known levelling-off of such immigration, and also because the consequent population figure is one of the drivers of the housing requirement, which we also believe to be too high.

Even the updated GRO(S) forecast produces a "Probable" estimate of future population for the area which is around 25,000 lower than that shown in **Fig 7**. If the "Probable" case is used, population in the area overall is forecast to increase by less than 14,000 (3.1%) as opposed to the nearly 40,000 that is used in the Plan.

Para 4.11 and Targets (P 18), Bullet point 2 - Para 4.11 admits that the number of people of working age (16-65) is likely to fall (... *"if, as predicted.."*) and refers tangentially to .. *" an increasingly elderly population.."* The Target, however, is to increase those of ... *"working age (16-65) by 15% by 2030.."* The Target may represent an ideal position, but bears no relation to the known demographic trends throughout the UK – and indeed much of the Western world. We face an aging population, that trend will accelerate and whilst the City and Shire may view it as desirable to increase the proportion of 16-65s, it will find itself in competition with every other town, conurbation and region not only throughout Scotland but the UK. We therefore see this target as unrealistic, as is tacitly acknowledged in Para 4.11.

We therefore suggest that the numerical targets included in this section are reassessed to reflect more accurately the Councils' own population forecasts and that the Plan overall is amended to reflect these more realistic expectations.

As previously stated, the speculative nature of the figures is highlighted when Para 4.19 admits that

"Meeting these targets will also depend on factors which are not related to the development plan or under the control of the planning authorities...."

Strangely, however, it then goes on to say that.....

..... "how the area is marketed to potential residents from the rest of Scotland or further afield.."

is one of those factors.

Given the very optimistic assumption of continued levels of high inward migration it is surprising that the future marketing of the area is not seen as the responsibility of the local authorities and that there is nothing in the Plan to indicate how such inward migration will be achieved.

This is surely an error: who, or what institution, will market the area (in competition with every other area of Scotland), if not the local authorities?

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3. HOUSING REQUIREMENT

Para 4.15 – 4.17 and Figure 7 - The suggestion set out therein for the numbers of houses needed during the Plan period, and which stem in part from the economic growth and Population Growth forecasts discussed elsewhere in this objection, is the most controversial aspect of the Plan. We believe that both forecasts are founded on flawed assumptions, are unrealistic and therefore produce a housing forecast that is itself flawed and is too high in that it overstates the **maximum numbers** needed and then further increases them by a ridiculously inflated 'flexibility factor (see below). The whole is based on a somewhat Utopian view of the economy and the extrapolation of the most optimistic population figures stemming from a questionably revised base.

The target of 72,000 homes, evenly split between the City and Shire (and with 21,000 on greenfield sites within the City) is alarmingly high. Alarming in the sense that, in seeking to provide the maximum possible number needed, it may help destroy the very qualities that the Plan seeks to promote... 'unique qualities of our environment....high quality of life..' etc. Alarming insofar as 21,000 houses on greenfield sites in the city – which will be principally Green Belt - will tend to reinforce the movement of people from the city to the Shire which the Plan is plainly trying to counter. Alarming in the sense that if, as we believe, the target is far too high, and with development in the Plan period being 'front-loaded', there will be no chance to backtrack and revise the forecasts to a more realistic level. Alarming too, in respect of major housing developments being left unfinished if growth is not as forecast.

Predictions of the increase in the number of households to 2031 vary. GROS and the two councils broadly predict the same – 38,000 - (except that the councils' forecasts show 43% of those in the city, while GROS shows 13%, an obvious attempt on the part of the councils to reverse the drift from City to Shire). Even using the High migration figures, GROS and the two councils still only forecast around 50,000, (GROS : 30% in the City, the councils 45% in the city). On either basis, therefore, the Plan figure of 72,000 (**Page 27, Schedule 1**), is 40% above even the most ambitious forecast of what will be needed.

The manner in which the overall housing figures have increased so dramatically is shown in the following figures (all shown as 2006 to 2031 figures for easy comparison):

Previous forecast 31,825 (from p.a. figure of 1273. **Page 42 of Strat. Forecasts**)

Current forecast 47,100 (**Fig 35/36 of Strat. Forecasts** – Probable scenario)

Revised forecast 59,100 (**Fig 37 of Strat. Forecasts** – High Case scenario)

Thus the revised figure is an 85% INCREASE on the original figure. A further illustration of the dangerously high numbers is that when the final figure is decided for the Plan period and quoted in the Plan it is 56,300 (**Page 17, Fig 8**), but, in order to... "*accommodate flexibility..*" (**Note to Fig 36 of Strat. Forecasts**) it is increased to 72,000, a 'flexibility factor' of 28% !!

We believe that the Plan should use the Probable forecasts in projecting increases in numbers of households, and that the housing requirement should therefore be in the range of 40,000 – 50,000 at the most.

Whichever number is used, there should be a proportion held in reserve, identified and ready to be brought forward if needed, to overcome the dangers inherent in going too far too fast with housing numbers. If Phase 1 is completed early, then Phase 2 can be brought forward.

Schedule 1 - A final criticism of the housing figures in this Plan is that, despite the current economic climate, the 'front-loading' of the housing requirement has remained unaltered.

Whilst we are aware that the plan covers a 25-year period, and that the current economic difficulties cannot last that long, it is not acceptable to brush them off – as the Plan team has – as merely a short-term 'blip' which must not interfere with a strategic vision.

We are already two years into the 2007 – 2016 period, in which 38% of the total housing is intended to be built (46% in the City). Some recognition has to be given to the slowdown – indeed near halt - in the construction industry, a slowdown which according to many well-respected commentators, could last for up to two years

A re-scheduling of a reduced total figure is needed, plus the holding in reserve of a proportion of the total - as referred to above.

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5. GREEN BELT REVIEW

Page 19 Para 4.23 This states that the Green Belt... *"will continue to play a vital role in protecting the character and landscape setting of the city.."* but then goes on to say that a green belt review should be undertaken to..... *"guide development to appropriate places while protecting the most important areas" ...as....."it will need to change to meet the growth this plan hopes to achieve"*.

We are frankly fearful that this is code for 'We intend to build on the Green Belt on a scale hitherto unknown'. Clearly given previous comments regarding the population forecasts used in this Structure Plan, it is important that any review of the greenbelt is based on realistic estimates of growth. Otherwise unnecessary development of the green belt will ensue, given that 60% of housing in Aberdeen City (and nearly 30% of ALL housing as proposed in the Plan), is proposed to be on city greenfield sites, the majority of which will inevitably be in the Green Belt.

This issue is particularly important in view of the use of the High Case scenario, leading to a very high forecast for population growth, in turn leading to a very high housing requirement. When we then consider the excessively front-loaded housing development for the early years of the plan, there is a clear danger that large areas of the Green Belt would be destroyed both unnecessarily and irrevocably..

One of the elements of the high quality of life enjoyed by residents in this area is the very existence of the Green Belt and as that high quality is recognised in the plan as being one of the factors which might attract people to the area, the planning authorities must proceed very carefully with Greenfield development in the city.

The Plan states - **Para 4.23** :

"The green belt around Aberdeen will continue to play a vital role in protecting the character and landscape setting of the city.....Accessible greenspace within and around Aberdeen....will also be important to achieving a high quality environment."

Similarly **Para 4,20** states :

"...natural ..environment is a valuable resource, but one which needs to be protected."

It is essential, therefore, that the proposed joint review of the green belt is subject to local consultation and independent review and that this review includes a re-scheduling of the pace of Greenfield development.