

SPP Review - Priorities for Change

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Policy Ideas

The review is of the SPP as a whole – please consider connections and tensions between policy subjects

Policy Subject/s :

What works?

There remains a need for clear Scottish planning policy guidance which takes account of current and future issues and provides the national policy framework in support of the land use planning system in Scotland – NPF3, SDPs and LDPs. It is important that the linkage between other national strategies, priorities and policies is acknowledged and reinforced where appropriate. It must also reflect the move towards outcomes and how this links with the Community Planning process and Single Outcome Agreements.

What doesn't work?

The existing policy document was a drawing and editing together of the earlier individual NPPG's etc together with some updating of current issues at that time. In this respect there is some duplication and often uncertainty about what is policy and what is guidance. The bulk of the document is supporting information within which the key statements can be lost. It needs to be simpler and clearer. It would benefit from a full review to take account of a wide range of significant changes over recent years and to be more precise and concise.

It also needs to address the issue of how certain types of policy response is tackled by the tiers of development plans. Government are encouraging slimmer more focussed development plans (use of supplementary guidance etc) yet there can be issues in dealing with higher level policies say Natura 2000 sites, SSSIs etc where duplication of policy is made in the various plan tiers. If the SPP was setting out the national policy it may allow subsequent tiers to acknowledge the SPP but not have repetition in SDP's or LDP's. This is only one example; there are others such flood risk, built heritage etc.

Housing is a major subject matter yet there are issues around terms like 'generous' in relation to land supply/housing numbers etc. In broad terms more clearly worded and less ambiguous guidance is required.

Greater recognition needs to be given to the issues for rural areas; they are often more complex than that of city and major population concentrations. Settlement pattern is more dispersed there can be a tension between various policy themes such as sustainable development, reduction in carbon emissions, travel to work, availability of employment, support for services etc.

Why?

Lack of clearly worded policies and confusion between what is or isn't policy is the main cause. This in part created by the current style of the document. The role of the SPP needs to be clearer and how it supports the other tiers of development planning.

Clearer objectives of what underpins the policies and identification of national policies may assist the

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current problem of policy being restated at all levels.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

Both elements are now central to policy implementation and this should be reflected in the new SPP. It may be helpful to establish a number of key themes/objectives for the SPP from which policy and outcomes can be established. These will be able to reflect the objective of sustainable economic development and the drive for economic recovery in the current and projected financial climate. It must however be clear about the priorities and how to address the potential tensions between the drive for development and employment and protection of the environment. The current tension in relation to many wind energy developments is such a case. The relationship with NPF3 and other national documents etc also needs to be clearly defined.

Consideration should be given to:

- the key policy matters for inclusion in the new SPP, are the existing spread of subjects still relevant, should some be removed and/or added;
- How should they be grouped;
- The format of the document. This will also be influenced by the expected audience and primary function of the new SPP. In many instances it provides the evidence base for both policy and decision making as part of the tiered approach to planning in Scotland;
- It also needs to be clear about the weight attached to such policy.
- How will the new SPP be monitored

Is there any scope for use of supplementary guidance? How does the current suite of PANs fit into the new SPP approach.

As a counter balance to the above development plan policy is often challenged by developers, public, councillors as being too inflexible and a key consideration for the SPP will be how to establish sufficient quality and weight of policy without becoming overly prescriptive. It should complement and assist strategic and local development plan making not be a burden to those processes at a time when there is a drive for shorter and quicker turn around in the new style development plans.