

SPP Review - Priorities for Change

Contact Details

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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 : Green Networks & Green Infrastructure

What works?

The general supportive statements for the development of green networks in the SPP (e.g. para 130) are to be welcomed. However, we think that they do not provide adequate emphasis on the multi-functionality and, hence, the multiple benefits that can be derived from developing green networks and green infrastructure. We believe that this topic warrants a heading or sub-heading in its own right that brings together (and adds to) the various references to green networks that currently exist in the SPP to encourage authorities to consider them in a holistic way and to optimise the multiple benefits that they can deliver.

What doesn't work?

The lack of a specific heading where references to green networks are brought together means that the existing SPP fails to highlight the importance of this approach in bringing together a range of different policy goals and delivering multiple benefits/outcomes in an integrated way. In addition, the initial reference to green networks (sitting as it does in the landscape and natural heritage section) tends to emphasise the ecological/biodiversity benefits of a green network approach which, whilst important, effectively pigeon holes it into the 'environmental' box and fails to emphasise the benefits for placemaking, sustainable economic growth and climate change.

In addition, the lack of mention of "green infrastructure" as a term makes the SPP look outdated. As well as this, the lack of clear definitions in the SPP of terms such as green network, green infrastructure, greenspace, habitat networks, ecological networks, ecosystems services etc has led to some confusion among planning authorities. We think that the revised SPP could usefully provide definitions to address this and encourage a consistent approach.

Why?

As above

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?

We would propose that the SPP needs a specific (but not necessarily long) section specifically focused on green networks and green infrastructure that clarifies what exactly these terms mean, emphasises the multiple benefits to be derived from such an approach and encourages a holistic approach, and provides links to the relevant topic areas within the rest of the SPP. In addition, this section needs to more explicitly emphasise the fundamental role of green networks in successful placemaking and supporting sustainable economic growth.

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Policy Subject/s : Landscape & Natural Heritage: Trees and Woodland

What works?

The general support for woodland expansion and the implementation of the woodland removal policy in this section are welcomed and we would want them generally, and some specific references more particular, to be retained. We therefore have some suggestions for amending the text and/or making some minor additions as below.

What doesn't work?

The existing SPP refers to the future publication of advice on planning for forestry and woodlands. This can now refer to the "The Right Tree in the Right Place" guidance, which was published in 2010.

In addition, we think that the SPP could give greater encouragement to local authorities to plan for rural economic development that can accommodate the particular needs of rural industries – in this case, the forestry sector. At present, our experience is that the particular needs of the forestry sector are poorly served by the general economic development/industrial development policies in development plans.

Also, the current wording in the SPP about woodland removal provides some uncertainty about whether removal associated with development will require compensatory planting. We suggest that the revised SPP clarifies this.

Why?

The forestry sector can have very specific requirements in terms of locations for timber processing and storage facilities – which can often be quite different to the general provision for industrial development in rural areas. Flexibility is therefore required and a recognition that local provision, close to timber supply areas, is needed if economic and sustainability benefits are to be maximised.

Woodland expansion (particularly productive (conifer) woodlands) is also reliant on the necessary infrastructure being in place to ensure that the multiple benefits which can be realised from new woodland creation are optimised. This includes rural roading infrastructure where, currently, new woodland creation in a number of areas across Scotland is constrained because the existing road network would be unable to cater for future timber extraction.

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?

We would like the redrafted SPP to highlight the Government's ambition for woodland expansion and to encourage planning authorities to prepare up to date forestry and woodland strategies as supplementary

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guidance to development plans. This is essentially as per the current guidance contained in “The Right Tree in the Right Place” although the SPP might also refer to the Land Use Strategy and the report of the Woodland Expansion Advisory Group which provide more recent context for woodland expansion.

On woodland removal we would suggest that the following sentence in the current SPP (“In appropriate cases compensatory planting may form part of the balance”) be replaced with the wording currently used in NPF2 (para 94 - “Where woodland is removed in association with development there will be a strong presumption in favour of compensatory planting”) as we consider that this more accurately reflects the current policy intent.

The SPP could also usefully confirm that existing mechanisms (i.e. conditions and planning agreements) provide adequate and appropriate mechanisms to secure compensatory planting for woodland removal associated with development. We would be happy to advise on detailed wording for this section.

It would also be helpful if the SPP could encourage planning authorities to consider (as part of the preparation of forestry and woodland strategies) whether there are areas where new woodland creation would be appropriate but where, due to infrastructure constraints, this is currently not possible and, therefore, highlight areas where the roads authority and FCS could work together with Timber Transport Forums to address deficiencies. The SPP could also helpfully note the particular needs of the forestry sector in terms of timber processing and ensure that (where possible) industrial land allocations and policies are in place locally to provide suitable sites that offer sufficient flexibility to cater for these particular needs.

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Policy Subject/s : Mineral/Surface Coal/Landfill Restoration

What works?

The references in paras 235 (Minerals) and 247 (Surface Coal) to considering alternative afteruses once extraction is complete is to be welcomed but, we think, could go further.

What doesn't work?

We feel that a similar statement might also be made in relation to landfill sites and a specific reference could be added linking restoration to the development of green networks, habitat networks and woodland expansion.

Why?

Historically, we believe, opportunities to add value to restoration proposals have been missed because authorities have simply reverted to the 'default' position of restoring land to its previous use – even where that particular use may have little economic, social or environmental value. The change to the wording in the Mineral and Coal sections of the SPP at the last revision to emphasise consideration of alternative afteruses was welcome but, we think, could be taken further in the current revision to ensure that authorities as a matter of routine, look at how the social, economic and environmental outcomes from site restoration can be optimised, in line with their spatial strategy. We believe there are particular opportunities here in relation to the development of green networks, high quality open space, habitat networks and ecological services.

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?

We would like the relevant sections of the SPP dealing with Minerals, Surface Coal and, in addition, landfill to encourage authorities to proactively consider what the optimum afteruse for a site may be, rather than simply restoring a site to its previous use. The SPP could then encourage authorities to consider what the most suitable afteruse might be when informed by their green network/open space strategies and/or related land use plans and to consult with SNH, SEPA and FCS as afteruse proposals are prepared.

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Policy Subject/s : Tourism

What works?

Paragraph 47 of the existing SPP makes a generally positive, supportive statement about the need for planning authorities to support high quality tourism related development in urban and rural Scotland – which is welcome but, in our opinion, does not go far enough.

What doesn't work?

While the general comments about supporting tourism development are welcome they are not specific enough about the need for planning authorities to **proactively** plan for future tourism development, particularly in rural areas. A specific issue for FCS is that a number of key development opportunities have been identified by Visit Scotland and the Enterprise Networks related to the National Forest Estate and, in particular, the network of existing Forest Parks. Our experience is that, unless the local authority proactively identifies and plans for their development then opportunities to maximise the economic benefits from these assets can be missed, while also potentially threatening the high quality landscape and environment upon which they are founded, due to the risk of inappropriate, poor quality developments. The lack of specific policies does little to attract and provide confidence about investing in tourism in Scotland.

Why?

Because of the lack of steer for authorities to proactively plan for tourism related development their stance tends to be to have a generic policy which is reactive. This, in our opinion, limits the scope to optimise the benefits of exploiting tourism related development in key locations in rural Scotland. Authorities need to be more proactive to identify, promote through the plan, and then develop quality guidance on what sort of development is needed and will be accepted in these key locations, to encourage proposals to come forward. A good example of an authority which has done this is Loch Lomond and the Trossachs National Park, where recent work to identify key opportunities and then guide the development industry on the sort of quality design would be accepted has helped to encourage quality applications and realise development potential. A further example is the planning designation which Highland Council gave the Leanachan site on the National Forest Estate which identified the requirement for a masterplan.

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?

We would suggest that the SPP makes a more specific statement which inspires the confidence for the LPA's to proactively consider the potential for the development of the rural tourism offering (founded as it is on the high quality natural environment that we enjoy) in key locations throughout Scotland. This would enable more directional planning policies at a Strategic and Local Development Plan level.

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The SPP should encourage planning authorities to proactively plan for and develop guidance on high quality design of development in the key locations/opportunities identified by Visit Scotland and the Enterprise Networks through the developing Tourism Development Plan for Scotland. In addition, NPF3 could identify spatially key strategic areas/sites where opportunities to develop the tourism offering exist.

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Policy Subject/s : Vacant and Derelict Land

What works?

The general encouragement at para 48 to authorities to bring previously developed land back into productive use “*or to create more attractive environments*” is to be welcomed but we think that the SPP needs to more explicitly encourage authorities to consider the ‘greening’ of VDL as part of the development of green networks, green infrastructure and open space.

What doesn't work?

There are currently references in the SPP (para 48) to the redevelopment of vacant and derelict land (for housing or economic development) or to “*create more attractive environments*”. However, the meaning of the latter part of this statement is unclear and the emphasis remains almost entirely upon restoring sites for development. The lack of reference to considering ‘greening’ of VDL as an alternative discourages authorities and landowners from considering alternative green/soft end uses or temporary solutions.

Whilst some authorities have taken a positive approach to promoting and planning for the greening of vacant and derelict land this is the exception rather than the norm and the actual number of sites turned over to green uses is very small and there remain large areas of land blighted by dereliction for considerable period of time. More explicit encouragement for authorities to consider alternatives would, we believe, help encourage them to take a more positive approach to this and help ensure that sites that will never, or at least not in the short- to medium-term, be developed are considered for alternative ‘green’ uses.

The existing SPP provides no encouragement for the **temporary** green uses of VDL sites that fit with the development strategy for the area, but which may not be developed for some time. This helps to perpetuate the situation whereby many VDL sites have lain unused for as many as 20-30 years. As part of the development of green networks we think that there are opportunities for permanent, temporary and advanced greening of VDL and would like the SPP to encourage planning authorities to consider identifying these as part of their DPs.

Why?

The absence of policies in development plans encouraging permanent, temporary or advanced greening of VDL means that there is little incentive for landowners to consider these solutions as part of the development of green networks as they simply hold on to sites in the hope that they may be developed at some time in the future.

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

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and to emphasise place making?

We would like the SPP to encourage planning authorities, where VDL sites do not fit the future development strategy for the area (i.e. sites are in unsustainable locations), to promote the **permanent** greening of VDL as part of the development of green networks locally and to make this clear in LDP land allocations. This will help to remove 'hope value' among owners of these sites and encourage them to consider alternatives to redevelopment.

In addition, where VDL sites do fit with the development strategy for the area, and are considered suitable for development in the medium to longer term, we would like the SPP to encourage planning authorities to promote **temporary** or **advanced** greening of VDL to reduce the visual impact of these sites and to contribute to sustainable placemaking.