

# 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 : SPP as a whole.

## What works?

### Layout and Presentation

The consolidation of all previous SPPs into one document works well and provides a single point of reference.

### General

Welcome clarification in certain subject areas including Green Belt and Designated Sites, although some areas are still 'light' in supporting information.

## What doesn't work?

### Layout and Presentation

There are no clear distinctions between supporting information, guidance, context, justification and actual Policy. This can result in parties quoting different parts of the SPP to support their position and omitting other parts. Interpretation of the SPP should be made easier by making it clearer what is policy, background or supporting text and guidance. Policies in particular need to be more explicit, precise and focussed. The SPP should be shorter, focus on prioritisation and ensure that clear messages are delivered.

### Relationship to other Policies, Guidance and Documents

The SPP needs to be more explicitly aligned to national policies and strategies such as the NPF. The relationship to the NPF needs to be made more explicit, as does the relationship to other, national policies and guidance which may impact on the Development Plan, not only those produced by the Scottish Government, but by other key agencies. This would help to identify the context within which 'local' policies are produced in Development Plans, and provide the link between Development Plans and national objectives.

### Subject Policies

#### **General**

A number of the subject areas contain lengthy paragraphs of background and supporting information. While this may be necessary in the case of subjects where there has been a lot of change since the previous SPP, it is considered that it may detract from, rather than enhance, the focus of the Policy (which should be made more explicit in any case). It may be possible to include the majority of supporting or background text in a separate document or appendix, if it is really felt that such a level of

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detail is required?

Sustainability and Climate Change do not feature strongly in the Subject Policies and should be given a higher profile, along with Low Carbon development.

## **Economic Development**

The emphasis in this section may need to shift to consider how the Development Plan can contribute to the regeneration and recovery of the economy, through the creation of areas which are attractive to business through joint schemes with initiatives such as the Central Scotland Green Network, to being more open and pro-active to mixed use developments and co-location of employment and other uses. This may also have sustainability benefits in terms of reducing commuting and could contribute to the placemaking agenda.

The existing SPP text has little to say on how economic development should be pursued in such a way that it contributes to the Scottish Government purpose of 'increasing sustainable economic growth'. At present, there are a number of policy tensions between SPP guidance on addressing climate change (paras. 41-44) and that on economic development (paras. 45-48). An improved consideration of how we can achieve accelerated economic growth in a sustainable way would be welcome and could be delivered through a revised section on sustainable economic growth and sustainable development (paras. 33-40) and greater complementarity between the climate change and economic development sections. Particular emphasis on and improved guidance to support low carbon development should also be encouraged.

Town centres are another area where the traditional role is changing and policies may be required to reflect this and the outcomes of recent work on town centres.

## **Housing**

The Housing section would benefit from more clarity and requires to be more precise when requiring the allocation of a "generous" supply of land for housing. The only place where this appears to be defined is in paragraph 75, where a "generous" supply is identified as "A supply of effective land for at least 5 years should be maintained at all times to ensure a continuing generous supply of land for housebuilding." In reality "generous" is likely to be more than simply a 5 year supply and further direction is required here.

Further clarification is required on the interaction and contributions of Local Housing Strategies and Housing Needs and Demand Assessments and their influence on the Development Plan. In many cases delivery of the figures within the HoNDA will not be practical, and while they can inform the LDP, it may only be realistically possible for the LDP to go some way to addressing needs and demand. This should be recognised in the SPP.

There is also some confusion over the definitions used between these documents, which should be consistent, but currently are not, for example references to 'housing targets', 'housing requirements' and 'housing allocations'. These should be clearly defined.

While the section on "Other Housing Requirements" considers Gypsies and Travellers, travelling showpeople and houses in multiple occupation, there is no specific reference to 'particular needs' housing, e.g. sheltered housing, housing for the elderly, for the less able and for conversions. These are areas where a policy steer would be useful in providing housing for all elements of society.

Further detail should be given on the delivery of affordable housing. While the detail is best considered at a local level, guidance on how to address high levels of affordable demand, which could not be met through 'normal' policy provision, e.g. 25% of a site to be affordable housing, should be addressed. Where it would be unrealistic to expect development to meet the demand, guidance on acceptable levels of requirement would be useful, e.g. "no more than ?% of any site should be required for

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affordable housing"?

The section on 'Location and Design of New Development' should place greater emphasis on the need to demonstrate that locational and design factors support the principles of sustainable development and contribute effectively to the greenhouse gas reduction targets.

## **Rural Development**

The current SPP policy has led to considerable variation in rural development policy approaches, and differing emphases on the level of constraint applied to development outside built-up areas across Scotland. This has implications for sustainability, carbon emissions and the landscape. It is suggested that this section of the SPP is comprehensively reviewed and strengthened guidance is provided to improve policy consistency and greater certainty for communities and applicants/developers considering rural development. Consideration of the appropriate balance between development which can genuinely safeguard the social and economic vitality of rural areas while preventing the increasing tendency towards sporadic development, suburbanisation of rural communities and increased long-distance commuting to urban areas. The re-introduction of a policy framework identifying rural accessible and rural remote areas would be beneficial in this regard.

## **Open space and physical activity**

Links could be made here to the NPF and in particular the Central Scotland Green Network, given its high priority. May be scope to enhance this section and make it more focussed on delivering Green Networks, including defining their functions and key attributes.

Paragraph 154 refers to maintenance of open space in new developments, although further guidance on this, as well as adoption, would be welcomed. In particular, statements like "Planning authorities and developers should aim to create new open spaces which are fit for purpose, maintained and sustainable over the longer term", and "Planning authorities and developers should work together to ensure the proper arrangements are in place for the long term management of any proposed open space, landscaping and other common facilities." require to be backed up by more specific guidance or policies. The Council have concerns over the varying standards of open space maintenance, and reference to terms such as "fit for purpose" and "long term management" are not considered specific enough to allow the Council to pursue appropriate maintenance arrangements with developers. We are currently in discussion with COSLA about these issues.

## **Transport**

In moving to a low carbon economy, the promotion of sustainable transport will play an important part and this should be emphasised in the SPP in relation to sustainable modes of transport, the sustainable location of development and the encouragement of active travel for journeys, including commuting.

## **Renewable energy**

The focus is on wind farms, but increasingly issues are arising with single turbines and groups of turbines which should be considered, or at least referred to in the SPP. Given the increasing prevalence of wind farm development and increasing concerns regarding impacts on more sensitive landscape areas, clearer policy guidance on how proposals should be treated within SLAs and National Scenic Areas should be provided.

## **Waste Management**

Further consideration requires to be given to the issues surrounding energy from waste.

## **On-shore Oil and Gas Extraction**

There is a renewed focus on fracking, particularly in light of Dart Energy's proposals for coalbed methane extraction in Falkirk and Stirling. The SPP should be more explicit in relation to these types of processes.

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Why?

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

## **Layout and Presentation**

The SPP should include more explicit and easily recognised policies, with the division between background information, supporting text and policies made clearer. Policies should relate back to national outcomes and the NPF.

Subjects which have been raised recently and will presumably feature more prominently in the SPP include placemaking, design, addressing economic recovery and the low carbon economy.

## **Monitoring**

Again there should be a link between monitoring the SPP and the NPF (Action Programme?). Any scope to link with Planning Performance Frameworks?

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