

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 : 1) Climate Change, 2) Town Centres, 3) Rural Development, 4) Fish Farming, 5) Greenbelts, 6) Transport, 7) Flooding and Drainage

What works?

2) Town Centres

Para 65 on retail impact analysis. The second sentence which states that RIA may also be necessary for smaller retail and leisure proposals is important to retain. In small towns and rural areas proposals for new retail units considerably smaller than 2500 square meters could have significant impacts. It is therefore important to retain reference to this potential requirement in any revised SPP.

3) Rural Development

“Development plans should support more opportunities for small scale housing development in all rural areas,....”

Argyll and Bute Council takes a positive approach to countryside development, however, the above wording is somewhat loose. Some areas are particularly sensitive in environmental terms to new development, do not fit well with or support a sustainable settlement strategy and can be disproportionately costly in terms of public resource required (e.g. bins, school transport, emergency services access). However particular needs of Fragile Areas and Island communities could be noted.

4) Fish Farming

Using a criteria based policy to determine applications.

6) Transport

Local Transport Strategy – Due to funding changes and the fact that these documents are non statutory they may not be prepared in future by local authorities leaving a potential gap in an important area of integration (land use and transport) which has consequences for delivering sustainable development and reducing carbon emissions.

There is also an issue in relation to the advice on the Strategic Transport Network which states as follows:

“New junctions onto the motorway and trunk road network are not normally acceptable, but the case for such junctions will be considered where significant economic growth or regeneration benefits can be demonstrated.” - This can create difficulties in the remote rural context e.g. Settlements with a range of facilities and where it is appropriate to promote population growth may require additional access from the trunk road – as the only main road - to deliver this. The development scales may not be considered

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significant in national terms by the trunk road authority. This has the potential to inhibit development at appropriate locations in rural areas

7) Flooding and Drainage

The advice is generally good.

What doesn't work?

1) Climate Change

Paragraph 44. :- Climate Change (Scotland) Act 2009 requires LDP's to ensure all new buildings utilise low and zero carbon generating technologies etc.

3) Rural Development

There is also an issue in relation to crofting land use which the SPP could usefully address in that it is useful in assisting the integration of different policy areas e.g. land use and transport with Dev Plans taking Regional Transport Strategy into account and vice versa, and also Forestry – encouraged to prepare Woodland Strategies linked to Dev Plans. But there land use issues arising from Crofting policy that are not addressed in the SPP and where conflicts and anomalies in terms of land use policy can arise. Useful to have this matter addressed – Argyll and Bute happy to advise.

4) Fish Farming

The SPP states that Development plans should identify areas which are potentially suitable for new or modified fish farm development and sensitive areas which are unlikely to be appropriate for such development. In practice this spatial approach has many issues which could reduce flexibility and therefore opportunities for industry growth because the practice of zoning areas leads to a precautionary approach for many criteria.

In many areas aquaculture sites are already in the best locations in terms of landscape/seascape and there is significant interest in the development of new sites. The industry is also interested in moving further offshore and increasing the scale of individual developments. There are many benefits from moving further offshore but this may result in a conflict with more isolated and wild areas of coast which are currently considered sensitive to aquaculture development.

5) Greenbelts

Paragraph 161 talks about strategic development plans and local development plans. However the last sentence refers generically to the development plan. It would be helpful if reference could be made to strategic and/or local development plan as appropriate.

Why?

1) Climate Change

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There is a lack of advice on how such an approach should be articulated in practice through LDP's. How do planning authorities determine the relative thermal efficiency of particular developments on individual sites and how it could be improved for example?

4) Fish Farming

Aquaculture developers want both flexibility and certainty but as potential development areas are still subject to locational and environmental considerations then it is considered that this approach does not really give additional certainty to developers.

An additional issue is that many of the criteria identified in the SPP which need to be considered in identifying suitable and unsuitable areas for development do not lend themselves to being used in spatial zoning and therefore the final spatial framework will be based on a small number of criteria only leading to a less robust framework with caveats that a number of other criteria are still to be considered.

5) Greenbelts

It would help make clear that outwith strategic development plan areas that local development plans are the mechanism by which greenbelt boundaries should be reviewed.

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?

1) Climate Change

More detailed advice could be given including suggested policy approaches, or examples given of best practice.

4) Fish Farming

The difficulties and complexity of developing a spatial framework should be carefully considered by the SPP review.

The Aquaculture section should also be reviewed in light of growth targets for finfish and shellfish farming and should consider seaweed farming given that it is proposed to bring under planning control.

The SPP should consider the implications of growth targets and interest in moving further offshore on isolated and wild coast.

7) Flooding and Drainage

Given the requirement for all LDP's to address flooding and drainage and where reference is made to common principles and practice including the Risk Framework and 1:200 year flood maps, might it be possible to produce model policies that could be incorporated in all LDP's? This would provide a common policy approach to flooding, assessment of risk, the requirement for FRA's, DIA's, SUDS etc across all planning authorities.