

Our ref: SR



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Scottish Planning Policy Review
Scottish Government
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Dear Sir or Madam

SPP REVIEW – PRIORITIES FOR CHANGE

We write in response to the above consultation opportunity to set out our thoughts on the current challenges facing the property sector and views on how national policy might be updated to reflect these evolving demands.

As a multi-disciplinary property practice operating across the country for a range of private and public landed interests and with extensive experience in different sectors of the Scottish planning system, we welcome this opportunity to inform the Government's efforts to revisit national policy priorities and support their ambitions to further improve the quality and delivery of outcomes within the system.

As this review seeks to reconsider SPP as a whole and not focus on re-consideration of specific policy topics, our comments relate principally to measures which we consider are in line with the Government's main objective of delivering Sustainable Economic Growth and to emphasise the importance of quality place-making within new developments. This letter therefore seeks to address the final section of the standard proforma and links this to the topics discussed in the existing SPP.

Sustainable Economic Growth / Economic Development

Achieving Sustainable Economic Growth is a clear national objective for the Scottish Government and it is the challenge for the planning system to help deliver this. This objective is as equally important for both development planning, by setting the policy agenda for particular areas, and development management sectors, where the key decisions are made. Although this term has prominence within the existing SPP, we consider it would be worthwhile for the term 'Sustainable Economic Growth' to be clearly defined within the document to assist planning authorities in fulfilling both aspects of these duties and at the outset of the document to reinforce its importance.

Particularly in the development management process, GVA consider that Government priorities in respect to job creation and regeneration outcomes do

require greater emphasis so that these can be reflected in local authority decision making. GVA has extensive experience in respect to the issues surrounding development delivery and have previously provided advice to the Government on the tools available to ensure this is effective.

GVA consider that the revised SPP should place the objectives for sustainable economic growth and the prospects of deliverability at the heart of and underpin all facets of development management decision making. It is considered that this could be achieved by making 'Sustainable Economic Growth' a material consideration for the determination of planning applications, which would provide the objective the greater emphasis it really requires if the economy is to recover in Scotland.

Development Planning

In respect to development planning, GVA consider that for the plan led system to be fully effective, it is necessary for SDPs and LDPs to be competent, robust and based on clear evidence to provide developers with greater confidence on the final outcomes for their investment decisions.

GVA believe that ensuring planning authorities are realistic in terms of deliverability is key, and early forward planning in respect to future infrastructure requirements for developing new sites is essential to avoid the stalling of schemes. This has blighted a high number of significant regeneration projects in the past and greater unveiling of requirements for infrastructure up front by planning authorities would assist.

An issue that should be examined is the level of detail that can be submitted in relation to representations to Proposed LDPs and the subsequent scrutiny that follows. It is not appropriate to limit submissions to a word count given that this could represent the last opportunity to promote development through the plan led system. Very often, the issues associated with issues are complex and limiting submissions to a specific word count is not appropriate.

SPP helpfully sets out the terms of, and scope for progressing Supplementary Guidance. Used in an appropriate manner, SG can provide a particularly useful policy tool, adding appropriate detail to more concise policies within a development plan, where it would be inappropriate to do so within the latter. Our observation as practitioners is that there has been quite varied interpretation of SPP guidance on SG by local authorities, which cannot be in the best interests of any party. As such, we see the SPP review as an opportunity to re-emphasise the terms of SG and hopefully work toward more consistent application of this important strand of planning policy throughout the country.

Renewable Energy

GVA has ongoing experience of a number of major energy and related development projects, including major grid and generating infrastructure and onshore wind energy development.

Whilst the National Planning Framework 2 has included energy infrastructure in number of its national development designations, Scottish Government should

examine further opportunities for the planning system to assist the facilitating of major energy infrastructure projects.

Such measures could potentially include the utilisation of existing legislative powers, whilst also, through the SPP, detailing the planning system's support for a broad portfolio of generation sources, as well as the efficient delivery of essential associated grid and other infrastructure.

In terms of wind farm development, GVA support the positive approach endorsed by the SPP. However, we request that the various online policy guidance updates that are published periodically are publicised more widely as and when the updates become available.

Historic Environment

We acknowledge and support (at paragraph 110) how planning authorities can help to safeguard historic assets through development plans and development management decisions. Equally, SPP should provide a policy context that encourages planning authorities to help find viable solutions to historic assets and in turn, enable them to contribute to sustainable economic growth and regeneration, as indeed it is already noted for.

There is a growing legacy of historic assets where challenging economic conditions have tested viability considerations and their regeneration potential. Knowing the contribution that such assets could be making to greater economic and social prosperity (ie through growth in leisure and tourism for example), we recommend that SPP ensures that it strikes the right balance between supporting best use, whilst preserving special architectural and historic interest. These aims should be re-inforced in SPP, particularly as they relate to the overall focus on sustainable economic growth.

On a related point, Scottish Government should use the opportunity of reviewing SPP to also review the Managing Change in the Historic Environment guidance notes, particularly as this relates to finding the best viable use for historic assets. Matters of viability are most referred to within the "demolition" guidance, however it is equally relevant to other works that would ordinarily require listed building consent. As noted, we anticipate it will become an increasingly critical determining factor in striking a fair balance between safeguarding historic assets, whilst realising their potential in contributing to sustainable economic growth. As such, we recommend that Scottish Government considering adding a Heritage and Viability (or similar) paper to the guidance note series and that particular cross references are made clear within the SPP review itself.

Housing

As it relates to being a critical land use subject within SPP, GVA has been monitoring the rate of housing development within Scotland and the factors which have caused declining rates. In view of SPP guidance on housing requirements and housing land delivery, this raises the question as to how Scotland can move towards the Government target of 35,000 homes per year.

In view of this, we would make some suggestions in terms of how local authorities and the Scottish Government could look to address the above dilemma as part of the SPP review:

1. As part of their LDP preparation, carefully consider the viability of delivering any required infrastructure for large housing sites;
2. If the same sites remain in LDP's consider different mechanisms for funding required infrastructure, including the local authority meeting any upfront costs and securing repayment over time through a charge for each dwelling completed;
3. In identifying new housing allocations consider the proposed scale of development against infrastructure capacity in the locality and whether any tolerances may exist to allow any new infrastructure requirements to be minimised.

Town Centres and Retailing

GVA have completed an annual Town Centres retail bulletin analysing the health of Scotland's retail sector and in particular, its cities and towns, since 2007. From this and the wider market evidence, it is clear that the retail sector is undergoing a significant period of change, which planning authorities must accept and plan for.

The current SPP is clear in the town centres first policy, which GVA strongly support, recognising the wider social and specific planning benefits generated by successful, diverse and viable town centre areas, which offer a mix of uses and services for all demographics of society. The challenges posed for the development of town centres will not be satisfied by one specific policy action, however, GVA consider that national planning policy currently focuses too strongly on considerations of deficiency within local areas rather than the key issues, which are deliverability of proposals and assessments of impact on the vitality and viability of town centres.

Significant academic and industry evidence from across the UK has highlighted that retail impact should be the key criteria when determining planning application proposals for new development rather than the more competition focused policy criteria of retail need/ deficiency. GVA consider that this misplaced focus can encourage planning authorities to reach poorly evidenced conclusions on development plan policy concerning the range and quality of shopping provision within certain areas. Recent experience would indicate that such assessments largely consider quantitative data sources, which often do not reflect the trading performance of particular areas or the quality of existing provision.

Re-prioritisation of the key tests for new retail developments within the revised SPP, which focuses more on considerations of impact on centres, would ensure that high quality development proposals that can deliver sustainable economic growth are not unnecessarily neglected. Further, planning authorities should be encouraged to focus particularly on supporting proposals for 'prime' town centre locations and respond positively to manage the decline of smaller centres in a proactive manner to ensure they meet the needs of their communities in future.

Waste

The waste sector has been the subject of a number of lengthy and complex planning cases over recent years. Whilst continuing to ensure development is directed to appropriate locations, the planning system should facilitate development required for the delivery of the Scottish Government's waste reductions targets outlined in its *Zero Waste Plan*.

The SPP should require that the issue of waste infrastructure be considered as appropriate through development planning process, ensuring that the requirements of both industry and stakeholders are taken into account in order to facilitate the more efficient development management processes in respect of this key infrastructure.

We look forward to receiving confirmation of the receipt of this consultation response and trust that our views will be taken on board in the drafting of the revised SPP. If you require further information on any of the points set out above please contact Steven Robb in the first instance on 01314696014.

Yours faithfully

A handwritten signature in black ink that reads "GVA Grimley". The signature is written in a cursive, slightly slanted style.

GVA
For and on behalf of GVA Grimley Ltd