

## Draft Scottish Planning Policy : Consultation Questionnaire

### Responding to this consultation paper

We are inviting written responses to this consultation paper by Tuesday 23<sup>rd</sup> July 2013.

Please send your response with the completed Respondent Information Form (see 'Handling your Response' below) to:

[sppreview@scotland.gsi.gov.uk](mailto:sppreview@scotland.gsi.gov.uk)

or

SPP Review Team  
Area 2H, Victoria Quay  
Edinburgh. EH6 6QQ

If you have any queries contact:

Helen Wood, Principal Planner 0131 244 7534 [helen.wood@scotland.gsi.gov.uk](mailto:helen.wood@scotland.gsi.gov.uk)  
Carrie Thomson, Senior Planner 0131 244 7529 [carrie.thomson@scotland.gsi.gov.uk](mailto:carrie.thomson@scotland.gsi.gov.uk)

We would be grateful if you would use the consultation questionnaire or could clearly indicate in your response which questions or parts of the consultation paper you are responding to as this will aid our analysis of the responses received.

The consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/Consultations/Current>.

The Scottish Government has an email alert system for consultations, <http://register.scotland.gov.uk>. This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). It complements, but in no way replaces Scottish Government distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

### Handling your response

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the **Respondent Information Form** which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to the responses made to this consultation exercise.

## **Draft Scottish Planning Policy : Consultation Questionnaire**

### **Next steps in the process**

Where respondents have given permission for their response to be made public and after we have checked that they contain no potentially defamatory material, responses will be made available to the public in the Scottish Government Library (see the attached Respondent Information Form). You can make arrangements to view responses by contacting the Scottish Government Library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

### **What happens next?**

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us finalise the document. We aim to publish the finalised Scottish Planning Policy before the end of 2013.

### **Comments and complaints**

If you have any comments about how this consultation exercise has been conducted, please send them to the contact details above.

### **The Scottish Government Consultation Process**

Consultation is an essential and important aspect of Scottish Government working methods. Given the wide-ranging areas of work of the Scottish Government, there are many varied types of consultation. However, in general, Scottish Government consultation exercises aim to provide opportunities for all those who wish to express their opinions on a proposed area of work to do so in ways which will inform and enhance that work.

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience. Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

Typically Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Consultation documents are placed on the Scottish Government web site enabling a wider audience to access the papers and submit their responses<sup>1</sup>. Consultation exercises may also involve seeking views in a number of different ways, such as through public meetings, focus groups or questionnaire exercises. Copies of all the written responses received to a consultation exercise (except those where the individual or organisation request confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4565).

The views and suggestions detailed in consultation response are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

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<sup>1</sup> <http://www.scotland.gov.uk/consultations>

## **Draft Scottish Planning Policy : Consultation Questionnaire**

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

**While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.**

# Draft Scottish Planning Policy : Consultation Questionnaire

## RESPONDENT INFORMATION FORM

This is to ensure that we handle your response appropriately.

### 1. Name/Organisation

Organisation Name

Tactran

Title Mr  Ms  Mrs  Miss  Dr  *Please tick as appropriate*

Surname

Guthrie

Forename

Eric

### 2. Postal Address

Bordeaux House

31 Kinnoull Street

Perth

Postcode PH1 5EN

Phone 01738 475775

Email

### 3. Permissions - I am responding as...

Individual

/

Group/Organisation

*Please tick as appropriate*

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

*Please tick as appropriate*  Yes  No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

*Please tick ONE of the following boxes*

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

*Please tick as appropriate*  Yes  No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

*Please tick as appropriate*

Yes

No

## Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

### PRINCIPAL POLICIES

- 1 Sustainable Economic Growth** **Y** **N**
- Do you think that the measures outlined in paragraphs 15 to 23 are appropriate to ensure that the planning system supports economic recovery and sustainable economic growth?
- Are there other measures to support sustainable economic growth that you think should be covered in the SPP?

- 2 Location of New Development – Town Centres** **Y** **N**
- Do you think that local authorities should prepare town centre health checks, as set out in paragraph 55?
- Are there other health check indicators you think should be included in the SPP?

The transport accessibility of town centres by all modes should be considered as part of any town centre health check, reflecting that effective, efficient and sustainable accessibility is a key factor in supporting the economic, social and environmental wellbeing and sustainability of towns.

- 3 Location of New Development – Town Centres** **Y** **N**
- Do you think that local authorities should prepare town centre strategies, as set out in paragraph 56?

Town centre strategies should maximise the role of sustainable modes - walking, cycling and public transport - for accessing development and facilities and should safeguard and improve public and integrated transport hubs and also consider the role of sustainable town centre logistics to reduce the impact of traffic generally and address air quality issues.

- 4 Location of New Development – Town Centres** **Y** **N**
- Do you think the town centre first policy should apply to all significant footfall generating uses and the sequential test be extended to this wider range of uses, as outlined in paragraphs 63 to 67?
- An alternative would be to apply the sequential test to retail and 'all' leisure development, no longer limiting leisure to 'commercial' development. Do you think this is the appropriate approach?

The sequential test should apply to all significant footfall and traffic generating proposals, including, for example, offices, to ensure that travel by alternative modes to the car is a viable option for commuters and visitors.

## Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

- 5 Location of New Development – Rural Development** **Y N**  
Do you think the approach to spatial strategies for rural areas outlined in paragraphs 68 to 71 is the appropriate approach?

This will ensure that travel by alternative modes to the car is a viable option as much as possible for rural residents and visitors.

### BUILDINGS

- 6 Housing** **Y N**  
Do you think explaining a 'generous' housing land supply as allowing an additional margin of 10 to 20%, as set out in paragraph 85, is the appropriate approach?    
An alternative would be to state that a generosity factor should be added to the land supply, and that this may be smaller in areas where there can be confidence that the sites identified in the plan will be developed in the plan period, and larger in areas where there is less confidence in the deliverability of the land supply. Do you think this is the appropriate approach?

No comment.

- 7 Housing** **Y N**  
Do you think that authorities should be able to include an allowance for windfall development in their calculations for meeting the housing land requirement, as set out in paragraph 86?

No comment.

- 8 Housing** **Y**  
As set out in paragraph 87, do you think strategic development plans should set out the housing supply target:  
a. only for the strategic development area as a whole;   
b. for the individual local authority areas;   
c. for the various housing market areas that make up the strategic development plan area; or   
d. a combination of the above

Option C would be most effective from an integrated transport and land-use planning point of view.

- 9 Housing** **Y N**

## Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

Do you think the approach to how national parks address their housing land requirements, as set out in paragraph 90, is the appropriate approach?

An alternative would be for national park authorities to assess and meet housing requirements in full within their areas. Do you think this is the appropriate approach?

The approach in paragraph 90 would be most effective from an integrated transport and land-use planning point of view.

**10 Housing** **Y N**

Do you think the approach to identifying the five year effective land supply, as set out in paragraph 91, is the appropriate approach?

An alternative approach would be for the supply in strategic development plan areas to be calculated across local development plan areas. This would require strategic development plans to set out housing supply targets for each local development plan. Do you think this is the appropriate approach?

The alternative approach would be more effective from an integrated transport and land-use planning point of view.

**11 Housing** **Y N**

Do you think that the level of affordable housing required as part of a housing development should generally be no more than 25%, as set out in paragraph 97?

No comment.

**12 Housing** **Y N**

Do you think that the approach to addressing particular housing needs, as outlined in paragraphs 100 to 103, is appropriate?

No comment.

**13 Business & Employment** **Y N**

Do you think the regular review of marketable sites for business, as set out in paragraph 110, should take the form of 'business land audits' in order to ensure identified sites are marketable?

The reference to access to the transport network in paragraph 110 is welcomed and supported. This should be extended to refer to "sustainable and effective access to transport networks".

## Draft Scottish Planning Policy - Consultation Questionnaire

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### NATURAL RESOURCES

- 14 Green Infrastructure** **Y** **N**
- Do you think that the provision of green infrastructure in new development should be design-led and based on the place, as set out in paragraph 163?
- An alternative would be to continue with a standards based approach. Do you think this is the appropriate approach?

In the Delivery and Development Planning section, paragraph 158 should include specific reference to the statutory Regional Transport Strategies in addition to the other relevant strategies which are highlighted. In addition to being design-led the provision of green infrastructure should be closely aligned with achieving wider social and environmental objectives through enhanced provision for and promotion of active travel, linked with achieving the health and wellbeing benefits identified in paragraphs 155 - 163.

### UTILITIES

- 15 Heat & Electricity** **Y** **N**
- With reference to paragraphs 214 to 215, do you think heat networks should be developed ahead of the availability of renewable or low carbon sources of heat?
- An alternative would be for heat networks to only happen where there are existing renewable and waste heat sources or networks. Do you think this is the appropriate approach?

No comment.

- 16 Heat & Electricity** **Y** **N**
- With reference to paragraph 218 and subsequent groups, do you think that the proposed increased community separation distance of up to 2.5km is appropriate?

No comment.

- 17 Heat & Electricity** **Y** **N**
- With reference to paragraphs 216 to 219, do you think the proposed approach to spatial frameworks achieves the right balance between supporting onshore wind development whilst protecting the natural environment and managing visual impacts on communities?

## Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

No comment.

**18 Heat & Electricity**

Do you think the SPP could do even more than is drafted in paragraphs 222 to 224 to secure community benefits from renewable energy developments while respecting the principles of impartiality and transparency within the planning system?

**Y N**

No comment.

**19 Digital**

Do you think the planning system should promote provision for broadband infrastructure (such as ducting and fibre) in new developments so it is designed and installed as an integral part of development, as set out in paragraph 230?

**Y N**

The provision of effective and inclusive digital infrastructure is a key factor in reducing the need to travel and contributing to transport carbon reduction objectives.

**20 Flooding & Drainage**

Do you think that Strategic Flood Risk Assessment should inform the location of development, as set out in paragraph 239?

**Y N**

No comment.

**21 Flooding & Drainage**

With reference to paragraphs 245 to 247, do you think that where the Scottish Environmental Protection Agency (SEPA) has already granted a Controlled Activities Regulations (CAR) license then there should be no need for consideration of water and drainage issues by the planning system?

**Y N**

No comment.

**22 Reducing & Managing Waste**

With reference to paragraphs 248 to 262, do you think that planning policy for waste management should be consolidated into the SPP to be clear on the messages and to remove the need for further narrative in Annex B of the Zero Waste Plan?

**Y N**

## Draft Scottish Planning Policy - Consultation Questionnaire

Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

- 23 Overall** Do you think the proposed new structure and tone of the draft SPP is appropriate? **Y** **N**

The overall structure and tone of the draft SPP is supported. However, it is considered that the SPP should make specific references to the role of RTPs and their statutory Regional Transport Strategies in supporting the aims and objectives of the SPP, and in particular RTPs' role as Key Agencies in the Development Planning process. It is recommended that RTPs' status as Key Agencies should be complemented by having statutory consultee status for Development Management proposals which have significant strategic transport impacts and implications and that Regional Transport Strategies (RTSs) are included as "material considerations" in the planning process.

The statutory RTSs should be included within the listed Key Documents referred to in paragraph 190. In addition, under paragraph 193, specific reference should be made to planning authorities working with and discussing the transport implications and appraisal of spatial strategies at an early stage with Regional Transport Partnerships as well as with Transport Scotland. The references to significant travel generating uses and their incorporation within Development Plan Action Programmes being coordinated by planning authorities entering into discussions with public transport providers and operators should also include reference to RTPs.

The apparent omission of reference to the National Transport Strategy in the Key Documents listed in paragraph 190 within a key Scottish Government planning policy document is also questioned.

The reference in paragraph 194 to Development Plans requiring to identify required new transport infrastructure, including cycle and pedestrian routes and the delivery of these, and specifically the role of developer contributions in this, is supported.

- 24 Overall** Do you think the SPP should and can be monitored? If so, how? **Y** **N**

An effective monitoring framework for SPP should be developed in consultation with planning and transportation authorities.

- 25 Overall** Do you think the SPP could be more focused? If so, how? **Y** **N**

## Draft Scottish Planning Policy - Consultation Questionnaire

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There should be a stronger emphasis on the role of transport, the role of Regional Transport Partnerships and their statutory Regional Transport Strategies, and the central role of and need for consistent and effective integration of transport and land-use policy and delivery in supporting sustainable economic growth, social inclusion and carbon reduction within the new SPP.

### 26 Overall

In relation to the Equalities Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on any particular groups of people.

It is noted that this is only a partial Impact Assessment. It sets out a suitable set of population characteristics to be considered. However, this needs to be undertaken on the whole Policy and Tactran is not in a position to comment on the non-transport implications of these.

### 27 Overall

In relation to the Equalities Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

There could be greater emphasis on the importance of accessibility for all equalities groups within the planning system and related transport and connectivity relationships.

### 28 Overall

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on business.

It is noted that this is only a partial Impact Assessment. This needs to be undertaken on the whole Policy and Tactran is not in a position to comment on the non-transport implications of these.

### 29 Overall

Do you have any other comments? If so, please specify the relevant section and/or paragraph.

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## Draft Scottish Planning Policy - Consultation Questionnaire

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Please answer the questions relevant to you and provide further comment, including evidence or justification, in the box provided.

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In view of the central importance of transport and the role of accessibility that is stressed throughout the document reference should be made to the need to ensure that planning and development policies align with the seven statutory Regional Transport Strategies (RTS). As indicated in the response to Question 23 above, RTSs should be listed as Key Documents in paragraph 190 on page 44 of the draft SPP and the National Transport Strategy should also be included here.

In paragraphs 45 and 193 specific references should be made to early discussion with RTPs in regard to RTSs. The role of developer contributions to enable delivery of relevant interventions listed in the STPR and RTS Delivery Plans should be stressed.

The emphasis placed in paragraph 203 on ensuring that granting of planning permission should have specific regard to the availability of sustainable transport alternatives to the car is supported. This should include reference to the production and implementation of effective Travel Plans. The SPP should stipulate the size of development this applies to, to avoid discussion/confusion over what would constitute "significant". Travel Plans can have a major impact on modal shift and it is suggested that these should be a requirement for any development supported by a Transport Assessment and possibly smaller developments as well, in line with anticipated RPP2 objectives relating to encouraging all organisations with more than 30 employees to develop Active Travel Plans in support of achieving Scottish Government's Climate Change Act objectives for transport carbon reduction.

Annex - it is recognised that the proportions of Blue Badge bays is taken from national guidance. However, consideration may need to be given to considering the number of bays in relationship to the proportion of the workforce that are likely to be Blue Badge users.