

Draft Scottish Planning Policy : Consultation Questionnaire

RESPONDENT INFORMATION FORM

This is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Cammo Residents Association

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

McCulloch

Forename

Grant

2. Postal Address

5 Cammo Parkway

Edinburgh

Postcode EH4 8EP

Phone

Email grant.mcculloch@lineone.net

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

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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?

It should be a core value of the service (para3) that decisions are made in a transparent way, such as to engender public confidence, and is inclusive. Groups such as local residents associations (such as CRA) should have a greater influence than at present on local planning outcomes affecting their areas.
A further key outcome should be to protect the natural environment (para13)

- 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?

There should be periodic reviews of the availability of brownfield sites and an accurate assessment of their utilisation to avoid "land banking" by developers and reduce pressure on city leisure space.

- 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?

Such a strategy must include the views and needs of existing local residents, to ensure an equal say to that of developers.

- 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?

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- 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?

More should be said in para 69 about the necessity of protecting prime agricultural land.

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?

The clear effect of allowing a generous approach to land supply is that it ignores all previous grants of development land, where developers have refused or failed to build, yet encourages developers and land owners to push the boundaries to find "better" (ie more profitable) sites. Thus pressure on green belt areas increases and the Government appears to encourage this by this policy, instead of protecting the existing green belt, and environment.

- 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?

Circumstances change. The Army is moving out of certain areas in Edinburgh, yet no account has yet been taken of this windfall. That failure has a knock-on effect on planning.

- 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

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These plans need to be as flexible as possible to allow for circumstantial changes as they arise.

- 9 Housing** **Y** **N**
- 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?

- 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 whole concept of working out the 5 year supply is flawed. Account must be taken of land already earmarked for development, but where developers choose not to develop, whether due to funding issues, or marketing. If developers were to realise that they could be thwarted in future applications because of existing supply, they may be more realistic in their approach to speculative developments. An example can be found in Edinburgh where the Council claim they cannot count the land at Granton & Leith already earmarked for development as part of the 5 year supply as the developers are choosing not to develop it further. That approach skews an accurate method of identifying a 5 year effective land supply. Developers will always try to acquire prime green belt locations whilst holding banks of less suitable sites despite successful applications to develop those sites which must have appeared attractive and economical at the time of application! Regard must also be had of the prevailing economic conditions so that speculative development is not used as a driver to economic growth; rather the economic outlook should influence planning.

- 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?

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I consider that the level should be flexible, to ensure that inappropriate use is not made of prime sites, but that an overall target of 20% across local development plan areas would be fair.

- 12 Housing** **Y** **N**
Do you think that the approach to addressing particular housing needs, as outlined in paragraphs 100 to 103, is appropriate?

- 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?

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?

But always under reservation of existing green belt policy

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?

- 16 Heat & Electricity** **Y** **N**

Please send your response to sppreview@scotland.gsi.gov.uk by **23 July 2013**

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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?

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?

18 Heat & Electricity

Y N

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?

19 Digital

Y N

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?

20 Flooding & Drainage

Y N

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

21 Flooding & Drainage

Y N

With reference to paragraphs 245 to 247, do you think that where the Scottish Environmental Protection Agency (SEPA) has already granted a Controlled

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Activities Regulations (CAR) license then there should be no need for consideration of water and drainage issues by the planning system?

There may be other considerations not relevant to SEPA which would require consultation and assessment

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?

23 Overall

Do you think the proposed new structure and tone of the draft SPP is appropriate?

There are omissions, as mentioned in answers 1 & 29

24 Overall

Do you think the SPP should and can be monitored? If so, how?

25 Overall

Do you think the SPP could be more focused? If so, how?

See answer 29

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.

I am not satisfied that it takes into account the difficulty that many older homeowners have in accessing planning information, and responding to it; that older, or less IT literate, people tend to find internet based consultations impossible to deal with. I understand that government must have a role in setting

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the parameters for a national planning framework, but it, and local authorities, must not lose sight of their obligations to ordinary residents who do not understand planning regulations, or policies. Existing residential areas must be protected from speculative development, and I am not convinced that the proposed SPP protects those groups who may be adversely affected by such development proposals.

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.

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.

29 Overall

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

It is noted that there were no specific questions on the key outcomes, and other policies in the SPP. I have commented at qu1 on 2 key outcomes. Additionally, I would suggest that para 83 should be refined to require the Strategic Development Plan to be finalised BEFORE the housing strategy is completed. Further with regard to transport (paras 189 & 193) the planning system should reduce the need to travel and should appraise the impact of the spatial strategy on the transport network.