

Scottish Planning Policy (SPP) Consultative Draft

June 2009

Northgate Public Services Response

Response

Introduction

1. Northgate Public Services warmly welcomes the opportunity to respond to the Scottish Government's consultation on Scottish Planning Policy (SPP) Consultative Draft.
2. The final part of the consolidated SPP explains the Scottish Government's planning policies on community engagement, outcomes and various subject policies. The subjects are economic development, town centres and retailing, housing, rural development, coastal planning, fish farming, historic environment, natural heritage, open space and physical activity, green belts, transport, renewable energy, flooding waste management, minerals, opencast coal and telecommunications.
3. Our brief response highlights only those subjects raised by the consultation where we believe our particular expertise gives us insight into these sections. It is premised on the basis that all solutions should be focused on quality outcomes which contribute to effective sustainable development.
4. As a leading provider of business process services to planning authorities, we are firm believers that there is a need for greater simplification and clarity within the system so that planning can fully fulfil its potential in promoting well being, and in making a real difference to the quality of life for Scottish citizens.

SSP

5. We support the view of the Scottish Government that a planning system should have policies that are proportionate, practical and informed by early and wide engagement. We agree that planning advice should be clear and consistent and that processes should be effective and efficient.
6. We believe that the consolidated draft SPP makes national planning policy clearer and easier to understand compared with existing SPPs and NPPGs. The structure is simple to understand and the removal of advice and background information helps to make the policy clearer and easier to access.

Community Engagement

7. We warmly welcome the inclusion of a new section on community engagement. This reinforces the importance of community involvement in shaping plans and decision making.
8. Whilst the paragraph on community engagement in the planning process provides a useful overview of the issue, we believe that it could be strengthened. For example, we recommend that reference is made to the importance of an engagement process that recognises the diversity of communities, as well as communities of interest within localities.

9. It is also essential that community engagement is carried out in an equitable fashion. It needs to take account of the importance of providing channels of access and measures to secure the involvement of those most difficult to reach in our communities.

Sustainable Development

10. We do not believe that the overview of sustainable development is sufficiently clear. Firstly, we recommend that a definition is included. This would help to bring greater clarity to the document.
11. Secondly, we believe that the section on sustainable development should not only reflect economic growth and resilience, but also should refer to the need to protect the environment and to promote social justice and community well being.
12. The paragraph relating to climate change is sufficiently clear.

Economic Development

13. We think that it is important that the section on economic development should refer to the need to promote minority held business as part of a process of reducing inequality within Scottish communities.
14. Secondly, whilst we welcome the reference to promoting energy efficiency, we do not believe that this section is radical enough in its approach to using economic development to move towards a low carbon, low waste society.
15. We recommend that reference is made to the need to promote alternative forms of energy as an integral part of economic development.
16. Whilst we recognise that there is a separate section on 'Renewable Energy', we think that this would help to bring greater clarity to this section.

Housing

17. We believe that the section on housing is generally clear. We welcome the reference to the fact that the section states that affordable housing need should be met, where possible, within the housing market area where it has arisen.
18. However, we believe that the document should provide a clearer concept on what planning authorities should include in their supplementary guidance on how the affordable housing requirement for their area is expected to be delivered. This would help to ensure a consistency of approach, whilst providing planning authorities enough flexibility to respond to their local situations, and demands arising from these.

Transport

19. The section on transport places great stress on the need to develop more sustainable forms of transport. We welcome this.

20. We think that the section which refers to personal travel is ambiguous, in that it is not clear whether it refers to individuals on business travel, or those engaged in travel and not on business. We believe that the opportunities for travel should be prioritised by mode irrespective of whether it is business or personal travel. This would encourage businesses to develop flexible forms of working and green travel plans.

Outcomes

21. We warmly welcome this section on outcomes. We firmly believe that outcomes measurement is crucial to effective planning. We agree that the planning system should be judged on the extent to which it maintains and creates places where people want to live, work and spend time.
22. We believe that this section should also refer to the need to ensure that sustainable development is development that brings greater community well being to all in society, helping to reduce significant inequalities within Scottish communities.
23. We also think that greater emphasis could be placed on outcomes by introducing this topic prior to the discussion of the individual subject areas.

For more information

Russell Osborne
Managing Director, Citizen Solutions, Northgate Public Services
russell.osborne@northgate-is.com

Kathy Sutton
Fellows' Associates
ksutton@fellowsassociates.com