

ANGUS COUNCIL

INFRASTRUCTURE SERVICES COMMITTEE

2 JUNE 2009

SUBJECT: SCOTTISH PLANNING POLICY - CONSULTATION DRAFT

REPORT BY DIRECTOR OF INFRASTRUCTURE SERVICES

Abstract: This report comments on and provides a suggested basis for the Council's response to the draft Scottish Planning Policy (SPP). When finalised, the SPP will replace the existing range of nineteen policy subjects contained in National Planning Policy Guidelines and Scottish Planning Policy which have been published over the last 30 years.

1 RECOMMENDATION

It is recommended that the Committee –

1. note the content of the Consultation Draft Scottish Planning Policy (SPP) document which consolidates and sets out the proposed national policy on a range of planning matters; and
2. agree this report as the basis for the Council's suggested response to the Scottish Government.

2 INTRODUCTION

- 2.1 The Scottish Government published a Consultation Draft of Scottish Planning Policy (SPP) on 1 April 2009. The period of consultation extends until 24 June 2009.
- 2.2 National planning policy for Scotland was first published in the 1970's and is currently expressed through a series of Scottish Planning Policies (SPP's) (15 topics) and National Planning Policy Guidelines (NPPG's) (4 topics). As part of the commitment to proportionate and practical planning policies the Scottish Government is rationalising the SPP and NPPG series into a single policy statement of national planning policy. The first part of the consolidated Scottish Planning Policy (SPP) was published in October 2008 and covers the core principles, aspirations and expectations for the planning system. This consultation is on the final part of the SPP, which covers community engagement, sustainable development, the subject policies and the outcomes of the planning process.
- 2.3 The consolidation of the subject policies into the single SPP is not a review of established policy. Existing policy is being rationalised and expressed in more concise terms and will provide a shorter, clearer and more focussed statement of national planning policy. The subject policies that will be covered in the consolidated SPP 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, renewable energy, flooding, waste, opencast coal and radio telecommunications.

- 2.4 Following initial assessment Scottish Government consider that a separate national policy on skiing development, which is currently set out in NPPG 12, is not necessary because other policies (for example economic development, transport, and landscape and natural heritage policies) cover relevant considerations. The role of Architecture and Design Scotland, which is currently set out in SPP20, is not planning policy.
- 2.5 This report highlights the key elements of the draft consolidated SPP and considers land use planning policy issues for Angus Council. When finalised, the consolidated SPP will replace the existing suite of national planning policy documents (NPPGs and SPPs) and will be a material consideration in the preparation of development plan policy and for development management purposes. As is now common with Scottish Government consultations papers, reaction and comment is sought from a range of users through a series of questions (29) to the proposed policies. These are set out in Appendix 1 of this report and together with the main body of the report form the suggested response by Angus Council.
- 2.6 The summary page from the draft consolidated SPP is attached as Appendix 2 to this report and a full copy of the consultation draft (including the initial part of the document published previously in October 2008) has been placed in the Members' Lounge. Alternatively, the consultation draft SPP can be viewed at: <http://www.scotland.gov.uk/Publications/2009/04/01132105/0>, and the initial part of the document at: <http://www.scotland.gov.uk/Publications/2008/10/28115149/0>.

3 DISCUSSION

- 3.1 The draft consolidated SPP is intended to provide a more concise statement of national planning policy, in terms that are clearer and easier to understand for the purposes of development planning, development management and enforcement. Repeated reference to general issues that apply to all forms of development (e.g. community engagement) and much of the detailed advice and background information found in the existing SPPs & NPPGs have been considered superfluous, and have therefore been removed from the draft consolidated SPP.
- 3.2 Whilst considerable gains in reducing the repetition of over-arching policy have been achieved, the removal of background information from the various topic sections inevitably means that the general statements of policy are open to interpretation. As ever, there will be a variety of opinions on what a particular policy statement means, but as the context necessary to resolve disagreements would be absent from the consolidated SPP, in one important sense the changes proposed make national planning policy less clear and more difficult to understand. This has come out in responding to many of the 29 questions the Scottish Government has posed, such as Question 8, Question 10 and Question 11 (see appendix 1).
- 3.3 Against the above however, must be weighed the flexibility the consolidated SPP would give to planning authorities, to provide a local or regional response to achieving national objectives. The lack of detail provides increased flexibility for planning authorities, for example when formulating a strategy for the development plan, and reduces the risk of national policy becoming outdated by (for example)

changes in the economy/changes to economic development strategy. The more general statements of the draft consolidated SPP may therefore be taken to outline planning issues which must be considered in the local context. When read in this manner, the document presents a clearer account of national policy, by removing intervening detailed guidance. By limiting national policy in this way, the requirements arguably become easier to understand, for there are fewer of them.

- 3.4 In summary, the draft consolidated SPP presents national planning policy in a manner that is less daunting for the reader, but which may provide greater scope for disagreement and debate in relation to development planning, development management and enforcement. Overall, the removal of background information and detailed advice is considered acceptable, given the importance attached to the development plan, which can provide the necessary local context to national policy imperatives.
- 3.5 It should also be noted that although the consolidated SPP is not a review of national policy, some changes have been proposed. These are summarised by the Scottish Government as part the introduction to the draft SPP (see appendix 2). The most significant change for Angus concerns the strengthening of policy on prime agricultural land. As noted in response to Question 11, part of the change proposed is already expressed as Policy ER30: Agricultural Land of the Angus Local Plan Review (adopted 2009). This policy restricts development on prime quality agricultural land except where it is necessary to implement the provisions of the local plan, or a part of the local plan strategy. In addition, the draft SPP suggests two other circumstances in which development may be suitable: where it is necessary to meet an established need or where it would be of a small-scale, directly linked to a rural business. Subject to clarification of the terms used (something that could be made through a future Angus local development plan, or through supplementary planning guidance), this change is supported as a proportionate response to future development.
- 3.6 In addition to the proposed changes, it also appears that the summarising and re-ordering of national policy has led to some unintentional alterations in national policy. These alterations are largely technical, but may have undesirable consequences; as such where unintended changes have been identified, these have been noted in the response to questions included at Appendix 1.

4 FINANCIAL IMPLICATIONS

- 4.1 There are no direct financial implications arising from this report.

5 HUMAN RIGHTS IMPLICATIONS

- 5.1 There are no human rights implications arising from this report.

6 EQUALITIES IMPLICATIONS

- 6.1 The issues dealt with in this report have been the subject of consideration from an equalities perspective (as required by legislation). An [equalities impact assessment](#) is not required.

7 SINGLE OUTCOME AGREEMENT

- 7.1 This report responds to a consultation document of an external agency and consequently does not directly contribute to the local outcome(s) contained within the Single Outcome Agreement for Angus.

8 CONSULTATION

- 8.1 The Chief Executive, Director of Corporate Services, Head of Law & Administration and Head of Finance have been consulted in the preparation of this report.

9 CONCLUSION

- 9.1 The consultation draft of the SPP presents a consolidated version of existing national planning policy in a manner that is less daunting for the reader. The summary or omission of advice and background information may however provide greater scope for disagreement in relation to development planning, development management and enforcement. Notwithstanding this, the removal of background information and detailed advice is generally considered acceptable, given the importance attached to the development plan, which can provide the necessary local context to national policy imperatives.

ERIC S LOWSON
DIRECTOR OF INFRASTRUCTURE SERVICES

NOTE

No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

P&T/GDP/KT/IAL
7 May 2009

APPENDIX 1

List of questions and suggested responses:**Q1. Overall is national planning policy clearer and easier to understand in the consolidated SPP compared with existing SPPs and NPPGs?**

Suggested Angus Council response: *The consolidated SPP is intended to represent a concise statement of existing national planning policy (subject to a number of amendments outlined on page 8 of the consultative draft). Whilst considerable gains have been made in removing repetition across the different existing SPPs and NPPGs, the removal of background information from the various topic sections inevitably means that the general statements of policy are open to interpretation. Against this however, must be weighed the flexibility the consolidated SPP gives to planning authorities, to provide a local or regional response to achieving national objectives. When viewed in this light, some of the more general statements may be taken to outline planning issues which must be considered in the local context. These summary statements then present a clearer account of national policy, by removing intervening detailed guidance. In summary, the consolidated SPP presents national planning policy in a manner that is clearer and easier to read, although the increased flexibility for local interpretation may provide greater scope for disagreement in relation to development planning, development management and enforcement.*

Q2. Do you support the proposed structure and format of the consolidated SPP?

Suggested Angus Council response: *The separation of general issues that apply to all forms of development (community engagement & sustainable development) from specific policy detail is welcomed, as this helps to minimise re-iteration throughout the document. From the existing format, is not clear whether the outcomes provide a summary of national policy regarding nature of development, or summarise the envisaged effects of national policy. From reading this section, it is clear that the former is intended; in particular, the information on design and its importance appears for the first time at paragraph 190, when it should be an overriding principle. Because the consolidated SPP is to be considered as a whole, it is not appropriate to structure the document in a manner that suggests the outcomes section ought to be read as a series of conclusions. It is therefore considered that the section entitled: Outcomes should be brought forward in front of the subject policies, so that these paragraphs (189-191) are not overlooked but seen as being of general significance.*

Q3. Do you agree with the removal of advice and background information from the consolidated SPP?

Suggested Angus Council response: *The removal of background information from the consolidated SPP amounts to the removal of the context for national policy, something that may have the effect of facilitating policy misinterpretation and misuse. The lack of detail does however provide increased flexibility for planning authorities, when formulating a development strategy, and reduces the risk of policy becoming outdated by (e.g.) changes in the economy/strategies for economic development. The continued presence of advice concerning the content of development plans, and the approach authorities ought to adopt with respect to development proposals, shows that not all advice has been removed from the consolidated SPP; however more detailed guidance – such as the model policy*

concerning development and the historic environment (SPP23) – has often been omitted. Overall, the removal of background information and detailed advice is considered acceptable, given the importance attached to the development plan, which can provide the necessary local context to national policy imperatives.

Q4. Does this paragraph (35) provide a clear overview of the expectations for community engagement in the modernised planning system?

Suggested Angus Council response: Yes. The content of paragraph 35 reflects the original intentions of the White Paper: Modernising the Planning System. It may however be worthwhile stating the importance of responding to consultation opportunities early in the plan-making process i.e. at the stage of a Main Issues Report. This would be consistent with the statements on early (pre-application) engagement within development management.

Q5. Is the status of this section in relation to the Planning etc. (Scotland) Act 2006 sufficiently clear?

Suggested Angus Council response: Yes. The statements within paragraphs 36 & 37 provide guidance on how planning authorities should contribute to sustainable development, in the course of undertaking any development planning work under Part 2 of the Act.

Q6. Is the role of the planning system in assisting climate change mitigation and adaptation clearly highlighted throughout this SPP?

Suggested Angus Council response: Overt references on how the planning system may assist in climate change mitigation and adaptation are limited, but may be found in paragraphs 39, 123, 137, 146, 150, 151 & 189. However, other statements are clearly related to this issue (e.g. those concerning the efficient consumption of energy at paragraphs 60 & 61) and, as noted in the introduction, climate change is a cross-cutting issue; it is a key part of providing sustainable development. Overall, it is felt that the role of the planning system in contributing to these matters is adequately expressed.

Q7. Is the contribution of the planning system to sustainable economic growth, as explained in this section (Economic Development), clear and easy to understand?

Suggested Angus Council response: The background provided by SPP2: Economic Development – the links between national economic strategy and the economic context to development – provided clarity on the thrust of national policy; on the needs of businesses and how development plans and planning decisions could serve national objectives. Although the intended contribution of the planning system to economic growth is stated in a succinct manner by the consolidated SPP, the policy is broad and will require interpretation at the regional/local level, to show exactly how the planning system will contribute to sustainable economic growth.

Q8. Have the main elements of national planning policy relating to town centres and retailing been included and are they clearly explained?

Suggested Angus Council response: No. Although the sequential approach and the terminology of SPP8: Town Centres and Retailing has been retained, the additional detail concerning the phrases: 'Town Centre'; 'Edge of Town Centre' and 'Commercial Centres'; (paragraphs 11 & 17-19 of SPP8) has not been included in the consolidated SPP. Only the phrases: 'Town Centre' and 'Commercial Centre' are now defined (see footnotes 2 & 3 on page 11). The lack of explanation for the phrase: 'Edge of Town Centre' is of concern insofar as there would be no guidance on how this element of the sequential approach is to be understood. The other main elements of SPP8 – town centre strategies, town centre health checks and the importance of determining a proposal's impact on a centre's vitality and viability – have been included in the consolidated SPP. There is little explanation of what a town centre health check would involve, but this may be a matter for a Planning Advice Note, through the consideration of best practice.

Q9. Have the main areas of national planning policy relating to housing been included and are they clearly explained?

Suggested Angus Council response: The key elements of SPP3: Planning for Homes have been included in the consolidated SPP, although the omission of reference to housing market partnerships, and the policy detail with respect to housing land audits and brownfield redevelopment gives some cause for concern that not all areas have been adequately explained.

Although it is stated in paragraph 53 that local authorities are encouraged to co-operate on a regional basis in planning for housing, the absence of discussion on housing market partnerships is striking. These partnerships are described in the recently published SPP3 as having an important role to play in bringing local authorities together. Indeed, authorities are already being encouraged to form such housing market partnerships in the preparation of local housing strategies and development plans. It is therefore concerning that the importance of these partnerships is not stressed in the draft document.

The aim of monitoring the effectiveness and programming of sites through a housing land audit is described in SPP3 as the maintenance of sufficient effective land for at least the following five years, at all times. The term: 'sufficient' is important here, for it implies that land is not required for its own sake, but to meet the identified needs and demands as stated in the development plan. By contrast, the consolidated SPP states only that a supply of effective land for the following five years should be maintained at all times. Given that the programmed building of houses on any large housing site may extend to five years, the wording of the consolidated SPP is significantly less onerous.

The national policy position on brownfield redevelopment for housing also appears to have been altered by the consolidated SPP. Whilst SPP3 (paragraph 64) stated that the redevelopment of brownfield sites should be preferred to development on greenfield sites, the consolidated SPP only requires prior consideration of brownfield land, whilst also taking into account a variety of qualifications that may prioritise greenfield development in certain instances. Whilst this clearly reflects the sentiments of paragraph 61 from SPP3, it does omit the current presumption in favour of brownfield redevelopment as a matter of principle. The difference between considering some matter as having priority and having to justify a deviation from national policy is significant.

With regard to rural housing development, it is noteworthy that appropriate development opportunities are described in the consolidated SPP under the section on Rural Development and not under the Housing section. The removal of much of the detailed

guidance, such as the requirement for authorities to set out specific circumstances in which housing development may be acceptable on rural brownfield sites (SPP3, paragraph 98), is supported, given the importance attached to the development plan, which can provide the necessary local context to national policy imperatives.

Q10. Have the main areas of national planning policy relating to rural development been included and are they clearly explained?

Suggested Angus Council response: The main elements of SPP15: Rural Development appear to have been incorporated into the consolidated SPP. It is however clear that without the helpful context provided by the text of SPP15, some of the statements – e.g. 'in less populated areas, small scale housing and other development which supports diversification and other opportunities for sustainable economic growth whilst respecting and protecting the natural and cultural heritage should be supported in a range of locations' (paragraph 72) – are open to wide interpretation. It is also noteworthy that the guidance offered by SPP15 in relation to prime quality agricultural land has been significantly expanded (see response to Question 11).

Q11. Do you support the proposed policy on the protection of prime agricultural land?

Suggested Angus Council response: The first part of the proposed policy, set out by the second sentence of paragraph 74, is consistent with Policy ER30: Agricultural Land of the Angus Local Plan Review (adopted 2009). This policy restricts development on prime quality agricultural land except where this is necessary to implement the provisions of the local plan, or a part of the local plan strategy. In addition, the consolidated SPP suggests two other circumstances in which development may be suitable: where it is necessary to meet an established need or where it would be of a small-scale, directly linked to a rural business. These additional provisions are supported, although clarification on what would constitute an established need, what would constitute small scale and what a direct link to a rural business involves would need to be given through the development plan, at a local level.

Q12. Do you support the removal of the specific requirement for development plans to classify coastal areas as developed, undeveloped or isolated?

Suggested Angus Council response: No. The consolidated SPP gives clear advice in terms of the developed coast, the undeveloped coast and the isolated coast. Therefore, the easiest way of ensuring development plan conformity with national policy would be the continued use of this terminology within development plans, in referring to areas of coastline. The removal of the requirement is unlikely to have significant practical effects, although it would provide some scope for planning authorities to consider alternative (but consistent) approaches. Notwithstanding this, it would be more straightforward if the specific requirement were retained.

Q13. Have the main elements of national planning policy relating to fish farming been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP22: Planning for Fish Farming appear to have been incorporated into the consolidated SPP. An obvious omission within this section relates to the lack of guidance concerning the potential impacts of development on the historic marine environment. Although there is no longer any mention of safeguarding against adverse impacts, policy contained within the historic environment section (in particular, paragraph 87) covers these concerns.*

Q14. Have the main elements of national planning policy relating to the historic environment been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP23: Planning and the Historic Environment appear to have been incorporated into the consolidated SPP. It is noteworthy that policy from SPP23 which specifically pertains to Local Development Plans and Strategic Development Plans does not re-appear in the consolidated SPP. Related to this, the model development plan policy of Annex A (SPP23) has been omitted. The broad statements of policy found in paragraph 82 do however provide for a broadly consistent approach to planning policy across the country.*

Q15. Do you agree with the principle of limiting local non-statutory designations to two types?

Suggested Angus Council response: *The proposed limitation amounts to a reduction in the number of local non-statutory designations recognised within national planning policy, from three to two (it is noted that Local Nature Reserves shall remain as an additional, separate designation). The broad nature of the two categories: special landscape areas and local nature conservation sites (see paragraphs 103-106) means that sites currently designated ought to be capable of being re-categorised using the proposed terminology. Although a reduction in the number of terms used ought to make local designations easier to understand, some people will be familiar with the existing terminology where it has been applied to existing sites. The proposed changes may thus be confusing to some individuals, notwithstanding that the purpose for the new terminology is adequately explained in the consolidated SPP. Overall however, the principle of limiting non-statutory designations to two types is considered acceptable.*

Q16. Have the main elements of national planning policy relating to landscape and natural heritage been included and are they clearly explained?

Suggested Angus Council response: *The main elements of NPPG14: Natural Heritage appear to have been incorporated into the consolidated SPP. Some of the terminology used within this section (e.g. 'European protected species' (paragraph 108) & 'Birds directive' (paragraph 98)) would however benefit from references or additional (background) information. Appropriate references appear in NPPG14, to enable for members of the public/planning agents to research the various legislative requirements and it would be preferable to include such detail within the consolidated SPP.*

Q17. Have the main elements of national planning policy relating to open space been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP11: Open Space and Physical Activity appear to have been incorporated into the consolidated SPP. It is noted that the key requirement for an open space audit and strategy remain, and the general advice concerning the quality, accessibility and protection of open space have been included.*

Q18. Have the main elements of national planning policy relating to greenbelts been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP21: Green Belts appear to have been incorporated into the consolidated SPP. It is however unfortunate that one of the key objectives of green belt policy has been abbreviated to the extent that a material change in policy appears to have been made. The first bullet point of paragraph 6 from SPP21 states that green belt policy is to direct planned growth to the most appropriate locations and support regeneration. The role that green belt policy might have in supporting (e.g.) brownfield redevelopment or particular regeneration projects is not however reiterated in the consolidated SPP; this means that planning authorities would be unable to reference national policy support, to show a presumption in favour of its use for this key purpose.*

Q19. Do you support the retention of the policy on the use of maximum parking standards and the relocation of national maximum parking standards into advice?

Suggested Angus Council response: *The retention of the policy on the use of maximum parking standards is supported. This policy could be an important tool in encouraging a sustainable use of the private car, when supported by measures to facilitate increased use of alternative transport modes. Maximum and minimum parking standards also enable authorities to consider the likely effects of development proposals on existing provision in the area. The relocation of national maximum parking standards into advice (i.e. the omission of Table 2, SPP17: Planning for Transport from the consolidated SPP) is supported in that it provides flexibility for planning authorities to determine their own maximum standards for large-scale retail, leisure and business uses. The requirement for people to use the private car to access these uses will depend on whether the surrounding area is predominantly rural (where distances between homes and such facilities are large, and where there are few public transport alternatives), or urban (where distances are less significant, in the context of there being a variety of transport alternatives). Hence it is reasonable to allow scope for different standards to be used across the country.*

Q20. Have the main elements of national planning policy relating to transport been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP17: Planning for Transport appear to have been included in the consolidated SPP. There is however no mention of regional and local transport strategies and how these documents ought to relate to strategic development plans/local development plans, within the consolidated SPP.*

Q21. Do you agree with the integration of policy on spatial frameworks for wind farms over 20 megawatts generating capacity with general planning policy on wind farm development?

Suggested Angus Council response: *Yes. It is sensible to include the annex to SPP6: Renewable Energy within the text of the consolidated SPP.*

Q22. Have the main elements of national planning policy relating to renewable energy been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP6: Renewable Energy appear to have been included in the consolidated SPP. Unfortunately, how the control of on-shore and off-shore wind farm developments interrelate remains unclear, particularly when it comes to managing cumulative visual impact. The consolidated SPP should have considered this issue.*

Q23. Have the main elements of national planning policy relating to flooding and drainage been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP7: Planning and Flooding appear to have been included in the consolidated SPP. It is noted that key elements of SPP7, such as the flood risk policy framework have been included in the consolidated SPP.*

Q24. Have the main elements of national planning policy relating to waste management been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP10: Planning for Waste Management appear to have been included in the consolidated SPP. Advice relating to community engagement on proposals for new waste management facilities (paragraphs 15-18 of SPP10) has been omitted from the consolidated SPP; however this reflects the intent of separating policy on cross-cutting themes (such as community engagement) from subject-specific guidance. It would perhaps have been advisable to note the particular importance of working with communities with regard to large-scale "bad neighbour" developments.*

Q25. Have the main elements of national planning policy relating to mineral extraction been included and are they clearly explained?

Suggested Angus Council response: *The main elements of SPP4: Planning for Minerals appear to have been included in the consolidated SPP. Explanation is succinct, but does not appear to require further clarification.*

Q26. Have the main elements of national planning policy relating to opencast coal been included and are they clearly explained?

Suggested Angus Council response: *This section is not relevant to Angus Council. There are no opencast coal mines within the Angus Council area.*

Q27. Have the main elements of national planning policy relating to telecommunications been included and are they clearly explained?

Suggested Angus Council response: *The main elements of NPPG19: Radio Telecommunications appear to have been included in the consolidated SPP. It is noted that key elements of national policy e.g. the list of material to be submitted in support of a planning application (paragraph 187, consolidated SPP) have been included.*

Q28. How might the consolidated SPP impact positively or negatively on equalities groups?

Suggested Angus Council response: *The consolidated SPP summarises existing national planning policy and does not, in general introduce new policy. Where changes have been made there are no obvious equalities groups that will be negatively affected.*

Q29. Will any groups not identified already in the partial EqIA be affected by the consolidated SPP?

Suggested Angus Council response: *The main groups appear to have been identified.*

APPENDIX 2

Summary page from the draft consolidated SPP:

SCOTTISH PLANNING POLICY (SPP) CONSULTATIVE DRAFT**Introduction**

The foundations of the reformed planning system have been laid through the Planning etc. (Scotland) Act 2006 and associated secondary legislation. *Delivering Planning Reform* set out the shared commitments to speeding up reform of the planning system. The joint actions will result in a planning system where policies are proportionate, practical and informed by early and wide engagement, advice is clear and consistent, processes are effective and efficient, and skills are developed and performance improved.

National planning policy for Scotland was first published in the 1970s and is currently expressed through a series of Scottish Planning Policies (SPPs) and National Planning Policy Guidelines (NPPGs). As part of the commitment to proportionate and practical planning policies the Scottish Government is rationalising the SPP and NPPG series into a single statement of national planning policy. The first part of the consolidated [Scottish Planning Policy](#) (SPP) was published in October 2008 and covers the core principles, aspirations and expectations for the planning system. This consultation is on the final part of the SPP, which covers community engagement, sustainable development, the subject policies currently expressed through seventeen separate SPPs and NPPGs and the outcomes of the planning process.

The consolidation of the subject policies into the single SPP is not a review of established policy. Existing policy is being rationalised and expressed in more concise terms, providing clarity and greater certainty of intended outcomes. The new style of SPP requires a different approach to expressing and explaining national planning policy, but the changes in wording do not, in most cases, represent a change in policy. A change in policy would mean that the intended outcome of the policy is different.

The SPP, when published in its final form, will supersede the following SPPs and NPPGs.

- SPP2: Economic Development
- SPP3: Planning for Homes
- SPP4: Planning for Minerals
- SPP6: Renewable Energy
- SPP7: Planning and Flooding
- SPP8: Town Centres and Retailing
- SPP10: Planning for Waste Management
- SPP11: Open Space and Physical Activity
- NPPG13: Coastal Planning
- NPPG14: Natural Heritage
- SPP15: Planning for Rural Development
- SPP16: Opencast Coal
- SPP17: Planning for Transport
- NPPG19: Radio Telecommunications
- SPP21: Green Belts
- SPP22: Planning for Fish Farming
- SPP23: Planning & the Historic Environment

Our initial assessment is that separate national planning policy on skiing developments, which is currently set out in NPPG12, is not necessary because other policies (for example economic development, transport and landscape and natural heritage policies) cover relevant considerations. The role of Architecture and Design Scotland, which is currently set out in SPP20, is not planning policy.

The consultative draft of the final part of the consolidated SPP is structured to continue on from the published sections of the SPP (Introduction, Development Plans and Development Management). The paragraph numbering therefore starts at number 35.

When published in its final form, the consolidated SPP is intended to be considered as a whole rather than sections being considered independently. This removes the need to duplicate information about cross cutting issues such as climate change, transport, design and the natural and built heritage. The subject policy section focuses on key principles, considerations and actions required, particularly in terms of development plans and development management decision making. Information, advice, policy context and background supplied in the current SPPs and NPPGs has not been included. Restructuring within the subjects policies has aimed to eliminate duplication and resulting minor inconsistencies, and there has been an overall reduction in the amount of detail provided.

Statutory Guidance on Planning and Sustainable Development was published for consultation in March 2007. Taking into account the responses to the consultation and the commitment to scaling back the amount of policy and advice, guidance under section 3E of the Planning etc. (Scotland) Act 2006 has been incorporated into the consolidated SPP.

The final part of the consolidated SPP has been the subject of an environmental assessment, which is focusing on proposed changes to national planning policy and any proposed omissions which could have significant environmental effects. Key amendments that are proposed in the consultative draft are:

- SPP6 Renewable Energy – incorporation of Annex A Spatial Framework for Wind Farms over 20 Megawatts into main policy with resulting restructuring.
- PPG13 Coastal Planning – requirement to classify the coast into one of three types in the development plan is not included but the three types are retained as general guide to development on the coast.
- NPPG14 Natural Heritage – proposed limiting of local designations to two types (special landscape area and local nature conservation area) to limit proliferation of designations.
- SPP15 Rural Development – strengthening of policy on prime agricultural land to indicate the limited circumstances under which its development may be acceptable.
- SPP17 Planning for Transport – national maximum parking standards not included but policy on using maximum parking standards as part of demand management is retained.

Substantive and minor policy changes are summarised in the environmental report, which is being published for consultation at the same time as this document.

We have asked specific questions in the consultative draft SPP, and we are keen to hear your views on these. The questions are set out in Annex 2. We would also welcome your comments on any other aspect of the draft SPP. Responses to the consultation will be analysed and taken into account when the final consolidated SPP is drafted. A consultation report will be published which will discuss the responses received, how they were analysed and how they contributed to the final version.