

Response to Draft Scottish Planning Policy Consultation: Sustainability & Planning

16 December 2014

In our June 2013 response to the draft SPP2, we reiterated concerns around the use of the term “sustainable economic growth” and the potential to undermine or be confused with the well established and understood term sustainable development. We welcome this supplementary consultation as an effort to address some of these concerns.

The use of the term “sustainable economic growth” remains a key concern and we would like to see it removed and replaced with “sustainable development.”

We welcome and strongly support the inclusion of a clear and internationally recognised definition of sustainable development in the SPP, as well as the clear commitment to continued support for the UK shared framework for sustainable development, including the need to live within environmental limits.

However, the following points remain of concern:

- The addition of a presumption in favour of development seems unnecessary given that this has always effectively been the case in Scottish planning decisions. We acknowledge that it is clear that the presumption is only in favour of development that contributes to sustainable development but we are concerned that any presumption on favour of development may give developers a false sense of optimism when proposing inappropriate projects.
- The list of policy principles starts with “to give due weight to net economic benefit”. Although this is not a hierarchical list, it may be interpreted as one. This should be clarified, and to avoid any doubt, the economic benefit principles should come after the environmental management ones.
- The list of policy principles should also refer to the need to have particular regard to designated sites protected for their natural or cultural heritage interest.
- We are concerned that the title of the proposed new section may be confusing as it introduces an additional term “sustainability”. It may be preferable to stick to defined terms.

We are responding as an organisation

We are happy for our response to be made public

We are happy for the Scottish Government to contact us again in relation to this consultation exercise