



RTPI

mediation of space · making of place

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SPP Consultation
Directorate for the Built Environment
The Scottish Government
2 – H Victoria Quay
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11th November 2009

Email to sppconsultation@scotland.gsi.gov.uk

Dear Emma

Scottish Planning Policy Consultation

The Royal Town Planning Institute (RTPI) welcomes the opportunity to respond to this consultation on the Scottish Planning Policy which covers reworked sections of the original draft and additional policy changes flowing from the implementation of recent legislation.

Our response was discussed by members of the RTPI in Scotland's Policy Sub-Committee at its meeting on 5th November. Members of the Sub-Committee were pleased to see that many of their earlier recommendations had been taken on board. The following additional comments were made:

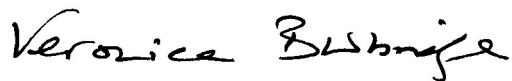
- it would have been useful if a full draft of the new SPP could have been circulated to illustrate the positioning of the policies on sustainable development and climate change in the text. It is considered that these policy statements should be set out at the beginning of the document and should be seen as overall guiding principles; any statutory guidance on the sustainable development duty should be clearly specified;
- it would also be helpful if an explanation could be provided as to the procedure to be adopted for any subsequent additions to, amendment of, or any otherwise updating of the revised SPP, and perhaps identification of a forward list of topics would be useful.
- whilst the inclusion of the UK principles of sustainable development is supported, it is suggested that the SPP should give further emphasis to the principles of 'improving' or 'enhancing' the environment and of 'promoting good governance' and equalities issues

which are embedded in the UK principles; a stronger statement on community involvement is needed to reflect equalities legislation and obligations;

- the inclusion of policies relating to marine spatial planning is supported. It is considered that the second bullet in paragraph 15 might be strengthened to '*ensure that development plans and regional marine plans are prepared in partnership and are complementary*;' and
- it is considered that the SEA of additional parts of the Scottish Planning Policy has enhanced the overall Policy, demonstrated the usefulness of this approach, and prompted a more integrated approach to the definition of the sustainable development duty, which emphasises the role of spatial planning in balancing economic, social and environmental effects, addressing cumulative effects; and encouraging and supporting effective participatory systems of governance.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification or further assistance, please do not hesitate to contact me at our Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, or email: scotland@rtpi.org.uk

Yours sincerely

A handwritten signature in black ink that reads "Veronica Bushnige". The signature is written in a cursive, slightly slanted style.

National Director RTPI in Scotland.