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**Sent:** 18 June 2007 14:22  
**To:** Planning and Sustainable Development  
**Subject:** Response to Sustainable Development Consultation Paper

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Please find attached the City of Edinburgh Council's response to the above consultation paper which was agreed by the Planning Committee on 14 June 2007.

This response can be made public ally available.

Should you have any queries, please get in touch.

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## **City of Edinburgh Council Response to the Scottish Executive Consultation Paper 'Statutory Guidance on Planning and Sustainable Development'**

### **General**

The City of Edinburgh Council welcomes the publication of Statutory Guidance on Sustainable Development to help planning authorities and other stakeholders to meet the requirements of the Planning Act 2006. Sustainable development covers a wide range of matters and it is therefore appropriate that the guidance is lengthy and detailed in places. However, the consultation paper appears unnecessarily long. In order to make it more user friendly, the guidance would benefit from a clearer and more focused structure. For example, much of the general policy context section is repeated elsewhere in the document. It is not clear if this guidance is intended to supersede other existing government planning policy, for example the section on sustainable development in SPP1.

### **Para 18**

Reference is made to the need for close collaborative working between planning authorities and those responsible for the building standards system. Clarification is needed of where the primary responsibility for sustainable buildings lies – planning or building standards. If it is shared between both systems, this should be made clear.

### **Para 32**

Para 32 states that "considerations of layout and design may be signalled in development plans but they are generally more site specific and best handled in supplementary planning guidance or individual cases and in close association with building standards". This appears to contradict Scottish Executive policy set out in "Designing Places" which states that development plans must set out the Council's policies on design. It is recommended that this statement be amended to accord with "Designing Places" and recognise the value of including design policies in local plans to order to provide clear and consistent guidance on these matters.

### **Paras 33 – 34**

This section sets out a range of factors to be taken into account in considering the location of new development. The guidance states that it is the role of development plans to consider the weight to be attached to each factor – this approach is supported. However, the guidance should draw attention to the potential conflicts between the wide range of factors. For example, high density brownfield development may have implications for air quality levels, renewable energy developments may be detrimental to the natural environment and built heritage.

### **Para 35**

Bullet 6 refers to promoting efficient use of land through higher density development. It is recommended that further guidance is added relating to the need for a mix of house types and sizes even in higher density developments to promote mixed, balanced communities.

### **Para 36**

The guidance could usefully refer to the value of well constructed building forms such as the traditional tenement. In Edinburgh, this standard of building has contributed to sustainability as neighbourhoods with a predominantly tenemental character have not been subject to the cycle of redevelopment experienced in some other cities.

### **Para 51**

Para 51 highlights the difficulties in setting outcomes and targets to measure whether sustainable development objectives are being met. It is important that monitoring is an integral component of the development plan process and more detailed guidance is therefore required on this matter. The Scottish Executive is requested to give further consideration to the monitoring of sustainable development objectives and advise on best practice either as part of this guidance or in a Planning Advice Note.