

Your Ref:
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Date: 6 May 2007



Sandra Carey
Scottish Executive
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Victoria Quay
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Dear Ms Carey

**STATUTORY GUIDANCE ON PLANNING AND SUSTAINABLE DEVELOPMENT -
CONSULTATION PAPER**

I refer to your letter and enclosed consultation paper of 29 March 2007, regarding the above.

Outlined below is Renfrewshire Council's formal response to the consultation paper. I also enclose a Respondee Information form.

In terms of the consultation paper the one of the key issues it raises is the actual status of the statutory guidance. The document states that it will sit alongside the Scottish Planning Policy series. If this is the case then it would perhaps be more appropriate for the document to be a SPP in its on right, or to form an annex to SPP1. This would be similar approach to that taken recently by the Department of Communities and Local Government (DCLG) in England where they consulted on Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1. Taking this approach may provide the Council with more leverage when it is trying to promote a more sustainable approach.

The Guidance is a useful publication in the sense that it draws together all the sustainability guidance that is contained within the Scottish Planning Policy series. However it does not actually provide specific new guidance; rather, it refers to the relevant SPP or PAN.


The new provisions for sustainable development in The Planning etc. (Scotland) Act 2006 will help to bring together the locational aspects of sustainable development as part of a long term settlement strategy. The document does reinforce that Development Plans must focus more on environmental outcomes. The document also recognises that planning can contribute to sustainable development through location, design and layout. The consultation document also advises that Plans must make clear how objectives will be met and tested by SEA.

Under the section of design and layout of buildings, it may be useful to contain guidance on managing flood risks through careful layout and building design. As detailed in the recent Town and Country Planning Association publication on Climate Change Adaption by Design - A Guide for Sustainable Communities the aim at the building scale is to minimise exposure to flooding whilst incorporating structural solutions to reduce vulnerability. Building scale flood risk management strategies can include managing flood path ways and removing pinchpoints, raising floor levels, utilising flood resilient materials and using green roofs to reduce runoff.

The publication of the consultation paper on Statutory Guidance on Planning and Sustainable Development is welcomed by Renfrewshire Council as it draws together all sustainability guidance and advice that had been issued by the Scottish Executive relevant to planning, however as stated previously if this document had been published as a SPP or annex to SPP1 then this may have provided more leverage when it is trying to promote a more sustainable approach.

Yours faithfully



 Mr G.C. Russell
Head Of Planning