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Sandra Carey
Scottish Executive
Planning Division
Victoria Quay
Edinburgh
EH6 6QQ

21 June 2007

MMG/mmg

Dear Ms Carey

**CONSULTATION PAPER ON PLANNING AND SUSTAINABLE DEVELOPMENT -
RESPONSE ON BEHALF OF STEWART MILNE HOMES (NORTH SCOTLAND)**

Please find enclosed our response in respect of the above. Due to the impending deadline it has been necessary to email this response. Please note that there is no need to consider any details contained within as confidential.

Should you have any queries or require any additional information, do not hesitate to contact me.

Yours sincerely

Marianne McGowan
Senior Planning and Land Manager

Direct dial: 01224 747325
Email: mmcgowan@stewartmilne.com

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1.0 Introduction

- 1.1 This response is sent on behalf of Stewart Milne Homes (North Scotland); we welcome the opportunity to be involved in this consultation exercise.
- 1.2 As a major housebuilder we are increasingly being asked by Council's to incorporate 'sustainability measures' into our homes. These requests are made without the benefit of meaningful local or national guidance.

2.0 Specific Comments on the Planning and Sustainable Development Guidance

- 2.1 It is widely recognised that the term 'sustainable development' has a myriad of meanings and as a result has been eroded somewhat in its effectiveness and application through over or inappropriate use.
- 2.2 The core principles of sustainable development are based on society, economy and the environment. The emphasis in developed nations, such as the UK, should be on ensuring 'sustainable economic development' to maintain the quality of life that most people enjoy.
- 2.3 Planning and the development industry clearly have a significant role to play, although it is unrealistic to burden individual parts of the public or private sector with such a responsibility. Over recent years most organisations will have become increasingly aware of the sustainability agenda and will have incorporated changes to their culture, way of working or end product.
- 2.4 However, these changes cannot happen overnight and take time to filter through to more mainstream thinking and practice. In some cases, such as building standards, change will be brought about through legislation. In other areas, such as micro-renewables, heightened public awareness will drive change. Finally, forward thinking organisations will be working to meet the anticipated demand of future customers for more environmentally friendly, resource efficient products that remain attractive purchases.
- 2.5 There are instances where initiatives may be technologically sound, but are unsustainable in the broadest sense. One example is combined heat and power systems, where it has been proven that they can work well, but for multiple private homeowners is a maintenance nuisance.
- 2.6 In preparing strategic or local planning documents, local authorities will clearly have regard to the balance between the use of brownfield and greenfield land. This balance is critical, although windfall sites are usually difficult to quantify in advance and are rapidly being developed. It must be remembered that brownfield sites are not always the most sustainable, although it depends on the criteria adopted. Greenfield sites are often well related to existing development and services, can easily be accessed by public transport and do not require the removal of previous buildings or associated remediation work.
- 2.7 The production of supplementary planning guidance outside the development plan framework is cautiously welcomed. However, so many of the basic principles should be founded on existing local plan policies on design, pedestrian linkages, solar gain etc. that duplication is unnecessary if it is simply another checklist. The fact that all plans will now be subject to SEA should further strengthen sustainable credentials.



3.0 Conclusion

- 3.1 It is recognised and accepted that improvements could and should be made in the name of sustainability and at Stewart Milne Group changes have already been adopted and significant work is ongoing. However, the economy is the driving force behind a successful Scotland and it is suggested that sustainable economic development is the correct emphasis for future growth.
- 3.2 In the meantime, the initiatives being brought forward are beginning to address sustainability in the development industry and it is important that the pace continues. But this must not be to the detriment of successful developments or to the cost of pushing aside tried and tested technologies in favour of emerging, innovative ones.
- 3.3 Numerous policy areas are contributing to the goal for sustainable development and a plethora of advice and guidance has been produced, some of it of limited practical use, some contradictory in nature and some only tenuously related to the sustainability agenda. It is therefore important that any new guidance does not simply add to the confusion and become another checklist duplicating existing plans and policies.