

## HILLHEAD COMMUNITY COUNCIL

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### RESPONSE TO Consultation Paper:-

#### STATUTORY GUIDANCE on PLANNING and SUSTAINABLE DEVELOPMENT.

This generally excellent document is **marred** by a emphasis in certain sections on the priority of economic development (e.g. section 14 and section 28 ). This will have the practical effect of undermining guidance where local authorities are concerned.

The priority placed on economic development in the quotation p.4 section 14, and a reference to the priority of economic development. It is essential that all three sustainability considerations (social, environmental and economic), are given equal weighting in this document.

In general this guidance is otherwise well expressed and outlines sensible advice, particularly to local authorities.

We have some reservations on the initial approach and some comments to make on particular sections.

#### p1. GENERAL POLICY CONTEXT: **sustainable development.**

5. The principles are incontestable, but the interpretation is in need of strengthening.

While we agree entirely with the aims of sections 4 – 6, we do not think that this pays sufficient attention to sustainability of communities.

This is particularly reinforced by the quotation on p 4 section 14(outlined), which gives the impression that economic development is virtually the sole criteria, where there may be a conflict of interests.

This is clearly not the case if other objectives, e.g. in housing ,are measured against the criteria.

To give such weighting to this quotation is to undermine some of the other very good aspects of the paper.

We suggest that this quotation is omitted altogether from the final SPP.

We also suggest that 'sustainable communities' is explicitly added to this general policy. It would clarify the indirect allusions to this where they occur in subsequent sections.

In many areas, not exclusively urban, the housing market is skewed by buy-to-let and communities are overwhelmed by Houses in Multiple Occupation. While rental property is an essential element of housing, concentrations and excessive financial power of this sector can adversely affect the building stock, the viability of a community and ultimately the availability of housing. We trust this will be addressed in future legislation.

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### sustainable development (continued)

- Other factors in planning also affect community sustainability . We comment below where relevant to aspects of this guidance paper.

#### P4. Planning modernisation

15. We concur with the quotation.

16. We are very pleased to see that the NPF will follow widespread engagement but the participation framework so far is not encouraging. In particular there is widespread ignorance of the NPF and considerable doubt as to what will be included and what the mechanisms will be for ensuring that relevant, qualitative, consultation is carried out. The NPF is likely to have the biggest impact on our lives. Issues of environmental sustainability are certainly important, but so are others.

17. We welcome this.

#### Building standards

18. We wholeheartedly agree with the first sentence.

**However**, in order for this to be effective in encouraging sustainable communities, The discrepancy between planning and building standards, when applied to existing buildings (particularly tenements and flatted dwellings) needs to be addressed.

- Building standards solely take health and safety measures into account when assessing work done. The role of building control is after the event (i.e. after work has been carried out) which is unsatisfactory.

We welcome the proposal for closer relations with planning, but think that if sustainable communities are to be fostered and the existing housing stock and conservation areas maintained and promoted, there will need to be some adjustment in planning.

Planning is about land and space use.

It is also, encouraged by this paper, about sustainable communities.

- Planning should therefore be able to assess, in **advance** of work being done, whether it is desirable in those terms.. E.g. division of rooms, alterations of services in tenements,, all of which can be elements driving out the longer term residents who sustain a community.

[Associated sections:-

20. is relevant in more ways than intended!

32. is to be welcomed.]

18. We would like to be notified of the advice forthcoming from historic Scotland.

#### PLANNING AND SUSTAINABLE DEVELOPMENT.

##### General principles

This section is good.

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### **Planning and transport**

23. In our experience this is an area where interpretation by local authorities has increased problems in the transport system, air quality and quality of life.

- Where an existing system is over-loaded or densification is leading to problems of air quality or loss of valued interstices of green space, this should be treated with caution.
- **Insert** ' except where there is already a clear stress on existing transport nodes.'

24 is relevant to our point also.

### **Living within environmental limits.**

26. We entirely agree.

### **Ensuring a Strong, Healthy and Just Society.**

27. This is an important section which clearly relates to our point about sustainable communities.

We are pleased to see the sentence line 6 p 7 on cumulative impact, which should be retained in the final SPP.

It relates also to our point under 23 above.

### **Achieving a Sustainable Economy**

28. The section on Protection and enhancement of the built, historic and natural environment is an essential counter-balance to the prioritising of economic growth, as is quality of place.

- We welcome the insistence on integrated decision, but fear that in local government the financial needs of the authority may relegate the other principles of sustainability to well below the economic considerations.

In our view they are inter-related.

### **Promoting good governance**

29 We agree with this but think that more proactive measures are needed to encourage the objectives of PAN 81, particularly in Local authorities.

- Consultation is all too often partial information; many questionnaires are vague or designed to lead to a particular conclusion. Consultation they are not.

### **Using Sound Science Responsibly**

Agreed.

### **PLANNING'S CONTRIBUTION**

31-32 agreed.

- We see a conflict between development plans and strategic plans for the main cities here and trust that you do in fact mean development (local) plans. This should not be prescriptive.

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### Location of New Development

33 –34 agreed.

35 We welcome all points but *under* 'Reduce the need to travel'...

- **cf** our remarks under **Transport section 23.** above  
This is to some extent covered under "take account of existing infrastructure" but could be clarified.
- Consultation with local community would be a useful supplement of service providers and a reminder of the value of their local knowledge..

All other points welcomed.

### Design and Layout of Buildings

We suggest rephrasing 'resource efficiency' .

It is clear to the writer but to the community reading this SPP needs to be much clearer.

We suggest '**managing resource efficiently**'.

All other bullet points welcomed.

We suggest that to assist this, under 'Building materials and performance' more information be made available to the general public to enable them to make efficient choices too.

### Operation and maintenance.

38. Insert in line 1 ...maintenance of new **and old** development.

39. We particularly welcome the management of open space and restoration.

- This should apply equally to urban spaces such as parks, which are currently under threat from development and encroachment.

### KEY MECHANISMS

#### NPF

39 Comment:

There is much confusion on whether we are to be consulted further on these. If confidence in the planning system is to be restored it is essential that better and more comprehensive consultation takes place as the areas covered by this are identified. The consultation which took place recently was only a start.

### Development plans

#### Process

40. We entirely agree with the penultimate sentence.

- WE would like to see more specific recommendation here on rivers.
- Preferably there should be a unitary body to deal with rivers, since the development plans of one authority can have marked effects further up or down stream.
- Building on flood plains, intrusions into the river, arrangements for upkeep of river banks, are at best haphazard and at worst dangerous.

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Long term settlement strategies**41. and 42 under transparency**

- If this is to be effective, there will need to be a reduction of the hectares which determine whether an EIA or SEA is required.
  - Many developments are now tailored to come just within this limit but nevertheless have significant effect on the environment.
  - We welcome some attention to developer contributions, but hope that this will not encourage other considerations to be neglected or given lesser priority. (cf. preliminary remarks).

Focus

43. Agreed

Implementation44. **enforcement** (last sentence.)

- This is a major source of difficulty.
- There are not enough enforcement officers to do the work, especially in cities..
- Unless more are employed, this section will fail both in its intention and in the courts.
- This problem should not be solved by reducing the covered by planning law. (To do so would merely increase the frustrations of planners and citizens alike..)

**Supplementary planning guidance**Sustainability standards

45. We especially agree with sentence 5 "authorities must..", **except that** authorities are not necessarily the best judge of this. What mechanism will be put in place?
- We have particular concerns about the nature and quality of consultation by some authorities, as do many other community councils.
46. **On building standards**, cf remarks under section 18 above.

design briefs

47 The intention is approved, but we hope that it will not stifle creativity in approach..

## Design Statements

48 No comment

**Knowledge and skills**Education and training

49 Agreed

Key Agencies and Statutory Consultees

- 50 Community Councils are also valuable sources of local knowledge and should be specifically included on the list of statutory consultees.
- Some local authorities ignore this source of information.

**OUTCOMES**

Agreed.

**CONCLUSIONS**

With the reservations expressed in this response, particularly on those aspects which are likely to frustrate the more excellent intentions of the guidance, this is acceptable.

ENDS