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Dear Madam

STATUTORY GUIDANCE ON PLANNING AND SUSTAINABLE DEVELOPMENT CONSULTATION PAPER

Thank you for the opportunity to comment on the above consultation paper. Please note that the content of this paper has not gone through the normal panel/committee procedures due to transitional arrangements within the Council. I apologise for the delay in replying.

In general, there is much to be welcomed within the paper, however there is a clear and perhaps unbalanced focus on development planning. Whilst it is acknowledged that the development plan does have a central role to play in relation to planning and sustainable development there are other areas within planning which will inevitably impact upon the sustainable development agenda such as development management, conservation, urban and rural regeneration and natural/cultural heritage agendas. The paper also mentions a number of areas which do not fall within the jurisdiction of statutory planning procedures.

The paper has a clear and strong focus on climate change which is logical given that it is arguably the central theme in relation to sustainable development and the most important indicator. However care must be taken in recognising the differing implications for planning of the two strands of mitigation of carbon emissions and adaptation to climate impacts, and their wider relationship to other issues relating to sustainable development.

The Scottish Executive has signed up to five guiding principles for sustainable development in order to turn the concept into a reality. The paper focuses on the development planning perspective in relation to each of these principles and how the planning system can be utilised in order to achieve these objectives. The five principles are:

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

Planning has links into all of these guiding principles. However, it is important to acknowledge that there are a number of sectors which will be required to feed into these guiding principles in order to move towards sustainable development.

It is also noted that development plans cannot deliver sustainable development in isolation. Whilst they can determine future patterns of urban growth and reduce the need to travel, there are other sectors which have an equally important role to play.

This paper acknowledges the difficulties in measuring sustainable development and consequently shies away from developing criteria against which progress or otherwise can be measured. It is suggested that

“the real test will be in the lasting legacy of built development, the protection of our key natural and cultural resources for future generations and the value attached to a place by the people living, working and visiting there.” However it would still be beneficial to develop a set of indicators aimed at assessing the performance of this guidance in the short term. Only then will it become apparent as to whether or not the issue of planning and sustainable development is being approached in the correct manner.

The link between the planning and transport is highlighted as being “*absolutely critical*”. It is straightforward to understand that most new developments should be located adjacent to existing and well established public transport links in order to reduce the need to travel. It is therefore evident that these two areas must collaborate in mapping out future urban growth in the long term to ensure that public transport plays a significant role in new developments from the outset.

A list of factors are introduced which development plans are required to take into account in coming to, what planning authorities believe, are the correct decisions. One of the areas considered is in relation to rural development and regeneration. It is suggested that these areas should be cautiously promoted for development. In the case of rural development there are a range of interests which require to be explored. Although there may be circumstances where such development can help regenerate rural communities, distances travelled and a lack of public transport services can often be issues which work against rural development. It is suggested that instances where rural development can be justified will be extremely limited and that in order to move towards more sustainable forms of development rural development should be approached in a cautious manner. Whilst the logic behind these statements are not contested, it is thought that this presents contradictions with the thrust and terms of SPP15 ‘Rural Development’. Such a policy contradiction presents confusion and further explanation or reconciliation is requested.

Other issues discussed such as the protection of the natural environment, promotion of brownfield sites, maintenance of an effective level of open space and reducing the need to travel have all been long established within the planning system.

The design and layout of buildings is highlighted as another major way in which the planning system can go some way towards sustainable development. Sustainable design and construction is an issue which has gained greater awareness in recent years. Local authorities throughout Scotland are beginning to produce guidance on sustainable design and construction in order to provide developers with a greater idea of what is to be expected from future developments.

While there are some interesting points raised within the consultation document it would appear that much of the issues highlighted are already being undertaken by planning authorities throughout Scotland, one example being long term development strategies. Despite this, it is important to give the consideration of these issues a more formal status to ensure that all of the stakeholders involved are aware of what needs to be taken into account in the development process. This gives the added benefit of making it clear to see where decisions have been derived from.

The links between sustainable development and planning are obvious and it is clear to see that the planning system has a central role to play in making progress. The publication of this document helps to provide more focus on the linkages between the two areas and how the planning system can be utilised to make progress in this much publicised issue.

Yours faithfully



Kenny Campbell
Local Planner