

Scottish Planning Policy and Housing: technical consultation on proposed policy amendments

Cycling Scotland submission October 2020

Question 1 – What is your view on our proposal to remove ‘the presumption’ from the SPP, through the changes set out?

We welcome the proposal if it achieves the aim of the right development in the right place, rather than to allow development at any cost. It is vital that the planning system enables and directs development to the right location.

With regards to the proposal to remove the presumption in favour of development that contributes to sustainable development, this should be considered alongside the proposal to retain the aim of development in the right place. While ensuring sustainable development is critical, there needs to be clarification, as building properties on greenbelt land is often presented as sustainable development when that isn't the case. It needs to be emphasised through SPP implementation that health and environmental benefits do not inhibit growth but do direct it to the right location and in the right form. It is important that development is not only sustainable but that it is also inclusive and equitable, helping to reduce inequality.

Question 2 – What is your view on the proposed changes set out and our aim of clarifying the definition of the 5-year effective housing land supply to reflect the currently exceptional market circumstances?

When identifying land for housing supply, development should be directed to the re-use or re-development of brownfield land and there must be a firm presumption against development of greenfield sites. This aligns to the aim of the right development in the right place.

In response to the current Covid-19 pandemic, the planning system needs to take into account the need to adjust for current and future pandemics. Specifically, it should consider the need for physical distancing which should be incorporated into decisions around space allocation, and sufficient footway and cycle lane width should be provided in new developments. Outdoor space designed to accommodate physical distancing will also benefit accessibility and the permeability of cycling. With regards to land supply for housing, land which will require reliance on the car for transport requirements should not be included in local development plans as suitable land for housing. This will help to ensure that housing land supply remains effective over the medium to long-term and enable an effective response to the Covid-19 and future pandemics.

Infrastructure that supports car-free development both now and going forward should be prioritised in order to help tackle global climate change. There needs to be a focus on working with housing developers on promoting the benefits of active travel and ensuring that developments have good linkages to existing active travel networks and public transport interchanges, as well as local amenities, shops, schools and other services. Where new developments are being planned, primary consideration should be given to connecting to these networks, services and amenities.

New developments should include space for secure cycle storage, as the cost to retrofit suitable facilities is high and secure overlooked indoor cycle storage is the best option. This also helps tackle issues of inappropriate storage of bikes in stairwells and other communal areas which creates a hazard, as well as overcoming inequalities by supporting access to active travel for people living in tenements and flats.

Where linkages to infrastructure do not exist or are not able to be delivered, the decision to permit development in a particular area should be reconsidered accordingly. Accounting for these linkages and ensuring they can be achieved should be a key consideration of designating land as land supply for housing.

Additionally, to further facilitate this, the following recommendation from the Scottish Infrastructure Commission should be considered.

“5. The Scottish Government should lead the development of a place based assessment of long term housing supply and demand across Scotland by 2021, supported by the development of a coherent strategy for the labour market and business opportunities arising from an inclusive net zero carbon economy.”¹

We note the guiding principle “the approach to setting national housing is intended to provide early clarity and to reduce conflict and complexity in the local development plan process”² in the National Planning Framework 4 Housing Technical discussion paper. This is the correct approach to take and should inform decision making processes with regards to land supply for housing.

Question 3 – What is your view on proposed changes to paragraph 125, including (a) the proposed calculation to establish a scale of the 5 year effective land supply in relation to alternatives and (b) the proposed approach to assessing proposals where a shortfall emerges?

No comment

Question 4 – Do you agree that the proposed amendments will not directly impact on other (non-housing) types of development? If not, please provide evidence to support your view.

No comment

Question 5 – Do you agree that fuller impact assessments are not required? If not, please provide evidence to support your view.

No comment

¹ Infrastructure Commission for Scotland (2020) Phase 1: key findings report. A blueprint for Scotland https://infrastructurecommission.scot/storage/247/FullReport_200120a.pdf

² National Planning Framework 4 Housing Technical Discussion Paper (2020) <https://www.transformingplanning.scot/media/1296/national-planning-framework-4-housing-land-targets-technical-discussion-paper-2-march-2020.pdf>