

Landscape Institute Scotland

Inspiring great places

SPP Review Team
Area 2H
Victoria Quay
Edinburgh
EH6 6QQ

15th December 2013

Dear Sirs

Draft Scottish Planning Policy: 'Sustainability and Planning'

Consultation Response

Introduction

The Landscape Institute (LI) is the chartered institute in the United Kingdom for landscape architects, incorporating designers, managers, and scientists, concerned with conserving and enhancing the environment.

The LI is an educational charity and chartered body whose purpose is to protect, conserve and enhance the natural and built environment for the benefit of the public. The LI is committed to the principles of sustainable development by improving the quality of design of urban and rural environments and to the protection and enhancement of our physical and natural environments.

The LI's Scottish Branch (LIS) represents the professional membership within Scotland and is particularly concerned with design, management and planning for the protection, conservation and enhancement of the natural and built environment of Scotland.

Many members have experience of providing landscape advice to developers, local authorities and statutory consultees on site selection, siting, design, landscape and visual impact assessment, construction and research into the as-built effects of development proposals. Members work in the public sector, private sector and the voluntary sector and LIS welcomes the opportunity to respond on behalf of members to the consultation on the draft SPP 'Sustainability and Planning'.

CONTEXT

On November 21, 2006 the UK government announced that it had ratified the Council of Europe's European Landscape Convention (ELC). The Convention's aims are to promote protection, management and planning of all landscapes, including natural, managed, urban and peri-urban areas, and special, everyday and also degraded landscape. It aims to organise European co-operation on landscape issues.

LIS has signed the Scottish Landscape Charter (October 2010) which identifies the importance of Scotland's landscapes and sets out principles that should guide further action in support of maintaining and thereby sustaining the quality and distinctiveness of Scottish landscapes.

RESPONSE TO SPP CONSULTATION QUESTIONS

LIS would like to offer the following answers to questions 1 and 2 which are most relevant to the focus of LIS, but also have some supplementary comments for questions 3, 4 and 5 with regard to Equalities and Regulatory Impact Assessments. Our responses are also contained in the Consultation Response Form which is submitted with this letter.

Q1 Do you think the SPP should include a presumption in favour of development that contributes to sustainable development?

Yes LIS supports this presumption.

Within the context as set out above LIS welcomes and supports the approach that the SPP proposes as it will reflect and support the intentions of both the European Landscape Convention and the Scottish Landscape Charter.

We believe that LIS members have considerable skills to help ensure the sound assessment, design and management of landscapes that would assist in the realization of the presumption in favour of development that contributes to sustainable development.

Q2 Do you think the proposed approach to sustainability and planning is appropriate?

LIS is particularly supportive of the policy principles in in paragraph 7 on page 5 of the consultation paper and indicate an appropriate proposed approach. We would like to especially applaud the contents of bulleted list contained in paragraph 7 and would particularly support the principles in bullets 3, 6, 8, 11 and 12 namely:

Bullet 3 - to make efficient use of existing capacities of land, buildings and infrastructure

Bullet 6 - to support climate change mitigation and adaptation

Bullet 8 - to protect, enhance, and promote access to the natural heritage; including water, air, soil, green infrastructure, landscape, and the wider environment

Bullet 11 - to avoid over-development and protect the amenity of new and existing development

Bullet 12 - to improve health and well-being by offering opportunities for social interaction and physical activity, including sport and recreation.

Q3 In relation to the Equalities Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on any particular groups of people.

LIS are of the opinion that the proposed SPP principles when applied to new or regenerated residential living environments could potentially deliver more positive effects to communities disadvantaged currently by poor quality indoor and outdoor living environments.

Q4 In relation to the Equalities Impact Assessment, please tell us about what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

LIS would suggest that the principle in the SPP to protect, enhance and promote access to the natural heritage can only advance the equality of opportunity of access to this resource that will also contribute to quality of life experiences for all groups.

Q5 In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, positive or negative, you think the proposals in this consultation document may have on business.

LIS's view is that if the principles of the SPP are applied that this would have a positive effect on business interests in both the short and long term, but particularly the latter. The SPP policy proposals should over time result in an improved sustainable environmental quality for business locations and settings, for employee work environments, for promotion to potential clients and marketability of locations for investment needs and requirements, all of which can only be positive for business.

CONCLUSION

LIS is supportive of the draft SPP policy and principles which will encourage an essential direction for decision making for the sustainable design and management of Scotland's landscapes. With this in mind LIS believes it and its members have a key role in bringing specialist professional skills to the process of sustainable planning through sound assessment, evaluation, design, communication and consideration of potential landscape change that may result from development planning considerations. It is only with a sustainable approach to planning and development that our landscapes will be available and presented in a positive and healthy state in the long term, while continuing to be distinctive for future generations to use and enjoy.

Yours faithfully,

Rebecca Hughes,
Policy and Development Officer, Landscape Institute Scotland