

## **Appendix 1**

The consolidation of the sections within the draft SPP on Sustainable Economic Growth and Sustainable Development is welcomed. Combining the previously separate policy principles on sustainable economic growth and sustainable development assists in providing a clearer focus for the SPP. However, in the context of the Government's focus on increasing sustainable economic growth, the Economic Strategy and the spatial expression of the Economic Strategy set out in NPF3 (noted in paragraphs 3-5), there may be an interpretation that economic benefits should take precedence. It should be clarified whether this is the intention. Whilst in some instances this may be the case, in other instances environmentally issues may take priority. Paragraph 1 states that the planning system should contribute to economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the long term. In this regard, while it is useful to consider sustainable development and sustainable economic development together in the same section, the relationship between sustainable development and sustainable economic development – two different concepts – needs to be articulated and clarified.

### **Consultation Question 1**

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

The inclusion within the SPP of a presumption in favour of development that contributes to sustainable development is reasonable, although clumsily worded. As noted above, the presumption may be interpreted inconsistently, particularly in the context of sustainable economic growth.

The presumption may be more simply worded: "This SPP presumes in favour of sustainable development" or, if the Government wants to reflect its central purpose: "This SPP presumes in favour of sustainable development that contributes to sustainable economic growth".

It is noted that the presumption will apply where the development plan is 'out-of-date' or does not contain policy relevant to the proposal. It would be useful to clarify what is meant by 'out-of-date'. Overall, the section would benefit from emphasising that the planning system is plan led, and that the presumption in favour of development that contributes to sustainable development does not extend to development that is contrary to development plan.

### **Consultation Question 2**

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

The proposed approach to sustainability and planning is appropriate, notwithstanding some of the uncertainties surrounding the interplay between sustainable development and sustainable economic growth noted above.

The removal of the policy principle which stated 'significant weight' should be attached to the 'economic benefit of proposed development as a material consideration...' and its replacement with the principle 'to give due weight to net economic benefit' is welcomed, as is paragraph 10 relating to the need for applicants to provide good quality and timely information.

Furthermore we would raise the following points:

- Paragraph 7, bullet point 4: In some instances, the delivery of housing, business, retailing and leisure development will be contrary to the development plan and/or unsustainable. This should be reflected in a qualification of the bullet point.
- Policy Principles: the statement included in the box could usefully be amended to state 'Planning should enable development that creates successful sustainable places across Scotland', thus reflecting chapter 4 of NPF3.