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16 November 2013

Dear Sir/Madam

Draft Scottish Planning Policy: Sustainability & Planning

Built Environment Forum Scotland (BEFS) is a forum that brings together non-governmental organisations with a built environment remit and acts as national intermediary for Scotland's historic environment sector. Through its member organisations, BEFS connects with over 325,000 individuals through 300 organisations.

Our previous response raised issues around the definition of "sustainable economic growth" and the "significant weight" given to economic development. We welcome the consultation on the revised policy on sustainable development and the statement that "the aim is to achieve the right development in the right place, it is not to allow development at any cost". However, if "sustainable economic growth" is for Scotland to flourish this is only possible through "sustainable development", therefore the use of the latter should be sufficient as it is all encompassing.

The presumption in favour of development that contributes to sustainable development combined with the continued emphasis on economic development, particularly if a development plan is out of date, is likely to result in severely compromising some of the other policy principles. Principles requiring the protection and enhancement of Scotland's cultural and natural heritage, and development that contributes to the well-being agenda are perhaps softer principles that could end up being sidelined for short term economic gains. It's worth noting that the list of policies starts with economic benefits and ends with human benefits: in terms of broader public perceptions of the planning system this is unhelpful.

With reference to paragraph 9, when is a local plan out of date? For instance, the Edinburgh City Local Plan was adopted in 2010 with an end date of 2015 but the housing requirements set out recently in SESPlan have overtaken it and as a result planning applications for volume house building on unallocated sites have proliferated. While the City of Edinburgh Council has previously refused consent for development in the greenbelt the Scottish Government Reporter has reversed some of these decisions to meet national housing targets.

Our members therefore do not support the presumption in favour of development that contributes to sustainable development as the presumption is likely to lead to a misinterpretation of sustainable development to facilitate economic growth at the expense of people and places.

The seventh policy principle should read:

- to protect, enhance and *promote access* to cultural heritage, including the historic environment

I hope that these points are helpful. Please get in touch if you would like to explore these views further. We would be grateful if you would keep us informed of developments relating to this consultation.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jo Robertson', written in a cursive style.

Jo Robertson
Senior Policy Officer - Historic Environment