

Review of the Scottish Planning System

Comments from Spokes, the Lothian Cycle Campaign

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Scope of the Review - extract from Review Document:

"We will review the operation of the planning system in Scotland, identifying the scope for further reform with a focus on delivering a quicker, more accessible and efficient planning process, in particular increasing delivery of high quality housing developments. Our aims are to:

- Ensure that planning realises its full potential, unlocking land and sites, supporting more quality housing across all tenures and delivering the infrastructure required to support development.*
- Streamline, simplify and improve current systems and remove unnecessary blockages in the decision-making process.*
- Ensure that communities are more engaged in the process.*
- Continue to meet our statutory and international obligations in protecting and enhancing Scotland's nature and environment.*

In short, the Review aims to achieve, a quicker, more accessible and efficient planning process in order to build investor and community confidence in the system."

Response from Spokes

Spokes agrees there are problems with the planning system as it is at present, and that there is a need for a Review. Our concerns are principally with Edinburgh and the Lothians - conditions in other parts of Scotland may be quite different.

The over-riding consideration is that towns and cities should be sustainable, especially with regard to transport. And the most sustainable option for transport is to reduce the need to travel in the first place. Sustainable cities must therefore be *compact*, so that residential areas have easy access to the facilities residents need - shops, schools, medical centres, leisure. And for health and environmental reasons, *active travel* within compact communities should be given the highest priority; and car use must be kept to a minimum, for reasons of health (eg sedentary lifestyle, stress), air pollution, the environment, and congestion on the streets.

The planning system is currently not meeting these goals. The City of Edinburgh is expanding in a seemingly random and uncontrolled way, with little overall consideration for the transport system and whether public transport and other non-car modes can meet the new demands. We stress that this is not solely a question of providing appropriate cycling, walking and public transport infrastructure. Equally important is to ensure that distances to facilities are short, so that cycling and walking are easy and obvious choices for the bulk of everyday journeys. This means building on existing communities and, in a limited number of cases, creating new communities – not the extensive areas of heartless and remote new housing which we currently see all too often.

Likewise, the uncontrolled increase in car use is causing major air pollution, especially in certain congested and narrow streets. We believe clean air is a basic human right, and we are not getting it.

CYCLING INFRASTRUCTURE

Cycling infrastructure is not being developed in a way commensurate with the new housing. Developers, in our experience, are not prepared to build any infrastructure beyond the bounds of their own development, and major sites are usually broken down into smaller units, so that there is no proper consideration of cycle facilities for the area as a whole. Even where there is a Council area masterplan/ planning brief, our experience is that the Council allows individual developers to get away with designs which pay little heed to the masterplan as regards cycling infrastructure.

Spokes regularly objects to planning applications on grounds of inadequate cycle facilities leading into and from the proposed developments, and connecting residential areas to the amenities they need - workplaces etc - but our suggestions are almost never written in to the conditions of planning consent.

Scotland has a target (sort of) of 10% of all trips to be made by cycle. Developers should therefore be required to show, in their transport appraisals, what measures they are taking, in their proposals, to ensure this target will be met. Any development unable to show this will then be required to make a significant contribution to the LA for cycle infrastructure.

LAYOUT OF TOWNS AND CITIES

Cities and towns can be made more compact by making more use of brownfield sites, with less reliance on greenfield. Brownfield land is normally located within the city and well sited for public transport, as well as for walking and cycling. While SPP currently nominally favours brownfield over greenfield, there are too few constraints to ensure that developers make that choice.

For developers, greenfield is the easy option, but for urban planning, it is a disaster. Public transport lines are over-extended, meaning the car becomes a more favoured choice; cycle routes likewise become too long to be realistic; housing schemes are being built with little or no easy access to amenities and facilities and workplaces - “dormitory suburbs”, with nothing but houses, are becoming the norm.

It is difficult to see how these deficiencies can be remedied under the scope of the Review as outlined above. Making conditions even easier for developers, as the Review proposes, will simply encourage present policies even further. Government policy is also working in the wrong direction; too often, a dormitory suburb is refused planning permission by the Local Authority on grounds of lack of amenities, only for the decision to be overturned on appeal. Developers are 'playing off' the authorities against each other, and the views of the local community are being over-ridden.

The aim of the present review to “meet our obligations” with respect to environmental issues seems grudging and subsidiary to the enthusiastic earlier aims which appear to add up to making life easier for private developers.

OUR PROPOSALS

The following are our constructive suggestions for improvements to the planning system.

First, there is no shortage of brownfield land in Edinburgh and the Lothians, taking into account the many coal fields and other old industrial sites. Councils and developers should be incentivised to use this land as a priority.

Second, vast amounts of urban land could be regained for housing through tighter controls on the use of valuable urban land for car parking. Edinburgh Park is a prime example - one vast car park, punctuated by the occasional office block. The cars which use it cause massive congestion on the road network, and serious air pollution in many parts of the city. Yet the users themselves pay nothing. And Edinburgh Park is well connected for public transport - rail and bus - and with good connecting cycle routes.

The land consumed by car parks - not just for work places, but at retail complexes, leisure centres etc - could be used, in a properly-planned city, for housing. The price we (as a society) are paying for uncontrolled car use is insufficient housing provision, urban sprawl, young people with almost no chance of getting onto the property ladder; as well as congestion, air pollution and a degraded environment. In effect, car use is being handed a massive subsidy, for which the public and the environment are paying.

Clearly there is a role for the private car in the transport mix, but it's a question of balance. If car users had to pay for the parking they currently get for free, some modal shift could be achieved; and the revenue, if it goes to Local Authorities, could pay for better maintenance of the existing road network and better facilities for sustainable travel.

We note with interest that some major organisations – for example, the University of Edinburgh - are recognising the 'opportunity cost' of valuable urban land which has traditionally been used for car parking, and are gradually reducing car spaces and increasing car permit costs, so as to return the land to productive and financially attractive uses. The government should institute measures to encourage all owners of such 'dead space' to move in the same direction.

In particular we strongly urge a levy on all retail, leisure, workplace and other premises, based on the number of car parking spaces they provide (over a certain low minimum) for both visitors and staff.

Third, to achieve more housing, a more general land reform is needed. The land on which a property sits currently makes up around 70% of its cost, meaning that there is little money left to build quality housing at an affordable price. While we are no experts in this field, Local Authorities need more powers for compulsory purchase of land at near-agricultural values. There are European models where this works well; we suggest Andy Wightman is worth consulting for his wide knowledge of the issues. Land Reform should also tackle another matter, viz. that property companies can(and do) 'sit on' land without developing it, knowing that the land will increase in value.

In sum, we are opposed to any relaxation of the current constraints on developers, and we believe the role of Local Authorities - who are directly responsible, in planning matters, to their citizens - should be strengthened, with new powers added to ensure that land can be acquired at affordable prices, and that the balance of modal choice is weighted more against the private car and in favour of sustainable modes. As regards the Scottish Government, one of the most effective steps it could take would be the levy on premises which we suggest above, based on numbers of parking spaces