



Carrie Thomson
Scottish Government
SPP Review Team
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12 December 2013

Dear Ms Thomson,

Consultation on Draft Scottish Planning Policy: 'Sustainability and Planning'

Thank you for the opportunity to comment on proposed replacement policy and text for the SPP.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

IfA's Scottish Group has over 200 members practising in the public, private and voluntary sector in Scotland. Furthermore, IfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

Draft Scottish Planning Policy: 'Sustainability and Planning'

General

IfA responded to Scottish Government's consultation on draft Scottish Planning Policy by letter dated 23 July 2013. Paragraph 1.4 of that letter stated

'IfA acknowledges the need for the planning system, where possible, to facilitate economic recovery but this can only sensibly be done by facilitating development which is truly sustainable. Sustainable economic growth needs to be clearly defined and its relationship to sustainable development made apparent.'

Save as is apparent from the answers to the specific questions below, IfA maintains its response in all other respects as set out in its letter of 23 July 2013.

Specific Questions

Question 1: Do you think the SPP should include a presumption in favour of development that contributes to sustainable development?

1.1 No, but IfA does not object to 'a presumption in favour of sustainable development' (see paragraph 1.3 below).

1.2 The key concept in planning terms is 'development', not 'growth'. ('Development' is the touchstone of planning legislation.) Sustainability in this context is achieved by 'sustainable development' which in turn contributes to 'sustainable economic growth'. To focus on economic growth is to put the cart before the horse and risks promoting economic considerations at the expense of social and environmental ones.

1.3 Consequently, IfA does not object to a presumption in favour of sustainable development provided that sustainability is clearly defined and fully embraces the management and protection of the environment including the historic environment. However, the presumption should simply be a presumption in favour of sustainable development. The additional wording proposed (i.e. a presumption in favour of development that contributes to sustainable development [my underlining]) obfuscates and potentially weakens the policy and should be deleted.

1.4 Furthermore, IfA accepts the Brundtland definition of sustainable development although this needs to be supplemented, for instance, by reference to the guiding principles in the UK's shared framework for sustainable development. The reference to this framework in paragraph 4 of the draft text should make clear that 'environmental limits' relate to the historic environment as well as the natural environment.

Question 2: Do you think the proposed approach to sustainability and planning is appropriate?

2.1 See under question 1. In the light of the above, the definition of 'Sustainable Economic Growth' provided in the text box should, in this planning context, be expressly linked to the definition of 'sustainable development'. Furthermore, the reference to 'sustainable places' in the policy principles adds another undefined term (albeit one that is referred to in other documents including the current SPP). Nevertheless, IfA welcomes the recognition in paragraph 7 of the need '*to protect and enhance cultural heritage, including the historic environment.*'

2.2 The reference in paragraph 10 to the provision of supporting information proportionate to the scale of the application may be understandable in some respects. However, the potential for damage to the historic environment is not necessarily proportionate to the scale of the development in question. Archaeological remains are a fragile and irreplaceable resource and significant damage can be caused by small-scale development. In this respect information needs to be provided proportionate to the significance or potential significance of the heritage assets affected and the scale of the potential impact upon the historic environment, not the scale of the potential development.

Question 3: 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

3.1 No comment.

Question 4: 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.

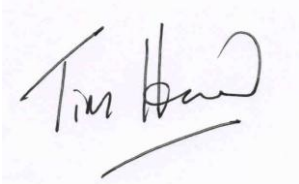
4.1 No comment.

Question 5: 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.

5.1 No comment.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a horizontal line underneath the name.

Tim Howard LLB, Dip Prof Arch
Policy Advisor
Institute for Archaeologists