

SPP Review - Priorities for Change

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Policy Ideas

The review is of the SPP as a whole – please consider connections and tensions between policy subjects

Policy Subject/s : Transport

What works?

The section on Transport is, on the whole, excellent. In general, and with one key exception (see point 1, below), we see little reason for substantial changes to the text in this section, and in particular the introductory section (paras 165-170).

What doesn't work?

1. 'Aviation and Seaports' section

The 'Airports and Seaports' section omits any reference to the substantial negative environmental impacts associated with these developments, stressing only positive economic impacts (which themselves are contested). Given that aviation, in particular, is widely recognised as the most polluting form of transport, it is a major inconsistency in the Transport section of the SPP that it promotes (in para 165) modal shift away from less sustainable modes of transport (cars, road freight) but omits reference to modal shift away from an even less sustainable mode of transport (aviation).

We would note that Scottish spatial planning policy at least as far back as 1999 has recognised the negative impacts of aviation (see e.g. NPPG17 (April 1999): "[Development at airports] gives rise to environmental and other concerns including issues relating to road and rail access, traffic generation and noise."). Given the now much greater awareness of the impacts of climate change, and the legal obligation to reduce climate emissions under the *Climate Change (Scotland) Act 2009*, it is unacceptable for this section of the SPP to remain so deeply biased and uncritical with respect to planning for aviation. We recommend that para 177 be amended so as to include the text used in NPPG17.

2. Implementation of transport policies contained in SPP

It is our observation that there is little evidence that the transport guidance outlined in SPP are widely implemented in practice. Furthermore, we are unaware of any detailed monitoring as to whether the guidance in SPP is followed by planning authorities, consider this a substantial omission, and recommend that the Scottish Government put in place a comprehensive system of monitoring in this area.

We do, however, know that the Scottish Government itself, in its own role as a planning authority, is most certainly *not* following the guidance set out in para 165 that "[t]he planning system should support a pattern of development which reduces the need to travel". Given that the Scottish Government's Budgets have over the past five years provided for a 40% increase in expenditure on roads while the budget for sustainable transport has remained flat, it is evident that the Scottish Government itself is failing to follow the guidance set out in SPP to prioritise the sustainable transport modes.

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Why?

See above.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

See above.