

15 April 2004

Ms Lynn Jameson
Scottish Executive Development Department
Planning Division
2-H
Victoria Quay
Edinburgh EH6 6QQ

Dear Ms Jameson

Consultation on Draft Scottish Planning Policy (SPP) 17 Planning for Transport

Further to Mr Tom Williamson's letter of 16 January 2004, Homes for Scotland is grateful for the opportunity to comment on the consultative draft of SPP17 Planning for Transport.

Homes for Scotland is the representative membership body for the home building and residential development industry in Scotland. Our member companies build over 80% of all new homes in Scotland and the industry is the largest user of the planning system in Scotland. Accordingly, I am pleased to present our detailed observations as follows:

1. Summary

(a) paragraph 5

With regard to the aims contained within this paragraph, Homes for Scotland is of the view that opportunities and constraints cannot be identified without long-term settlement plans.

(b) paragraph 7

With regard to the final sentence which refers to new trunk road and motorway junctions, Homes for Scotland believes that:

- (i) A distinction requires to be drawn between trunk road and motorway junctions.

- (ii) Any presumption against new trunk road or motorway junctions (see paragraph 12) will be an inhibitor to both future development and planning of investment. The need for major highway improvement should be treated on merit.

2. Paragraph 9

“Major transport infrastructure may be funded from various public and private sources, including developer contributions.”

Homes for Scotland is of the view that this paragraph should quote from Circular 12/1996 in terms of:

- planning purpose
- relationship to proposed development
- scale and kind
- reasonableness

3. Paragraph 12 – penultimate sentence

“There is a general presumption against new motorway or trunk road junctions.”

As detailed in 1 (b), Homes for Scotland believes that the statement is far too prescriptive and should therefore be deleted.

4. Paragraph 12 – final sentence

“The Scottish Executive may consider such junctions where nationally significant economic growth or regeneration benefits can be proven.”

The word “may” should be deleted and the word “will” inserted.

5. Paragraph 28

In respect of developer contributions, Homes for Scotland is of the view that these should be limited to expenditure designed to facilitate the use of public transport but should not, either directly or indirectly, be used to subsidise the commercial operations of public transport providers.

I trust that the above comments are helpful and would be happy to provide additional comment on any matter dealt with in this letter if this would be of further assistance.

A completed respondee information form is also enclosed and I confirm that we have no objection to our comments being made publicly available.

Yours sincerely

Allan Lundmark
Director of Planning & Communications