



Draft Regulations on Development Planning

February 2008

Introduction

The Federation of Small Businesses is Scotland's largest direct-member business organisation, representing over 19,000 members. The FSB campaigns for an economic and social environment which allows small businesses to prosper.

We welcome this opportunity to follow up the comments we made in our response to the Planning etc. (Scotland Bill) and to submit this response to the points made in the proposed Development Planning regulations which are most relevant to small businesses.

Issues

1. Consultation and Publicity

While we appreciate the reasons for not including a longer list of statutory consultees for either Strategic Development Plans or Local Development Plans, we would strongly recommend that it becomes incumbent on the Development Planning authorities to consult formally with the business community, which is not realistically represented by the current list of key agencies. It is of particular concern that planning authorities will not be required to consult with any organisation representing small businesses and we would urge that this is addressed.

2. Vision Statements

The importance of small businesses to the national and regional economies is often overlooked. We would suggest that there is an excellent opportunity to redress the balance by including the relative importance of small businesses to each Strategic or Local Development Plan area within the economic sections of Vision Statements. This would allow specific policies to be drawn up relating to the requirements of smaller businesses where they are recognised as being of major significance to the economy of the Development Plan area.

3. Action Programmes

We welcome the proposals for the preparation of action programmes which will set out how key agencies will implement the Development Plans. These Action Programmes will allow the Development Plans to be more closely

monitored and ensure their ongoing effectiveness. We would suggest that the Action Programmes could include the pro-active identification and promotion of key sites for development to make it clearer for developers where applications for appropriate development are more likely to be supported.

4. Impact on Other Areas

It is particularly important that Strategic Development Plans which will largely focus on more urbanised city regions take into account their potential impact not only on neighbouring areas, but also more distant and rural areas. The Strategic Development Plans, while clearly important, should also not take precedence over Local Development Plans which will be vital to the overall Scottish economy.

5. Timetables

The inclusion of fixed timetables for the development and review of Strategic and Local Development Plans is fully supported by the FSB and will hopefully minimise the risk of the new Development Plans becoming as outdated as some Local Plans are within the current system. However, issues can change significantly within even a five-year period and we would suggest that there should be scope for an interim review of the Main Issues Report, linked to the ongoing development of Action Programmes to ensure that Plans are kept as up-to-date and relevant as possible throughout their lifespan. It will also be essential that the proposed timescales are fully adhered to and not allowed to slip.

For further information on any of the points raised in this submission, please contact Eileen Calveley, Policy Manager, on eileen.calveley@fsb.org.uk or 0141 221 0775.