

Response to the Scottish Government Consultation on the Draft Scottish Planning Policy: Sustainability & Planning

**by the Scottish Environment LINK Planning
Taskforce**

Date: 16 December 2013



Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for this community in communications with decision-makers in Government and its agencies, Parliaments, the civic sector, the media and with the public.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through Taskforces – groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

LINK welcomes this additional consultation on Scottish Planning Policy.

Detailed Comments

In our consultation response to the draft SPP earlier in 2013, we raised a number of concerns around the use of the term “sustainable economic growth” and the potential for confusion with the well established and understood term sustainable development. It is therefore very welcome that these concerns have been recognised and that this supplementary consultation seeks to address some of them. The use of the term “sustainable economic growth” remains a general overarching concern and we would like to see it removed or replaced with sustainable development.

The inclusion of a clear and internationally recognised definition of sustainable development is particularly welcome, as is the clear commitment to continued support for the UK shared framework for sustainable development, including the need to live within environmental limits. However, the following matters remain of concern:

- The addition of a presumption in favour of development seems unnecessary given that this has always effectively been the case in Scottish planning decisions. We acknowledge that it

LINK Consultation Response

is clear that the presumption is only in favour of development that contributes to sustainable development but we are concerned that any presumption explicitly in favour of development may give developers a false sense of optimism when proposing inappropriate and unsustainable projects.

- The list of policy principles starts with “to give due weight to net economic benefit”. We realise that this is not a hierarchical list but it may be interpreted as one. This needs to be clear. To avoid any doubt, the economic benefit principles should follow the environmental management ones and it should be made clear that they can not override the other two pillars of sustainable development namely societal and environmental interests.
- For clarity and consistency, the eighth policy principle bullet point: “*to protect, enhance and promote access to natural heritage; including water, air, soil, green infrastructure, landscape and the wider environment*” should be reworded to ensure it is not interpreted as just being about protecting and enhancing access. We note that the seventh bullet point on cultural heritage does not refer to access and is perhaps more clear.
- The list of policy principles should also refer to the need to have particular regard to designated sites protected for their natural or cultural heritage interest and non-designated areas of particular value and/or sensitivity.
- The title of the proposed new section may be confusing as it introduces an additional term “sustainability”. It may be preferable to stick to defined terms.
- We note that the policy is intended to form statutory guidance under section 3E of the 2006 Act. This is welcome but the guidance is very brief. Some local authority planning teams and their staff, as well as other planning system stakeholders, will require additional guidance and training to help in assessing whether development truly contributes to sustainable development.

This response was compiled on behalf of LINK Planning Taskforce and is supported by:

Association for the Protection of Rural Scotland

Badenoch and Strathspey Conservation Group

Buglife

Friends of the Earth Scotland

John Muir Trust

Planning Democracy

Ramblers Scotland

LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899). LINK is core funded by Membership Subscriptions and by grants from Scottish Natural Heritage, Scottish Government and Charitable Trusts.

Registered HQ office: 2 Grosvenor House, Shore Road, Perth PH2 8BD tel 01738 630804 email enquiries@scotlink.org
Parliamentary office: 3rd Floor, Gladstone's Land, 483 Lawnmarket, Edinburgh EH1 2NT tel 0131 225 4345 email parliamentary@scotlink.org

LINK Consultation Response

RSPB Scotland

Scottish Wild Land Group

Scottish Wildlife Trust

Woodland Trust Scotland

For more information contact:

Aedán Smith, Convener of the LINK Planning Taskforce,
Head of Planning and Development, RSPB Scotland
On 0131 317 4100 or via email on aedan.smith@rspb.org.uk
or the LINK Parliamentary Officer, Andy Myles
on 0131 225 4345 or via email on andy@scotlink.org
www.scotlink.org

LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899). LINK is core funded by Membership Subscriptions and by grants from Scottish Natural Heritage, Scottish Government and Charitable Trusts.

Registered HQ office: 2 Grosvenor House, Shore Road, Perth PH2 8BD tel 01738 630804 email enquiries@scotlink.org
Parliamentary office: 3rd Floor, Gladstone's Land, 483 Lawnmarket, Edinburgh EH1 2NT tel 0131 225 4345 email parliamentary@scotlink.org