

Response to the National Planning Framework 3 Main Issues Report and the Scottish Planning Policy Consultation Draft

Summary

- We broadly support the new SPP and NPF3
- We are very concerned that the draft SPP and NPF3 MIR heavily imply that economic growth should be given greater emphasis than the environment or society
- The SPP should take a precautionary principle approach to unconventional gas extraction, and designate 2km buffer zones between sites and communities
- The NPF should make it clear that national development status does not establish the need for development at specific locations where this is not clearly defined in the NPF
- National development status should be given to a national ecological network for Scotland
- LINK supports proposals to enhance protection for Scotland's wild landscapes but NPF3 should include a commitment to progress proposals for new national parks

Background

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.

This response sets out our views on the third National Planning Framework for Scotland (NPF3) Main Issues Report (MIR) and the consultation draft of Scottish Planning Policy (SPP). We broadly support both documents. However, there are a number of areas where further improvements are required.

The NPF3 and SPP cover a very wide range of topics and separate member organisations will be submitting detailed responses on a range of matters.

Sustainable economic growth

It is welcome that both the draft SPP and NPF3 MIR state Government's central purpose in full: "*to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth.*" This is often misleadingly shortened to simply: "increasing sustainable economic growth". However, both the draft SPP and NPF3 MIR still give undue prominence to the perceived need to increase sustainable economic growth. We recognise the need for economic development as a key component of genuinely sustainable development, but the manner in which this is expressed in the draft SPP and NPF3 MIR heavily implies that economic growth should be given greater emphasis than the environmental and social elements that are essential to sustainable development and to improving quality of life.

We are of the opinion that *sustainable economic growth* (SEG) has not been properly defined, as opposed to sustainable development which has an internationally accepted definition, as such LINK organisations are increasingly uneasy about its use.

We welcome the continued reference to sustainable development in the SPP but member organisations are concerned that commitment to it is weakened by excessive focus on sustainable economic growth. The SPP, for the first time, also states (paragraph 17) that significant weight should be attached to the economic benefit of proposed developments. This is a significant concern and we think it is unnecessary and confusing. Developers are better placed to decide which projects are of economic benefit and are hardly likely to progress them if they think they will not be. It is also not clear what parameters will be used to consider economic benefit. For example, short term economic benefit could be very damaging to a local economy in the long term if it results in destruction of an important environmental asset, or if development requires significant



restoration and remediation. As a minimum, **it should be made clear that potential economic benefits will not take precedence over protection of the environment or of local communities.**

Short-term economic development is often at the expense of medium to long-term economic development. The major financial shortfalls for the restoration of open cast coal sites that have become apparent following the financial collapse of the two largest open cast coal operators is an unfortunate current example of what can happen when short term economic benefit is allowed to override environmental and community protection concerns.

Wild Land

We commend the Scottish Government for recognising the value of Scotland's wild land in the SPP draft and we support proposals to clarify and strengthen policies that support its protection. For the first time, this makes it clear that windfarms will not be acceptable in National Parks or National Scenic Areas and it identifies further areas of significant protection including areas of wild land identified by SNH. However, SNH has done further mapping work to identify other natural heritage sensitivities, including areas of peatland and areas important for birds, in the form of its Strategic Locational Guidance for Onshore Wind. Given that this is produced by Government's statutory nature conservation advisors, it is surprising and disappointing that it has not been referenced in the SPP. It could provide a very useful national steer to indicate where onshore wind development is more likely to be acceptable, making it more likely that conflicts can be avoided. **The SPP should state that significant weight should be given to SNH's Strategic Locational Guidance for Onshore Wind when planning authorities are preparing their development plans and in development management decisions.**

Unconventional gas and fossil fuels

Unconventional gas extraction, including coalbed methane and shale gas, can result in a wide range of environmental and health impacts. A key risk is in relation to our climate targets: unconventional gas extraction is energy intensive, and burning the gas contributes to emissions. Moreover, the impact of 'fugitive emissions' of potent greenhouse gas methane through leaks, flaring and venting has led scientists to argue that the climate impact of unconventional gas is greater than that of coal. There are also a number of risks in relation to water and soil contamination, air pollution and related health impacts. SEPA currently does not have powers to monitor and regulate methane leakage and air pollution at sites. We are concerned that developments in Scotland are progressing ahead of a thorough review of the full lifecycle environmental and health impacts, and adequacy of the regulatory framework to deal with these new extraction techniques. **We welcome the less supportive tone for unconventional gas in the new draft SPP, but consider that this should be strengthened by taking a precautionary principle approach to all unconventional gas developments, and at least, the SPP should specify 2km buffer zones between sites and communities.**

Historic Environment

The SPP should reinstate and extend the wording dropped under Paragraph 124 to read Planning authorities should ensure they have access to expert historic environment advice, working with a properly maintained Sites and Monuments Record / Historic Environment Record.

National developments

We remain concerned about the process for consultation on National Developments, particularly where they are not location specific, such as for grid infrastructure or high speed rail. **If national development status means that the need for development can not be considered at the**

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.

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application stage, it needs to be made clear that this does not extend to the need for development at specific locations where this is not defined in the NPF.

The continued retention of the Central Scotland Green Network (CSGN) as a National Development is very welcome and the long distance walking/cycling routes are also seen as a positive move.

It is disappointing that proposals for a National Ecological Network for Scotland have not been accepted, even though it is recognised as an excellent long term aspiration in the NPF MIR. We believe that a National Ecological Network would complement the CSGN and help provide the green infrastructure for Scotland that is as essential as our built infrastructure if we are to make Scotland a world class place in which to live work and invest. **National development status should be given to a national ecological network to confirm commitment to green infrastructure.**

It is disappointing that proposals for new national parks have not been taken up. **NPF3 should include a commitment to progress proposals for new national parks.**

This LINK response has been prepared on behalf of the Scottish Environment LINK Planning Task Force and is supported by the bodies listed below:

Scottish Wildlife Trust
 The Association for the Protection of Rural Scotland
 Friends of the Earth Scotland
 John Muir Trust
 Planning Democracy
 Archaeology Scotland
 Ramblers Scotland
 Planning Democracy
 Buglife
 Royal Society for the protection of Birds
 National Trust for Scotland
 WWF Scotland
 Scottish Wild Land Group

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