

## Discussion Paper on National Planning Framework 2 July 2007

### 1. Introduction

NPF 2 offers an exciting opportunity to co-ordinate and deliver on a wide range of Executive policy areas. We welcome the opportunity to input to this process and recognise the broad scope and potential of the NPF in the long-term.

### 2. Guiding principles

In preparing and revising the NPF Ministers are required to exercise their functions with the objective of contributing to sustainable development.

Scottish Environment LINK believes that all land use planning policy and decisions, including NPF 2, must be based upon the following principles:

- **Environmental justice:** putting people at the heart of decision making, reducing social inequality by upholding environmental justice in the outcomes of decisions;
- **Inter-generational equity:** ensuring current development does not prevent future generations from meeting their own needs;
- **Small country, Small footprint – environmental limits:** ensuring that resources are not irrevocably exhausted or the environment irreversibly damaged. This means, for example, supporting climate protection, protecting and enhancing biodiversity and landscape, reducing harmful emissions, and promoting the sustainable use of natural resources;
- **Adaptation:** supporting climate change adaptation, protecting and enhancing biodiversity and landscape, increasing habitat connectivity and increasing ecosystem functionality to make the natural environment more resilient;
- **Resource conservation:** ensuring that planning decisions require the prudent and sustainable use of finite natural resources;
- **Precautionary approach:** the precautionary principle holds that where the environmental impacts of certain activities or developments are not known, the proposed development should not be carried out;
- **Polluter pays:** ensuring that the full environmental, social and economic costs of development are met by the developer;
- **Proximity principle:** seeking to resolve problems in the present and locally, rather than passing them on to other communities or future generations.<sup>1</sup>

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<sup>1</sup> Taken from or reflecting principles contained within: ‘Choosing Our Future’ 2005, UK Sustainable Development Strategy 1999 and Royal Commission on Environmental Planning 2002.

### 3. Key Issues

Scottish Environment LINK recognises the NPF as a delivery mechanism for a suite of other Executive strategies and policies with a spatial dimension, for example the Sustainable Development Strategy, the Climate Change Programme and the Biodiversity Strategy. While these strategies have been published separately it is worth remembering that climate change is a function of sustainability failure, namely through the anthropocentric abuse of carbon sinks and stores. We note that Appendix A, Table A of the Strategic Environmental Assessment Scoping Report has an extremely useful list of those plans, policies and strategies that affect or may be affected by the NPF. We assume that the NPF will be based upon the most robust baseline data including that available from the National Biodiversity Network (NBN).

The sections below outline some elements which we believe NPF2 may be able to address or help deliver. This is not a comprehensive list and includes a mixture of proposals which may or may not constitute 'national developments'.

### 4. National Development Criteria

The decision to designate an individual development or type of development as a 'national development' clearly brings with it certain advantages over other proposals. In common with others, LINK has spent some time attempting to identify proposals which could or should be designated as 'national developments'. We are aware that the Executive envisages that this type of development will incorporate major strategic transport, water, drainage and waste management infrastructure projects. We recognise that the NPF will establish the need for these projects and that Ministers will make a statement to Parliament on the considerations they will take into account in deciding whether a particular development should be designated as a national development.

Defining 'national developments' by development type is clearly difficult. For example, would all major trunk road upgrades qualify, if so, what would constitute 'major'? Many waste infrastructure projects are made up of a number of smaller proposals – how many would be needed to constitute a national development and could this then apply to other projects made up of a number of smaller, similar proposals working towards a common end?

We therefore recommend that rather than seeking to define national developments by type or size, they are considered against agreed criteria or conditions that could include the following:

#### **National developments must:**

- **Address a proven national need;**
- **Offer identifiable and significant national benefits;**
- **Be of overriding national public interest and/or benefit to the environment;**
- **Offer the Best Practicable Environmental Option;**
- **Contribute to climate change targets as set out in relevant policy and/or legislation; and**
- **Ensure that all practicable steps are taken to mitigate or compensate any adverse impacts.**

We were encouraged during our recent meeting with the NPF team to discuss the possibility that national developments could include environmental projects such as cycle paths, green networks, corridors and stepping stones and we strongly support this.

### **Site-specific 'national developments'?**

We seek reassurance and clarification from the Executive on the matter of how site-specific 'national developments' will be. We are concerned that if developments are highly site-specific then the consent 'in principle' implicit in their inclusion in the NPF will make it difficult to comply with obligations arising from a number of European Directives, in particular the EIA, Habitats and Birds Directives.

We question whether it is possible to consider (a) the principle of, the need for and the location of a project and (b) the details of the project separately. We are concerned that the acceptability or desirability of a project may turn on the details of the proposal. How, for example, would the issue of alternatives or compensation be considered?

### **5. The Ecological Footprint of Scotland**

The 'Ecological Footprint' of Scotland is a measure of the resources we use and waste and pollution we generate. Our current footprint is too large for the planet to sustain. If everyone in the world were to consume natural resources and generate carbon dioxide at our rate, we would need three planets to support us.

The infrastructure in which we live helps determine our environmental impact and the long-term nature of infrastructure gives it a particular importance in the context of a sustainable development. With each project, we bind ourselves to a certain development path.

By setting and integrating an infrastructure framework the NPF therefore has a critical role in supporting a reduction in Scotland's footprint – for example by integrating housing and transport policy. Transport accounts for over 20% of our Ecological Footprint, the location of our homes and the quality and range of transport links therefore have a great impact on influencing the need to travel and resulting impacts of the travel options available. Research has shown that a compact city approach to the development of Aberdeen could reduce the transport footprint by 30% by ensuring short distances between residential areas, working and shopping locations. Similarly in Groningen in the Netherlands a systematic approach to the creation of infrastructure which favours bicycle use, coupled with incorporating environmental criteria in traffic policy has resulted in 66% of all journeys being undertaken by cycling or walking.

Informed by Ecological Footprint analysis the NPF has a critical role in supporting a reduction in Scotland's footprint and positioning Scotland at the leading edge of global initiatives to move towards more secure and more rewarding, low-carbon lifestyles.

### **6. Climate Change and Energy**

Climate Change is happening already, it will get worse and urgent action is needed now to prevent the worst consequences. Scotland's rural, urban, marine and coastal areas are going to be affected by climate change. We must accept this, minimising effects where possible and coming up with strategies which help us adapt. The NPF has the potential to help identify, protect and promote adaptation actions. For example, we must safeguard our carbon reservoirs, particularly peatlands, through improved protection and management of the land. We suggest that greenhouse gas emission reduction needs to be one of the outcomes of the NPF2.

The NPF should address the options for decentralised energy. Could Scotland be a European leader with a decentralised energy network for both electricity and heat generation? Could the NPF promote carbon neutral towns and cities? The NPF should also encourage a strategic approach to grid development – taking into account the findings of the SEA for wave and tidal energy and the proposed SEA for offshore wind.

We recommend that the Executive incorporate the energy hierarchy shown below (and adopted in the draft SEA of the Scottish Climate Change Programme) into NPF2 in order to rationalise the policy approach which planning authorities take. The hierarchy sets out different options for delivering carbon reduction, with those at the top having least risk of adverse social and environmental impact. All elements of the hierarchy must be pursued but capacity should be taken up in the top elements to prevent environmental conflicts when setting targets for those elements lower down the hierarchy. This we feel is helpful in ensuring the Scottish Executive meets its own energy generation and climate change targets without environmental harm and could readily be adopted by local authorities when producing their own strategies and policies.

Energy Measure
Conservation and avoidance energy management systems to control lighting, heating etc
Energy efficiency (including insulation, efficient building design, energy efficient appliances)
Micro-renewables and micro-CHP Household / development scale incl CHP boilers, rooftop turbines, heatpumps, pv, solar thermal etc Heat Electricity
Macro-renewables Community scale wind, biomass, hydro etc Heat Electricity
Macro renewables Commercial scale wind, wave, tidal, biomass – avoiding areas of environmental sensitivity Distributed Generation Grid based Generation

## 7. Transport/Connectivity

Our current patterns of transport are widely recognised as unsustainable. Both road and air transport continue to grow, with 18% more traffic on Scotland’s roads and 90% more air passengers in 2003 than in 1993<sup>2</sup>. Carbon dioxide emissions from transport represent 23 per cent of the UK’s total domestic emissions, and rose by 8 per cent between 1990 and 2003<sup>3</sup>, contributing to climate change.

The health and social consequences of increasing traffic are very severe. The growth in car use means that the average person now walks 66 miles a year less than we did 25 years ago<sup>4</sup>, contributing to physical inactivity and its serious health

<sup>2</sup> <http://www.scotland.gov.uk/stats/bulletins/360/00360-04.asp>

<sup>3</sup> [http://www.dft.gov.uk/stellent/groups/dft\\_about/documents/page/dft\\_about\\_038326-12.hcsp](http://www.dft.gov.uk/stellent/groups/dft_about/documents/page/dft_about_038326-12.hcsp)

<sup>4</sup> National Travel Survey, quoted in House of Commons Health Committee Obesity report, 2004

consequences; two thirds of Scots now fail to take the minimum level of physical activity required for health. Busy roads cause community severance and community safety suffers as fewer people are out and about on the streets on foot and by bicycle.

Encouraging sustainable transport is about more than exhortations to individuals to make more sustainable and healthier choices. What is required is a shift in policies and funding priorities at national and local levels, and in the way we design our communities, to make walking, cycling and public transport more attractive than using the car.

As such the NPF can contribute by promoting/delivering a comprehensive cycle network development and providing more opportunities to cycle safely in an attractive environment, for example off-road cycling/walking routes. We recognise that connectivity is not limited to more effective transport links but can be facilitated by telecommunications, for example broadband provision.

Part of the solution could be the promotion of the compact city approach. Ideally by 2025 cycling and walking will be attractive, everyday options which most people choose for the majority of short trips, not simply for recreation. Services will be provided in ways which minimise the need to travel. Road traffic levels will have been stabilised and Scotland will be served by excellent public transport. Air travel will have stopped expanding.

## **8. Economy**

We hope that NPF2 will seek to implement elements of the Executive's Green Jobs Strategy. We strongly recommend that the overall pattern of economic growth and development is based upon a 'predict and manage' rather than 'predict and provide' model underpinned by the assumption that environmental policies are going to be implemented and work, i.e. reducing travel, reducing waste etc.

## **9. Biodiversity**

The threat of drastic climate change could have a significant impact on ecosystems and landscapes. We would like to see NPF 2 help halt and reverse the loss of biodiversity and ensure it is conserved and enhanced in the longer term. On 15-16 June 2001, the heads of state and government of the EU met at the European Council summit in Gothenburg and committed themselves to halt the loss of biodiversity by 2010, and make this a goal in the European Union Strategy for Sustainable Development. In order to progress this vision there needs to be a clear commitment to:

- Embed biodiversity conservation throughout all government policy development and implementation.
- Protect our finest wildlife sites. The Scottish Executive already has a target to ensure "80% of features cited on SSSIs are in favourable condition by 2008" this should be extended to 100% of features by 2010. Our designated sites are representative of Scotland's outstanding natural heritage and they should be put in a position to be able to adapt and resist accelerated environmental changes. Offshore a network of Marine Protected Areas for marine species and habitats of national importance is urgently needed.
- 'Green' the wider countryside. Scotland's fragmented landscape presents a barrier to the dispersal and persistence of species and habitats. Species and habitats are currently protected in only relatively small and isolated nature

reserves; where appropriate the wider countryside must be able to accommodate species dispersal if Scotland's natural heritage is to be restored and for it to be able to respond to climate change.

These aims reflect Objective 3 of the Scottish Biodiversity Strategy, Landscapes and Ecosystems which is: "To restore and enhance biodiversity in all our urban, rural and marine environments through better planning, design and practice".

Habitat networks, buffer zones and wildlife corridors can facilitate the movement of species in their search for favourable habitats. The NPF could identify, promote and protect these features. The NPF could also stimulate action programmes that reinstate previously fragmented habitats. It is important that the NPF, in taking a spatial approach, clearly states how Scotland will adapt and deal with climate change.

One potentially useful tool has been developed by Forest Research, called BEETLE (Biological and Environmental Evaluation Tools for Landscape Ecology). BEETLE is a suite of tools developed to model and analyse fragmentation and connectivity using GIS. This may be helpful in delivering co-ordinated action for biodiversity at the landscape scale.

## **10. Forestry**

By 2025 we would like to see Scotland's woodlands under sustainable management, improving the quality of life for people, the variety of habitats for wildlife and making a positive contribution to the rural and urban environments through each woodland providing a number of economic, social and environmental benefits.

The Scottish Forestry Strategy sets out a vision to expand woodland cover by 25% in the 21<sup>st</sup> Century and highlights the importance of native woodland habitat. How will this expansion complement other Executive objectives?

The 2<sup>nd</sup> Key Theme in the strategy states its purpose as, amongst other things:

- Promote the use of timber as a renewable, versatile raw material.

The 7<sup>th</sup> Key Theme in the strategy states its purpose as, amongst other things:

- Help to halt the loss of biodiversity, and continue to reverse previous losses, by:
  - Targeted action for woodland and woodland related priority species and habitats; and
  - Broader actions at a landscape/ecosystem scale.

NPF 2 presents an exciting opportunity to deliver co-ordinated action at a landscape scale, which addresses biodiversity, climate, health and landscape objectives. This is to some extent the purpose of Forest Habitat Networks and collaborative woodland creation work across land holdings which has increased landscape scale action and adaptation to climate change.

## **11. Agriculture**

We recognise that the Town and Country Planning legislation does not extend to the production of agricultural crops. However, the production, processing, retailing, and disposal of food all have spatial implications. Is there scope to consider interactions between agricultural policy and NPF2? The Strategy for Scottish Agriculture recognises that local processing and new product development have beneficial

effects by reducing transportation food miles. It is stated that in the absence of the Agriculture Strategy it is likely that:

- Natural and semi-natural habitats will continue to be lost within intensively farmed areas.
- Trends of farmland related species including birds and butterflies will continue to decline.
- High Nature Value farmland and aspects of the historic environment will continue to be degraded or abandoned.
- Current issues regarding intensive agricultural practice and diffuse pollution will be exacerbated.
- Inappropriate land-use change and development could take place leading to additional environmental pressures on water pollution, emissions to air, waste management, soil protection and changes to traditional and managed landscapes.

Can the NPF provide the strategic and spatial guidance that extends across farm boundaries and river catchments to effectively direct the delivery of environmental improvements, landscape-scale approaches and the cooperation required to tackle these issues?

## **12. Water/Flooding**

By 2025 we would like to have sustainable flood management policies that deliver reduction in the damage caused by flooding, ensure protection and enhancement of the environment and act as a sustainable solution to adapting to the impacts of climate change rather than hard engineering solutions. To what extent with the NPF be linked with River Basin Management plans and sub-plans to help deliver sustainable flood management? Will the NPF help identify appropriate areas for managed realignment around our coasts?

Have the implications/obligations of the EU Flooding Directive been considered?

## **13. Marine**

LINK is keen to promote a system of statutory Marine Spatial Planning with proper protection for marine species, habitats and landscapes including a network of Nationally Important Marine Areas (NIMAs) and a Scottish Marine Management Organisation (MMO).

Will NPF2 provide more detail on where our most sensitive areas are, in advance of designation, drawing on the information emerging from the marine SEA processes?

## **14. Strategic Environmental Assessment (SEA)**

We welcome the production of the SEA Scoping report which is well structured and thorough. Our comments relate primarily to the absence of certain aspects. In the summary of environmental objectives (Table 1), under the 'Water' heading no reference is made to the marine environment. The absence of marine, forestry and agriculture is something we query above and which may need to be addressed by the SEA.

In relation to Table 2 the relevant marine PPSs are likely to be: the recommendations of the Advisory Group on Marine and Coastal Strategy (AGMACS) recommendations; a Sustainable Framework for Scottish Sea Fisheries; the Scottish Inshore Fisheries Strategy and the Strategic Framework for Scottish Aquaculture. In addition we suggest that the River Basin Management Planning Strategy for Scotland would be a crucial addition to the 'Water' section of relevant PPSs.

We welcome the Executive's decision to carry out an Appropriate Assessment as required by the Habitats and Birds Directives.

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**On behalf of Scottish Environment LINK**