

SUBMISSION FROM RSPB SCOTLAND

Summary

- In general, we believe the proposed NPF2 is an excellent planning document and has the potential to greatly assist in delivering sustainable development in Scotland.
- We strongly support recognition of the importance of maintaining and investing in the environment to help deliver increasing sustainable economic growth.
- We believe the NPF should go further, and specifically identify the need for landscape scale ecosystem and land management projects to complement/offset impacts of the proposed national developments, as well as historic habitat loss and environmental degradation in central Scotland. Green infrastructure projects will be as essential as the more traditional type of infrastructure projects proposed in NPF2 if we are to achieve the Government's objective of building a Scotland that is wealthier and fairer, greener; safer and stronger; smarter and healthier. This would go further than the Green Network concept, which is nonetheless welcome, by establishing the need for large scale projects like those happening across the rest of the UK and elsewhere in Europe.
- There is a conflict between some of the proposed national developments and Government's climate emissions reduction and renewable energy ambitions. In particular, developments 8 and 9 could establish the need for new coal fired power stations. As proposed, there appears to be no guarantee that Carbon Capture technology would ever need to be installed.

RSPB Scotland

1. The RSPB in Scotland is supported by almost 78,000 members and employs over 200 staff to promote the conservation of birds and biodiversity. Bird populations reflect the health of the planet on which our future depends. Climate change, agricultural intensification, expansion of urban areas, new transport and energy infrastructure and over-exploitation of our seas all pose major threats to birds and biodiversity.

2. Our work includes planning, climate change, energy, marine, water, trade and agriculture issues. We have extensive practical experience of managing land and coast for conservation, farming, forestry and other enterprises. In Scotland, we manage 73 nature reserves totalling some 65,000ha. As well as commenting on national planning issues, our professional planning and conservation staff get involved in the development planning process and we comment on several hundred planning applications annually. In combination with RSPB staff across the UK, and international partners in Birdlife International, we have cross-cutting expertise and experience of land use and sustainability issues within Scotland, the UK, the EU and internationally.

3. We are often most visible when opposing damaging development proposals. However, we object to only a very small minority of the cases we get involved with. We have helped deliver substantial environmental improvements across Scotland and the UK through our positive engagement with individual planning cases and by assisting in the development of positive planning policies.

Background to the NPF

4. RSPB Scotland worked closely with the Scottish Executive and the Scottish Parliament to help inform the development of the Planning etc. (Scotland) Act 2006. We have been long-term advocates of the National Planning Framework (NPF) and from our experience of working with the planning system over many years, we believe a national spatial context is an

essential component of any public policy framework that aims to deliver sustainable economic activity.

General Comments

5. NPF2 provides an excellent description of where Scotland is in 2009 and what we want Scotland to be like in 2030. We are also largely supportive of the spatial strategy it sets out. We particularly welcome recognition that the environment is one of Scotland’s chief assets and that economic development must be closely integrated with promotion of environmental quality and sustainable management of our environment. However, we believe the NPF should specifically identify the need for landscape scale ecosystem and land management projects to complement and help offset the negative impacts of the proposed national developments, as well as historic habitat loss and environmental degradation. There is a particular need to address this in central Scotland. These green infrastructure projects will be as essential as the more traditional type of infrastructure projects proposed in the NPF if we are to achieve the Government’s objective of building a Scotland that is wealthier and fairer, greener; safer and stronger; smarter and healthier. The Green Network concept is welcome but the NPF should be more ambitious. Large-scale projects are happening across the rest of the UK and elsewhere in Europe.

Existing large scale habit projects in the UK	
South Wales- Newport Wetlands Reserve	<ul style="list-style-type: none"> • 439ha site as compensation for habitat lost to Cardiff Bay Barrage • Countryside Council for Wales, Newport City Council & RSPB Partnership • 50,000+ visitors expected p.a.
Humberide– Alkburgh Flats	<ul style="list-style-type: none"> • 370ha of intertidal and other habitats created by the Environment Agency • £6.1m project resulting in £23.6m environmental and flood defence benefits
South Yorkshire- Dearne Valley	<ul style="list-style-type: none"> • restoration of network of sites to create high quality natural habitats • significantly improving area’s image and appeal to new residents, businesses and visitors
Teesside- Saltholme	<ul style="list-style-type: none"> • 380ha former industrial site • will open as RSPB reserve in 2009 with 100,000 visitors p.a. expected • aims to help attract highly skilled, creative individuals to the area • substantial funding from Regional Development Agency - One North East
South East England- Wallasea Island	<ul style="list-style-type: none"> • RSPB managed project • restoration of 620ha of land back to coastal marshland • adjacent to 115ha DEFRA funded port-development compensation project
Thames Gateway- Rainham	<ul style="list-style-type: none"> • 353ha RSPB reserve • former MOD firing range • major greenspace for the Thames Gateway

6. Other projects of similar and larger scale are happening elsewhere in the UK and across Europe. As an indicator of the scale of these projects, Holyrood Park covers an area of about 260ha. There are no comparable projects in central Scotland.

7. Large scale habitat creation projects can deliver benefits for biodiversity but they can also deliver many other benefits, including:

- Climate change mitigation
- Flood alleviation
- Recreational opportunities
- Health improvement
- Quality of life improvements
- Image improvements
- Increased tourism
- Encouragement of inward investment
- Increased sustainable economic growth
- Delivery of legislative requirements relating to:
 - Nature Conservation (Scotland) Act Biodiversity duty
 - Birds and Habitats Directives compensation/mitigation
 - Water Framework Directive objectives

8. The proposed NPF2 sets a good context but should go further. Paragraph 48 of the proposed NPF recognises that the environment is one of Scotland's chief assets and a source of natural capital that can drive broad-based sustainable economic growth. We believe that the NPF should establish the national need to invest in that asset by delivering landscape scale ecosystem and land management projects. Our recent publication, *Nature and Sustainable Growth*¹, provides more information and the topic will be discussed in more detail at a conference on 2nd February².

9. Sites suitable for delivering landscape scale habitat restoration projects exist but are limited, particularly in central Scotland, and could be lost to competing uses if not safeguarded. Our experience from working on estuaries elsewhere in the UK suggests that competition for land can become fierce when in demand for development, habitat creation and flood alleviation.

10. Paragraph 103 sets out how the Government has indicated that major transport, energy and environmental infrastructure projects may be considered as national developments. The proposed NPF identifies 12 national developments. None of the 12 could reasonably be considered to be "environmental infrastructure" projects. All the proposals have the potential to impact on the natural environment and at least eight of the proposals have the potential to adversely impact on nationally or internationally important nature conservation sites. Map 10 in the proposed framework illustrates that most of the developments will be clustered around the Firths of Forth and Clyde. The Firths are already under intensive development pressure and the additional direct and cumulative impacts that will be created by the national developments will require substantial mitigation and compensatory habitat creation to avoid further deterioration of the central Scotland environment and to comply with European and Scots law. For example, on the Forth, we already know that Scottish Power's existing proposal to extend the lifespan of Longannet power station could result in the loss of an additional 1km² of intertidal habitat designated as an SPA under the European Birds Directive. On the Clyde, current proposals for a new powerstation at Hunterston would involve a very significant loss of intertidal habitat from the Portnencross SSSI.

¹ http://www.rspb.org.uk/Images/NatureandSustainableGrowth1_tcm9-191730.pdf

² <http://www.rspb.org.uk/news/details.asp?id=tcm:9-207097>

11. We believe that the need to identify and safeguard appropriate sites is therefore becoming urgent. We believe that the limited opportunities available include sites in the central Forth around the Kincardine bridge; the upper Forth from Stirling to Flanders Moss; Gartloch Pools in east Glasgow; and sites associated with the Commonwealth Games Legacy.

Climate Change

12. The significant greenhouse gas emissions that would result from the air, road and power generation projects proposed is a major concern. We are not aware of any robust assessment having been made by the Scottish Government on the greenhouse gas implications of the proposed airport and power developments compared with the positive greenhouse gas reduction benefits of other projects. Our understanding is that the huge significance of new coal fired generation without carbon capture and storage, the principle of which would be established by the proposed NPF2, would far outweigh any benefits from renewable energy and public transport enhancement. Government is committed to delivering at least an 80% reduction in greenhouse gases by 2050. Additional projects with significant greenhouse gas implications would seriously affect ability to meet climate change targets.

13. The NPF suggests there is a national need for new non-nuclear baseload but does not demonstrate this is the case or that it must be provided at existing power station sites. Consideration needs to be given to the opportunities for reducing baseload requirement. The NPF discussion draft (para 231) set out Government's intention to facilitate a more dispersed pattern of energy generation as a response to the climate change challenge. Before determining the national need for new centralised fossil fuel power plants, some assessment must be undertaken of the baseload requirements in a scenario that takes maximum advantage of distributed generation, renewable energy, energy efficiency and demand reduction opportunities.

14. We would argue that better alternatives could include:

- Technologies designed to keep carbon dioxide emissions below 350g/KWh - the level of a super efficient gas turbine with waste heat capture. This has been adopted in California as a minimum CO₂ emissions performance standard for new power plant investments³.
- Increased use of distributed generation.
- Use of a range of renewables technologies and energy storage, which in combination, reduce the need for baseload from fossil fuel plant.

15. Although NPF2 would allow for carbon capture and storage (CCS) technology, CCS has not yet been proven at scale on an integrated power plant and it may prove not to be technically or economically feasible. We believe that NPF2, as currently proposed, would allow the construction of new unabated coal fired power stations with no guarantees that CCS would ever be required. Building "capture ready" but unabated stations now would impose unacceptable risks to our climate change commitments. NPF2 should be amended to ensure that this would not be facilitated by the approved NPF.

- **Do the policies set out in the NPF2 support the Government's key aims for the development of Scotland to 2030?**

16. Generally yes. However, there are two obvious conflicts. Firstly, the national developments proposed could result in significant adverse impacts on Scotland's natural

³ The detail on how California is delivering the standard can be found at: http://docs.cpuc.ca.gov/published/FINAL_DECISION/64074.htm

environment. The NPF should make it clear that these impacts need to be avoided where possible. To address any adverse impacts that cannot be avoided and to improve existing degraded landscapes the NPF needs to more specifically identify the national need for landscape scale habit recreation projects. Secondly, it is difficult to envisage how the national developments proposed can be reconciled with the need to reduce greenhouse gas emissions. We appreciate that these tensions are recognised in the NPF and highlight inherent conflicts in government policy as much as a weakness with the NPF. Nonetheless, we do not believe that the national need for new unabated coal power plants, airport enhancements or an additional forth crossing has been adequately established or alternatives thoroughly explored.

- **Has the correct balance has been struck between economic development and environmental protection?**

17. RSPB Scotland will continue to promote environmental protection and vigorously oppose development proposals that would damage Scotland's environmental assets. However, we believe this question is misleading as the economy is inextricably linked to the environment. It is not a simple case of balancing competing interests. Economic development and increasing sustainable economic growth will require the protection of Scotland's environmental assets. But it will also require us to go further and build on our existing environmental assets by enhancing our degraded landscapes. The proposed NPF appears to recognise the link between economic development and environmental protection. Paragraph 48 states: "*Sustainable economic and social development depend on healthy terrestrial and marine environments.*" However, we believe the NPF should go further and specifically identify the national need for landscape scale environmental enhancement projects to help deliver sustainable economic growth.

18. We have no additional specific comments to make in response to the other questions posed by the Committee.