

SUBMISSION FROM SCOTTISH NATURAL HERITAGE

General

1. SNH attaches great weight to the role of planning in pursuing the Scottish Government's central purpose of sustainable economic growth. It sees the planning system as having a crucial role in reconciling the economic, social and environmental objectives embodied in this goal.
2. SNH regards the National Planning Framework as fundamental in guiding the way in which the planning system performs this role. It sees its significance in this regard as even more critical than its function in identifying specific developments of national importance. It thus greatly welcomes the attempt in the **Scotland 2030** section of the document to lay down the broad outlines of a development strategy for the country which reflects the duty placed on Ministers in the relevant legislation to contribute to sustainable development.
3. Within this section of the proposed framework we welcome the inclusion of "protecting and enhancing the quality of the natural and built environment" amongst the four key aims of the strategy. We are also delighted to see the firm statement that "growth should benefit the whole of society and should not come at the expense of our environment". Perhaps still more important is the recognition in paragraph 48 of the document that "Sustainable economic and social development depend on a healthy terrestrial and marine environment".
4. SNH wholeheartedly endorses the immediately following assertion that "Realising the vision... will require a strong commitment to protecting and enhancing the natural, built and cultural environments, which are essential components of our quality of life and unique economic assets". We would like to particularly underline this last point: in the modern world the quality of surroundings on offer is one of the key determinants of economic advantage, with areas able to offer such environmental quality being better placed to compete for mobile talent and capital. As the document points out, Scotland possesses such assets in abundance – and not just in the regions that are most widely known for the quality of their scenery and richness of their wildlife. SNH is committed to play its part in making the most of the potential, both economic and social, that they represent.
5. SNH also welcomes the emphasis that the proposed Framework lays upon the importance of place, and its acknowledgement that this is just as great in rural as in urban areas. It regards successful place-making, whether at the national or local scale, as one of the keys to a future in which people are genuinely better off, in the full sense of that word. The theme of distinctive identity, brought out in paragraph 49 of the document, is one that SNH sees as central to this ambition, although we would have liked to see this elaborated a little by reference to its physical expression in the diverse natural and built environments across Scotland.
6. Similarly, SNH is very pleased to find such extensive references to the scope for improving current environmental quality, especially (though not exclusively) in and around urban areas. Particularly relevant here are the references to the value of green networks in general and to the Central Belt Green Network in particular (for example in paragraph 94).
7. Other messages within the proposed Framework that SNH would like to single out for endorsement are:

- the commitment to reducing regional disparities in environmental quality made in paragraph 60;
 - the acknowledgement that it will be important to manage woodland expansion so as not to reduce other environmental benefits (paragraph 93);
 - the stress laid on the need for care in managing landscape change and the reaffirmation of the importance of landscape and visual impacts in decision making, and in particular the recognition of the significance of the cumulative effects of small-scale changes (paragraphs 96-99);
 - the acknowledgement of the psychological and spiritual benefits to be derived from areas of a wild land character and the consequent need to safeguard the qualities on which they depend (paragraph 98);
 - the recognition of the value of peatlands as a carbon store (paragraph 70); and
 - the identification as a key challenge of the need to break the link between economic growth, increased traffic and increased emissions (paragraph 106).
8. Points that are partially developed or to some extent implied in the present document but which we would ideally like to see spelt out more clearly are:
- the desirability of maintaining regional distinctiveness;
 - the need for quality in development – both in choice of site and quality of materials and design; and
 - the low levels of noise and light pollution characteristic of much of Scotland and the extent to which these constitute an asset which the country should seek to preserve.
9. Along with other statutory consultees SNH had a substantial opportunity to contribute to the preparation of the current document, for which it is grateful. Many of the above observations are elaborated in the comments that it submitted in its response to the Discussion Draft, dated 14 April and in its associated responses to the Environmental Report and Supplementary Assessment (15 April and 21 October). It is worth stating that SNH was impressed by the effort that the Scottish Government made to submit the emerging Framework and Strategic Environmental Assessment.

National Developments

10. The addition to the list of projects contained in the Discussion Draft of further airport expansion schemes and of a coal-fired power station highlight the dilemmas faced in seeking to reconcile economic and climate change objectives. These remain despite the emphasis given to public transport access to airports and to clean coal and carbon capture technologies.
11. The issues raised by these tensions go well beyond SNH's sphere of competence and expertise. But the success of the Framework in guiding the planning system to facilitate sustainable development will inevitably be judged partly by how it strikes the balance involved. As regards possible impacts on the natural heritage, we are keen to see the relatively low level of carbon emissions currently associated with Scotland's electricity generation maintained and indeed reduced further. If the net result of new

coal-fired generation capacity were to raise it, there could undoubtedly be adverse consequences for the natural heritage, as for other interests.

12. For the generality of national developments we note that the “matters to be addressed” will be tackled through the normal development management process, including environmental assessment and consideration of environmental mitigation. In general, the identified “matters to be addressed” adequately encompass the relevant natural heritage issues, although we have a couple of detailed comments in relation to the projects at Hunterston and those relating to the Firth of Forth, including the additional projects at Longannet and Cockerzie.
13. At Hunterston the extent of any effect on the Site of Special Scientific Interest is dependent on the overall scale of development. The Committee may wish to know that SNH has written to the potential developers and consultants setting out how we would engage with them in the event of Hunterston’s inclusion in NPF2).
14. Several of the proposed projects - Projects 9 (Extended power station capacity at Longannet and Cockerzie), 1 (Forth Crossing), 3 (Edinburgh airport), 4 (Grangemouth Freight Hub) and 5 (Rosyth Container Terminal) - lie around the margins of the Firth of Forth. This means that they are all close to, and could affect, sites of recognised international importance for birds and other wildlife on natural habitats. This means they are likely to be subject to appropriate assessment under the European Habitats Directive. These Assessments ought to include consideration of any cumulative impacts with other developments in or affecting the Firth of Forth, including other designated national developments. We suggest amending the relevant text within the NPF to recognise this requirement.

Specific questions

SNH’s responses to the specific questions posed by the Committee are as follows:

Whether the policies set out in the NPF 2 support the Government’s key aims for the development of Scotland to 2030.

Yes, broadly they do.

. Whether the correct balance has been struck between economic development and environmental protection.

Broadly, yes. We suggested in our comments on the Discussion Draft that there was scope for confusion over the use of terms such as sustainable or sustained (economic) development or growth. We welcome the strong steer that the proposed Framework provides as to the importance of Scotland’s environment, wildlife, landscapes and greenspace.

It will be important to consider the implications of the collective or cumulative effect of the range of individual projects for Government’s environmental commitments. A particular issue here will be the impact of the National Developments, in combination and in the context of existing and other proposed development, on the conservation of the internationally important environmental asset that is the Firth of Forth.

Whether the proposals listed as national developments meet the criteria set out by Ministers in a statement to Parliament on 13 September 2007.

We agree that all the projects appear to satisfy at least one of the criteria. There are however unresolved tensions, notably in the extent to which decreased road transport emissions in and around the airports are likely to offset increased aviation emissions from the overall package of airport expansion proposals. Similarly, it is unclear how far clean

coal and carbon capture technologies will be able to counter the increase in carbon emissions from continued and increased coal fired power generation.

The key priorities for regional development set out in the spatial perspectives section.

Yes. We especially welcome the prominence accorded to the Central Scotland Green Network.

The potential impact on local authority development planning and development management.

In our view, the enhanced status and extended content of the NPF will be extremely valuable to both the development plan and development management functions of Planning Authorities. We suggest that the precise nature of the Action Programme will be of considerable importance in determining the extent of this value.

Any financial implications for local authority planning departments

No comment.