

## SUBMISSION FROM SCOTTISH WILDLIFE TRUST

Written evidence in response to the “*National Planning Framework 2 - call for evidence*” from Scottish Wildlife Trust (SWT) (January 2009).

SWT welcomes the opportunity to contribute to the development of National Planning Framework 2 (NPF2) and commends the NPF2 team on what has been an open and constructive consultation. In addition to this written response, we have also made direct representations through meetings with the NPF2 team, through contributions to one of the public consultation events and through our representation on the Scottish Environment LINK Planning Policy Taskforce.

The Scottish Wildlife Trust was founded in 1964 to take all appropriate measures to conserve the fauna, flora and all objects of natural history in trust throughout Scotland. With 30,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 124 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

In responding to NPF2-*call for evidence* we will focus our comments on concerns specifically relating to the SWT’s main areas of interest that we feel have not been sufficiently covered by the proposed document or by the Scottish Environment Link Planning Policy Response (to which we contributed). As a general point however, it is important to say that there is a great deal in the document we support and overall we feel it is well drafted.

### **Strategic Issues**

Whilst the original NPF2 discussion draft referred to ‘*eight key elements*’ (page 87) to be addressed in the action programme, we note that they have been removed from the NPF2 proposed framework. Because of their importance we recommend their reinstatement under the section *Action Programme*.

We support the four key aims of the strategy for Scotland’s spatial development outlined in paragraph 43, which reflect the Scottish Government’s (SG) wider strategic objectives, but would recommend the accompanying text in paragraph 48 (*A Greener Scotland section*) makes a stronger connection between a healthy, productive natural environment, sustainable economic growth and people’s quality of life. SWT believes that a healthy environment is the foundation, indeed a prerequisite, for a healthy, wealthy and positive Scotland.

*Climate change adaptation and the ecosystem approach*

It is now widely accepted that climate change will have severe impacts on Scotland's natural environment, economy and society.<sup>1</sup> As such, we are pleased to note the inclusion of Climate Change in the *Key Challenges section* as well as the many references made to the impacts of climate change throughout the text.

In order to tackle the impacts of climate change, action must be taken at all levels in the planning system and it is vitally important NPF2 provides both a strategic steer and some tangible solutions to climate change adaptation. We believe the overarching aim of climate change adaptation policy must be to *'ensure networks of healthy, resilient ecosystems supporting expanding communities of native species across rural, urban and marine environments'*<sup>2</sup>. By taking an ecosystem approach we can begin to rebuild the functional connections within ecosystems, make them ecologically resilient and thereby ensure they continue to provide the ecosystem services on which our economy and ultimately our societies and way of life depend. These services, which we recommend the document make reference to, have been usefully divided into four categories by the Millennium Ecosystem Assessment<sup>3</sup>:

- *Supporting services* - the services that are necessary for the production of all other ecosystem services including soil formation, photosynthesis, nutrient and water cycling;
- *Provisioning services* - the products obtained from ecosystems, including food, fibre, fuel, genetic resources, biochemicals, natural medicines, pharmaceuticals, ornamental resources and fresh water;
- *Regulating services* - the benefits obtained from the regulation of ecosystem processes, including air quality regulation, climate regulation, water regulation, erosion regulation, water purification, disease regulation, pest regulation, pollination, natural hazard regulation; and
- *Cultural services* - the non-material benefits people obtain from ecosystems through spiritual enrichment, cognitive development, reflection, recreation and aesthetic experiences – thereby taking account of landscape values.

## **Specific issues and comments on the text**

### Designated sites and Local Nature Conservation Sites

Whilst the original NPF2 discussion draft referred to *planning having an important role to play in managing the environment by protecting sites designated for nature conservation* (paraphrased sentence in paragraph 146), we note this text has now been removed from paragraph 48 (section *A Greener Scotland*). We recommend the restatement of this sentence (which emphasises the role of the planning system safeguarding the environment) as well as the inclusion of reference to local nature conservation sites (LNCSs). It is important that NPF2 provides a positive steer to local authorities on the value of such sites. They can be just as important as formally designated sites in conserving biodiversity at the all important regional level. LNCSs, together with designated sites and other biodiversity hotspots such as UK BAP priority habitat types should ideally form the 'key nodes' in wider, increasingly connected habitat networks.

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<sup>1</sup> See for example Climate Change: consultation on proposals for a Scottish Climate Change Bill. Scottish Government, January 2008.

<sup>2</sup> Natural Connections: a vision for rebuilding Scotland's wildlife. SWT October 2006.

<sup>3</sup> See <http://www.millenniumassessment.org/en/index.aspx>

### *Development Strategy Section*

We support the main elements as bulleted in paragraph 52, particularly those on climate change, natural and cultural heritage. We would make two suggestions to improve the text under this section. Firstly, that sustainable transport is not just about mode of use and volume of traffic – the design of new infrastructure is also an important element of sustainability. We would like to see any new transport infrastructure incorporate designs which facilitate habitat connectivity (through for example the construction of strategically located ecoducts<sup>4</sup> and mammal tunnels) and create good quality new semi-natural habitat along transport corridors which link into existing green/habitat networks. Secondly with reference to the SG's vision of "*a housing system which delivers more houses.....*" (paragraph 72), we think it is important to define 'higher environmental standards' and suggest a mention of the design of these new homes being greener (in terms of their contribution to enhancing biodiversity and sustainable urban drainage) and cleaner (in terms of their contribution to carbon emissions reductions and pollution more generally).

### *The Cities and their Regions Section*

Paragraph 54 would benefit from a definition of environmental quality (possibly for inclusion in the Glossary). In paragraph 55 we strongly support the reference to developing green networks and the range of "*social, health and environmental benefits*" this will bring. It would be worth making specific reference here to the contribution green networks will make to delivering UK, Scotland and local Biodiversity Action Plan targets and the Scottish Biodiversity Strategy - both of which are Government commitments and underpinned by Part 1 Sections 1 and 2 of the Nature Conservation (Scotland) Act 2004.

### *Sustainable Growth Section*

Paragraph 61 makes reference to the economic and other benefits Scotland can derive from "high quality natural surroundings". Social and economic trends would suggest that the 'natural capital' of Scotland could become increasingly important in the future and therefore needs careful management and where appropriate, strict protection. For example, the trend towards recreation in 'wild land' areas could see ever greater inflows of tourism revenue into rural areas as could remote workers moving into these areas largely due to their landscape and natural heritage value. Again, we make the point that one of Scotland's principal assets is its natural environment and NPF2 should perhaps put greater emphasis on the importance of protecting and enhancing this asset.

There have been attempts at branding Scotland in the past ("Scotland the best small country in the world") but SWT feels these have not always played to our obvious strengths. One of the great advantages that Scotland has over England and many other European countries is its (potentially) spectacular environment. The Government stands at a crossroads - there is a real opportunity to make Scotland a leader and champion of sustainability and environmental stewardship in Europe and NPF2 has a major role to play in fostering this emerging brand. Not only will this re-vamp Scotland's 'brand identity' and international reputation (no more 'sick man of Europe'), but it could be the key catalyst required for growing a sustainable economy, tackling social issues and combating climate change.

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<sup>4</sup> See [http://www.eurosite-nature.org/IMG/pdf/051\\_ecoducts\\_natuurmonumenten.pdf](http://www.eurosite-nature.org/IMG/pdf/051_ecoducts_natuurmonumenten.pdf) for a fact sheet.

### *Built Environment Section*

We strongly support reference in paragraph 78 on the need for greater energy efficiency including tightening building standards and decentralised energy systems. We also support the promotion of “high density, compact cities” as one important response to climate change – however, this must not be at the expense of quality greenspaces and networks which are vital for the liveability of our towns and cities, the physical and mental well being of urban people and the biodiversity of urban areas.

### *Greening the Environment Section*

We support reference in paragraph 91 to “*increasing biodiversity through the development of green networks*” and the value of vacant, derelict and even contaminated land for natural heritage. It might be worth stressing that post-industrial and similar land, if interpreted proactively and managed (often inexpensively with a light touch), can be transformed from being perceived as ‘waste ground’, to areas highly valued by the local community as thriving natural greenspaces. SWT manages such transformed sites, for example the Jupiter Urban Wildlife Centre<sup>5</sup> in the heart of industrial Grangemouth.

### *Flooding and Water Resource Management Section*

We welcome the emphasis on sustainable catchment management (SCM) in paragraph 178. You might like to expand the text slightly here to include SCM as a way of helping safeguard ecosystem services and contributing to the National Ecological Network (NEN), for example through better quality ‘blue networks’ (freshwater systems) as well as green/habitat networks, particularly through riparian woodland restoration and creation. Reference to Sustainable Urban Drainage Systems would also be useful.

### *Making it happen Section*

We strongly suggest the reinstatement of the eight key elements (see above) which were bulleted in paragraph 299 of the original NPF2 discussion draft. As such, we would support the inclusion of both the Central Belt Green Network and national habitat networks as part of the eight key elements. (although we suggest slightly different terminology: we recommend using the term National Ecological Network [NEN] for the reason that the term ‘ecological’ is broader, and encompasses the flow of genetic material, species and communities of species as well as the functional connectedness of habitats). We look forward to working with the NPF2 team, others in the Planning and Built Environment Directorate, relevant Government agencies and LINK member bodies in developing the concept and delivery of the NEN, including actions in the action programme.

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<sup>5</sup> See [http://www.swt.org.uk/wildlife/popup\\_reserves/east/jupiter.htm](http://www.swt.org.uk/wildlife/popup_reserves/east/jupiter.htm)