

# SUBMISSION FROM SUSTAINABLE DEVELOPMENT COMMISSION FOR SCOTLAND

## 1. Introduction

### a. The Sustainable Development Commission

The Sustainable Development Commission Scotland (SDC) is the Scottish Government's independent advisor on sustainable development. The Commission publish an annual review of the Government's progress on sustainable development and reports to the First Minister of Scotland on key policy areas including planning, transport, energy, the economy, climate change, governance and food. We help government, local authorities and businesses put sustainable development at the heart of what they do. At a UK level the Sustainable Development Commission has 19 Commissioners and a secretariat of 50 staff. There are two Scottish-based Commissioners, Professor Jan Bebbington and Hugh Raven, supported by a secretariat led by Scottish Director Maf Smith. Commissioners and secretariat work with Scottish Government departments and agencies to promote sustainable development. We also work with a range of other organisations, such as the Scottish Sustainable Development Forum and the Sustainable Scotland Network.

### b. Defining Sustainable Development

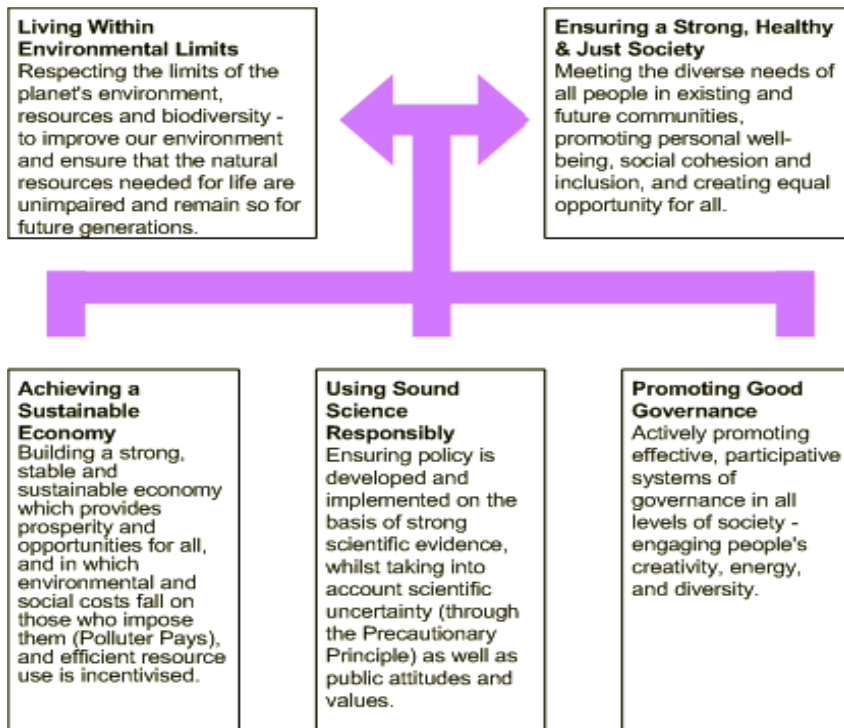
The Commission supports the Scottish and UK Governments' definition of sustainable development as being based on 5 principles (overleaf). Two of these five principles represent the desired outcomes of policy action, namely that we should:

- Live within environmental limits
- Ensure a strong, health and just society

Three of the principles are mechanisms to help achieve these two ends, namely

- Achieve a sustainable economy
- Use sound science responsibly
- Good governance

We regard planning policy as essential to the delivery of a more sustainable Scotland. Scottish planning policy should therefore be aligned with the 5 principles and have as its core aims the creation of a socially, economically and environmentally sustainable country.



**Figure 1:** Scottish and UK Government's shared framework: principles for sustainable development (Source: *Choosing Our Future: Scotland's Sustainable Development Strategy*, December 2005)

## 2. Planning and Sustainable Development

As noted above, the Commission regards planning policy as fundamental to the delivery of a more sustainable Scotland. In our recently published assessment of progress by the Scottish Government on sustainable development<sup>1</sup> we identified the creation of a sustainable approach to planning and infrastructure as one of the 5 key challenges facing Scotland.

The Commission believes that of particular importance in this context is ensuring that all Government strategies and frameworks help contribute to significant reductions in Greenhouse Gas (GHG) emissions as set out in the Scottish Climate Change Bill. This commitment is also embedded in the Government's Economic Strategy and so must underpin both the general approach and the specific developments outlined in the National Planning Framework 2 (NPF2).

Achieving a sustainable approach to planning will require a significant shift from that taken to date at national and local level in Scotland - policies over recent decades have not moved Scotland towards sustainability. Too many communities have been created which are poor in quality and which suffer high rates of crime and social disadvantage; much development has been low density and based around road transport; housing has been developed separately from

places of employment and leisure; and development has been inefficient in its use of energy and resources.

Looking forward it is essential that all future planning decisions in Scotland help moves us to a more socially, environmentally and economically sustainable society. Given the lifespan of most buildings and infrastructure, poor planning decisions taken now will lock Scotland into many more decades of unsustainable development.

### **3. Overall Appraisal of the National Planning Framework**

The Commission believes that the new Framework is set more clearly within the principles of sustainable development than its predecessor. The stated aim of the new Framework, as set out in the Planning etc (Scotland) Act 2006, is to contribute to sustainable development. At a broader scale the Framework is intended to be closely aligned with the Government's Economic Strategy which has a commitment to 'Sustainable Economic Growth' supported by targets and commitments on Solidarity, Equity and Sustainability.

The Commission also welcomes the commitment to long-term planning (to 2030) set out in the Framework. This long term perspective is essential in helping align development to the aims of sustainable development.

We believe that in general the Framework also highlights many of the social and economic challenges facing Scotland. We also welcome the commitment to publish further planning guidance on sustainable development in 2009.

However we do have a significant concern, namely that the infrastructure and transport developments proposed or supported by NPF2 will not contribute towards a lower carbon Scotland.

### **4. Appraisal of National Developments**

The Framework sets out a list of twelve national developments. A broad outline of each of the development proposals is provided in the Annex of the Framework along with a basic appraisal of the contribution of each development to the five Strategic Objectives of Government (Wealthier and Fairer, Smarter, Greener, Safer and Stronger, Healthier) and to a range of other criteria (to contribute to sustainable economic development; help to meet climate change, renewable energy or waste management targets; strengthen global links; etc).

Many of the national developments are of strategic significance and could be expected to deliver economic benefits. However, eight of the twelve projects are likely to lead to significant increases in emissions at a time when, as noted above, the Government is looking to make significant cuts in greenhouse gas emissions.

Of the other four national developments, one is transport related (West of Scotland Strategic Rail Enhancements) and three concerned with energy generation. We address the overall impact of planned transport infrastructure in the next section.

Regarding the proposals for investment in energy infrastructure, we welcome the commitments made to reinforcing the electricity grid, important as they are in exploiting Scotland's renewable energy resources.

We do though have some concerns regarding the proposals for Hunterston and for new non-nuclear baseload capacity. Our primary concern is related to the equating of 'carbon capture readiness' with the actual delivery of low carbon generation capacity.

Carbon capture and storage has great potential to contribute to a lower carbon economy. It is not as yet developed to an extent where it is proven to work effectively and efficiently. Our concern is therefore that new fossil fuel plant could be given approval without any guarantee that it will indeed deliver low carbon energy in the future.

## **5. Transport and the National Planning Framework 2**

The NPF2 includes a section on Transport (page 5) which recognises the high greenhouse gas emissions from the sector and the need to develop an approach to planning and to transport infrastructure that seeks to cut these emissions.

Transport developments feature significantly in the list of national developments, including plans for a replacement Forth Crossing, for Rail Enhancements, for Airport enhancement and for freight infrastructure investment. Also important in assessing the impact of transport infrastructure plans on carbon is the recently published Strategic Transport Projects Review (STPR).

The Commission's concern is that, while there are aspects of the investment programme that are welcome, the overall impact of transport investment plans will be to increase greenhouse gas emissions despite one of the core aims of the National Transport Strategy being to reduce emissions.

The STPR states that the 29 projects outlined would together reduce emissions by 1% by 2020<sup>2</sup>. However, although this is not clearly stated, this is actually only a 1% cut compared to business as usual – in other words it is a 9% increase in emissions. The achievement of the Government's targets for greenhouse gas emission reductions will therefore require far more significant emission cuts to be achieved elsewhere in the economy.

<sup>1</sup> Sustainable Development: A Review of Progress by the Scottish Government (2008)