

**BRIEFING NOTE: National Planning Framework 2
LINK Planning Task Force**



The Scottish Environment LINK Planning Task Force welcomes in broad terms the current reform of the Scottish planning system via the National Planning Framework 2 (NPF2), particularly with respect to providing stronger linkage between planning and sustainable development, as defined by the Brundtland Commission and contained within the ethos of the Planning etc. (Scotland) Act.

The Task Force congratulate the Scottish Government for the realisation that growth "*should not come at the expense of our environment*". However, the NPF2 contains little information on how this will be achieved. It is considered that too much emphasis is placed upon short term economic growth rather than taking forward sustainable development principles which will ensure a viable and robust economy that protects Scotland's natural assets for future generations.

The Taskforce has provided 16 recommendations with regard to improving the delivery of the NPF2 (see below). Within these, there are five key themes. These are:

- Reduction and/or removal of National Developments (particularly roads, airport expansion and unabated coal-fired power stations) which undermine the Climate Change Agenda by causing greenhouse gas emissions or other significant negative environmental impact;
- Improvement of consultation procedures to ensure true community and stakeholder involvement in the consolidation of Scottish Planning Policy (SPP), implementation of NPF2 and Strategic Environmental Assessment of National Developments;
- Recognition that Grid Reinforcement proposals should strive to avoid damage to the sensitive natural and landscape resources of Scotland which are a cornerstone for our local communities and a source of attraction for visitors;
- Acknowledgment that alongside the economic generators of the National Developments there is a need for the creation of wildlife corridors and a Central Scotland Green Network, and;
- Realisation that developments can no longer be seen in isolation and that robust safeguards should be in place to prevent cumulative impacts from damaging our landscape and sensitive ecosystems.

Recommendations

The proposed National Planning Framework would benefit from:

1. A detailed set of Terms of Reference which sets out clearly the duties and responsibilities at both national government and local planning authority levels. The Framework would be further enhanced by inclusion of what is expected from developers and local communities with regard to planning applications;
2. An opportunity for debate and allowing public scrutiny of the NPF2 alongside proposed changes to Scottish Planning Policy Guidance (SPP) which will sit alongside the NPF2;
3. Acknowledgement that proposed National Developments for roads, airport expansion and unabated coal-fired power stations will lead to increased greenhouse gas emissions and potential loss of natural and cultural resources due to “land take”. Greater emphasis should be placed upon public transport related projects, particularly rail, in order to meet the sustainable development principles engendered within the NPF2;
4. Incorporation of principles which integrate delivery of economic progress, social equity and environmental health, thereby leading to the removal of damaging national development proposals which do not contribute to sustainability (e.g. roads, airport expansion and unabated coal-fired power stations);
5. Acknowledgement that Scotland’s environment provides ecosystem services such as natural flood defence, flood storage, water resources, recreational landscapes and soils which support agriculture. With this recognition, the NPF2 should be amended to provide a clear framework on how to safeguard these ecosystem services for our communities and visitors;
6. Widening the focus from merely meeting European and International conservation responsibilities for protecting designated sites to encompass better protection of nationally important sites and the wider Scottish environment. Such a focus would strengthen the recognition of the economic and ecosystem service value of Scotland’s environment;
7. In addition to promoting Transport Corridors, the NPF should be amended to include the equal necessity for environmental protection by ensuring the connectivity between habitats, particularly with respect to allowing species to colonise or migrate via wildlife corridors due to the impact of Climate Change;
8. Recognising the sensitivity of wild land, and the need to protect such areas from the cumulative impacts of multiple developments in areas of high landscape value which have little environmental protection;
9. Incorporating safeguards, as powers are devolved to local planning authorities, to ensure that sustainable development, greenhouse gas emissions and the protection of biodiversity are delivered consistency across Scotland as a whole;

10. Allowing the delivery of planning reform by providing resources to ensure that local planning authorities are able to follow through on planning conditions and enforcement. The NPF 2 should be amended to provide a satisfactory administrative structure to ensure the local planning authorities fulfil their role in the sustainable development of Scotland;
11. Amending NPF2 to take forward the earlier recommendation of the Scotland Rural Development Programme Strategic Environmental Assessment for a *National Renewables Strategy for Scotland which would identify those areas where wind farms, hydropower schemes, biofuel plants (and associated biomass cropping sites), and marine and coastal renewable schemes should be permitted.*”;
12. Widening the NPF2 to include, alongside the National Developments, Landscape Scale Environmental Enhancement Projects to promote sustainability or environmental benefit (possibly linked to ecosystem services- see above). For example using the NPF2 to safeguard and enhance Scotland’s natural carbon sinks and stores (e.g. peatlands, forestry, marshland, estuaries, etc.) as a national resource that could contribute toward combating climate change by providing carbon storage and sequestration;
13. Using the wasted resource of brownfield, vacant and derelict land, particularly where it is in proximity to areas of energy demand, as sites for renewable energy projects. This has the added value of alleviating pressure on green field sites at risk from large scale civil engineering works;
14. Improvement of consultation procedures and reinstatement of third party right of appeal to ensure the involvement of the public and key stakeholder groups. Provision of resources to Local Planning Authorities to encourage active participation of the public, community groups and stakeholders in the planning process;
15. Ensuring that the proposed National Developments have the appropriate level of assessment (including up to a full Environmental Impact Assessment) as the SEA process linked to the NPF2 will be insufficient in ensuring that impacts are identified, eliminated, minimised or compensated, and;
16. Demonstrating clear links and delimiting areas of responsibility, in regard to proposed National Developments in coastal areas in order to avoid overlap and confusion with the forthcoming Marine Bill.

Note: The above briefing note is a summary of the LINK Planning Task Force evidence submission to the Local Government and Communities Committee of the Scottish Parliament. The full text of the submission is available from the committee website: <http://www.scottish.parliament.uk/s3/committees/lgc/inquiries/NPF2/ScotEnviroTaskForce.pdf>

Alternatively, the document can be provided by Richard Hill, convener of the LINK Planning Task Force at: richard@jmt.org