



Sustainable
Development Commission
Scotland

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National Planning Framework Team
Scottish Government
Freepost RRHE-GBSA-BJLR
Planning Directorate
Area 2-H
Victoria Quay
Edinburgh
EH6 6QQ

Dear Sir/Madam

National Planning Framework for Scotland 2 Discussion Draft Response from the Sustainable Development Commission Scotland

The Sustainable Development Commission Scotland welcomes the opportunity to comment on the **National Planning Framework for Scotland 2 Discussion Draft** (referred to hereafter as 'the Framework'). The Commission views effective land use planning as being essential to the delivery of a more economically, socially and environmentally sustainable Scotland. Below we provide our comments on the Framework. These are divided into three sections: an introduction which explains more on the role of the Commission and our position on planning policy; an overall appraisal of the Framework as it stands and; specific comment on the 9 National Developments identified as priorities.

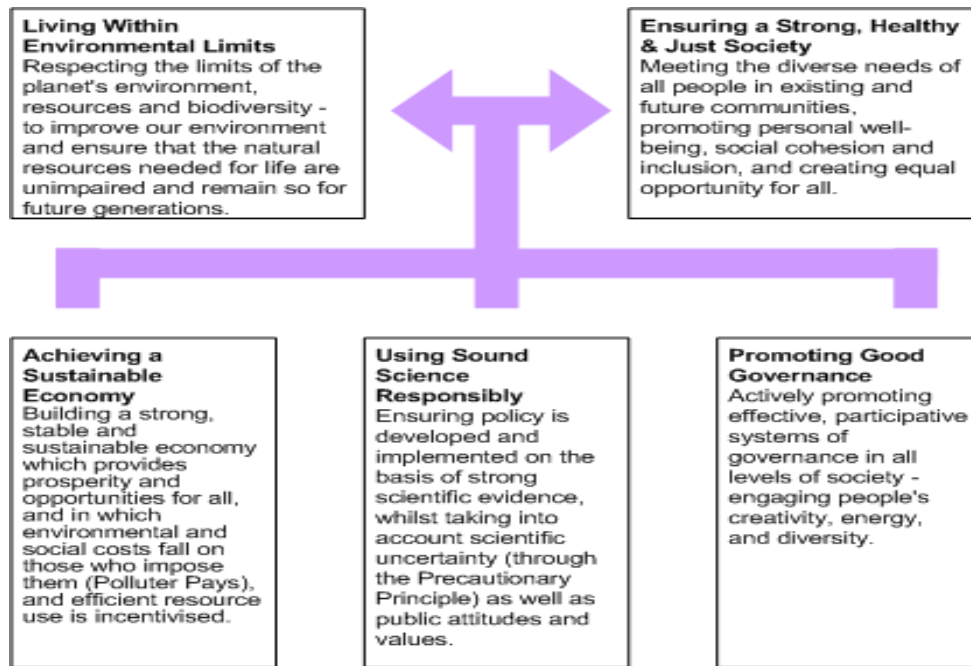
1. Introduction

The Sustainable Development Commission Scotland is the Scottish Government's independent advisory body on sustainable development and a part of the UK wide Commission which has around 50 staff overseen by a Commission of 19 chaired by Jonathon Porritt. The Commission's Scottish secretariat is based in Edinburgh and works with two Scottish Commissioners led by Professor Jan Bebbington of St. Andrews University.

The Commission works closely with the Scottish Government to better integrate the principles of sustainable development into governance structures, strategy and policy. We publish an annual assessment of the Government's progress towards a sustainable Scotland and have also undertaken recent work on topics including Food, Decision Making Tools/Carbon Accounting and Energy from Waste. At a UK wide level the Commission has undertaken a significant amount of work on Planning and Sustainable Development as part of wider work on Sustainable Communities, Energy, Climate Change and Transportation.

The vision for sustainable development adopted by the Commission is that of the Scottish and UK Government's 'five principles' of sustainable development as shown in Figure 1 overleaf. The Commission believes that this model, which is intended to ensure we deliver a healthy and fair society within environmental limits, should form the basis for policy in planning and all other areas of Government.

Figure 1: Scottish and UK Government Sustainable Development Framework
(Source: *Choosing Our Future*)



2. Planning and Sustainable Development

The Commission regards planning policy as fundamental to the delivery of a more sustainable Scotland. However, planning 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.

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 current consultation on a 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 proposals outlined in the National Planning Framework.

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.

In terms of specifics the Commission supports the Framework's recognition of the '*major contemporary challenges of global competition, climate change and resource depletion*' and of the need to move Scotland to a low carbon economy. 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 in 2008 on sustainable development and on Scotland's environmental footprint.

However we wish to highlight two areas where we believe the overall approach taken could be enhanced:

- Firstly, the text on sustainable development refers largely to environmental challenges facing Scotland. The other aspects of sustainable development - economic and social - are addressed but not seen directly as part of a sustainable approach. We would suggest that the introduction to the document clearly set out the Government's five principles of sustainable development (Figure 1). This places discussion on all economic, social and environmental challenges within this context
- Secondly, and more critically, we do not believe that the overall approach to development or many of the specific projects identified within the Framework will help to deliver the Government's commitment to reduce climate change emissions by 80% by 2050. Support for investment in renewable energy infrastructure is welcome and 'carbon positive'. However, many projects (e.g. the significant expansion of the housing stock) will create a significant carbon footprint, limiting the Government's ability to deliver on its carbon target. When the aspirations for economic and population growth are also factored in this challenge becomes greater still.

Recommendations:

- There should be a clear statement at the start of the document that all planning policy is intended to be aligned to the Government's principles of Sustainable Development as set out in *Choosing our Future*
- The Government is committed to developing proper carbon accounting of all public sector programmes and policies. There should be a clear commitment within the Framework to 'carbon account' for all the areas of investment outlined in the Framework whether these are to be delivered by National Government, Local Authorities or other public bodies.

4. National Developments

The Framework sets out a list of nine national developments. A broad outline of each of the nine 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).

While many of the national developments are of strategic significance and could be expected to deliver economic benefits, there again is not a complete alignment with the Government's stated aims on climate change. Eight of the nine 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. Given the expected lifespan of each of these developments it is essential that they do not make achievement of these reductions more difficult. The challenge will therefore be to design the projects in ways which help minimise the carbon impact, with mitigation measures employed to help counteract the negative impact on emissions.

Recommendation:

- Carbon impacts to be included in the statement of needs under 'Matters to be addressed at consent stage'. In line with the Government's commitment to carbon accounting, a full appraisal of the carbon impact of both the construction and operation of each development to be undertaken with this taken forward into clear commitments to ameliorate the negative carbon impact of the developments.

We hope that these comments are useful in preparing a revised version of the Framework. Please do contact me if you require any further information.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Maf Smith', written in a cursive style.

Maf Smith
Director