

Draft Scottish Planning Policy: Sustainability & Planning

Please answer the questions relevant to you and provide further comment, including evidence or justification in the box provided

Responses should focus on the content of the consultation paper. There is no need to repeat comments on other sections of the Draft SPP that was consulted on previously.

| Consultation Question 1 | Y | N |
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| Do you think the SPP should include a presumption in favour of development that contributes to sustainable development? | X | |
| <p>We have ticked yes subject to the following qualifications and caveats</p> <p>We consider that 'sustainable development' is a better presumption than 'sustainable economic growth' because it does not prioritise economic growth over the other two key pillars of sustainability - the environmental and social.</p> <p>However, just giving this term more prominence without elucidation or adequate adjustment of other statements and policies creates more confusion and uncertainty about the respective roles of 'sustainable development' and 'sustainable economic growth':</p> <ul style="list-style-type: none"> • How can development 'contribute' to 'sustainable development' unless it is itself 'sustainable development'? We think it would be clearer to have a simple presumption in favour of sustainable development as opposed to 'development that contributes to unsustainable development', or else explain what the difference is. This also means revising the references to the presumption in paragraphs 8 & 9. • 'Sustainable economic growth' remains dominant. It is central to three paragraphs (2,3,5) describing the "Scottish Government's central purpose", the Government Economic Strategy (2011) and the National Planning Framework. In these three over-arching policy statements it plays a major and explicit role, while the role of 'sustainable development' remains largely implicit, if not subordinate to 'sustainable economic growth'. The Scottish Government's commitment to 'sustainable development' is only "reflected in its | | |

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| <p>purpose", and "reflected in the continued support for the five guiding principles set out in the UK's shared framework for sustainable development".</p> <ul style="list-style-type: none"> • While 'sustainable development' is identified as an objective which the Planning etc. (Scotland) Act 2006 requires the preparation of NPF and local plans to have recourse to, it is unclear how this plays out against the fundamental or overarching requirement for 'sustainable economic growth'. • Presumably part of the motivation behind the notion of 'sustainable development' is a wish to prioritise long term benefit for the whole of society over short term benefit to some in society, but unless the environmental and social strands of sustainability in 'sustainable development' are fleshed out more in SPP and bolstered in other policies, how will they will be able to hold their own against the economic strand? • While 'sustainable development' is a long-established, internationally accepted concept, the Scottish Government's definition of 'sustainable economic growth' was only drafted recently (no date is given) in response to a Parliamentary Question and has no similar status. We fear that the definition of 'sustainable economic growth', as "Building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life too" boils down to "a growing economy...ensuring that future generations can enjoy a better quality of life", which in turn will be interpreted as 'sustained economic growth' - i.e. economic growth above all else. 'Quality of life' needs to be explicitly defined to include more than the economic - and if social and environmental factors were included, then what we have isn't 'sustainable economic growth' but 'sustainable development'. • The most straightforward solution to the problems identified above is for the Scottish Government to drop its focus on 'sustainable economic growth' and instead commit itself wholeheartedly to 'sustainable development'. After all this would not preclude promoting economic growth, as long as that growth goes hand-in-hand with social welfare and environmental protection. | | |
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| Consultation Question 2 | Y | N |
| Do you think the proposed approach to sustainability and planning is appropriate? | | X |

Regarding paragraph 7: We welcome that this **consultation** draft replaces the previous reference to “significant” with “due weight” for the consideration of net economic benefit. We also welcome the inclusion of natural heritage in the list of Policy Principles.

Nevertheless it is noticeable that economic considerations are put first, and comprise the first four or arguably, five bullet points. Planning decisions frequently involve assessing and balancing competing factors, and we remain concerned that while the presumption does not explicitly weight one particular factor above another, the preponderance of economic ones in the list of Policy Principles loads the dice.

The following omissions concern us:

- *communities* - there is nothing about the need to protect communities from damaging or socially divisive development, or to protect the amenity of communities (rather than the amenity of new and existing developments)
- *wildlife and biodiversity* - Policy Principles that headline the "creation of sustainable places across Scotland" should surely show an understanding of these aspects of the natural environment and the threat posed to them by much development
- *cumulative impact* - the notion of protection with regard to cultural and natural heritage is too thin, and ignores the issue of cumulative impact. Many developments will sacrifice this or that bit of cultural or natural heritage on the grounds that in the larger scheme of things, the particular bit is outweighed by the economic or other benefits of the particular development and will not make much difference to the overall amount of remaining cultural and natural heritage. But at some point such incremental nibbling away will be seen to have had a massive collective impact, and we would like to see the protections for cultural and natural heritage (in all its forms) strengthened and clarified. This ought to involve a national quantification of how much cultural and natural heritage the Scottish Government is prepared to see sacrificed by development, or how much should be preserved, as well as caps for certain types of development for which there is no compelling economic or other case that they should be unlimited (for example, wind turbines and wind farms).

In general there is no acknowledgement that optimising

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| environmental (and sometimes social) sustainability may well mean extremely restricted development, or no development at all - and that not developing can also have positive economic impacts. | | |
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Consultation Question 3

In relation to the Equalities Impact Assessment, please tell us about any potential impacts, either positive or negative, you think the proposals in this consultation document may have on any particular groups of people.

Because 'sustainable development' remains, as we argue above, subordinate to 'sustainable economic growth', it will not give suitable protection to those third parties whose interests in developments are social or environmental or indirectly economic, ie. the impact for such groups of people is likely to be negative. Only a consistent and thorough-going deployment of the term 'sustainable development' would allow planning authorities to give proper weight to social and environmental aspects of developments against direct economic ones. Losers - as is already apparent in current wind farm development - are primarily the members of real and imagined rural communities, ie. those who live in, work in or visit the Scottish countryside, and whose economic and non-economic quality of life depends on a countryside unspoilt by industrial development owned by foreign shareholders and offering few, if any, permanent employment opportunities to Scottish people.

Consultation Question 4

In relation to the Equalities Impact Assessment, please tell us about what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

Only if 'sustainable development' were fully implemented and made congruent with other policy, could it advance equality of opportunity, as it has the potential to allow for the economic, social and environmental interests of different groups of people to be considered during the planning process, so preventing the prioritisation of the economic interests of developers. However, according to our reasoning above, the dominance of 'sustainable economic growth' means the planning system will continue to favour the interests of the 'haves' over the

'have-nots' and has little chance of "fostering good relations between different groups". The social division and strife already caused by onshore wind development is a case in point. Community engagement and community benefit do not make up for the fact that rural stakeholders feel ignored and disenfranchised by a planning system which prioritises developers' interests.

Consultation Question 5

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, positive or negative, you think the proposals in this consultation document may have on business.
