

29 March 2016



**Scottish
Wildlife
Trust**

Scottish Wildlife Trust's response to:

Scottish Government's Draft Planning Delivery Advice:
Housing and Infrastructure

General comments

The Scottish Wildlife Trust welcomes the opportunity to provide feedback on the Scottish Government's Draft Planning Delivery Advice on Housing and Infrastructure. The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. We have a 25-year vision for Scotland in which we want to see a network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas.

The Scottish Wildlife Trust believes that inappropriately located and badly designed developments can have significant, detrimental impacts on people's quality of life as well as Scotland's biodiversity. We believe that delivering high quality sustainable places where people want to live can only be achieved by having a robust, well-resourced planning system which recognises that planning is about creating places for communities to flourish as opposed to just building houses.

In general the Trust would like to see this Planning Advice make greater reference to green infrastructure and green networks throughout, as early thought and emphasis on green infrastructure provides the greatest benefits for communities, climate change mitigation, health and wellbeing and the economy.

The Trust is pleased to see the inclusion of the Place Standard within the document, however, it is noted that the Advice stops short of explicitly advocating its use. The Trust would like to see the document explicitly advise the use of the Place Standard.

The Scottish Wildlife Trust would like to see a housing provision planning that places overall human well-being at its centre. However, for this to be properly realised it needs to be recognised that good health and wellbeing are intrinsically linked to access to nature and flourishing biodiversity.

Integrated Green Infrastructure

A definition of green infrastructure should be included within the document, the Trust suggests the one favoured by the European Commission and Scottish Government: *"the use of ecosystems, green spaces and water in strategic land use planning to deliver environmental and quality of life benefits. It includes parks, open spaces, playing fields, woodlands, wetlands, road verges, allotments and private gardens. Green infrastructure can contribute to climate change mitigation and adaptation, natural disaster risk mitigation, protection against flooding and erosion as well as biodiversity conservation."*

It would also be useful to include a description of the effects, both positive and negative, that development can have on ecological coherence across a landscape and the importance of integrated green infrastructure for mitigating negative effects.

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For an example of good practice regarding green infrastructure, which might be useful to include, the Trust would suggest referencing the South Cumbernauld Community Growth Area – Green Networks Guidance produced by the Cumbernauld Living Landscape.¹

The Trust notes the presumption in favour of developing brown field sites, this has obvious benefits. However, these sites often have high benefit for biodiversity, sometimes being the only “island” of habitat in a sea of development. This should be acknowledged within the document and developers made to implement mitigation.

The Trust would like to see explicit reference to the need for early consideration of retained and designed green infrastructure within section 2.

The Trust would like to see impacts on existing green infrastructure added to the list in paragraph 31.

Given that most stakeholders do not currently associate green infrastructure with general infrastructure the Trust would like to see it referenced within the list in paragraph 58.

The list in paragraph 105 should include green infrastructure, as demand and pressure for this resource goes up markedly with increased population.

The Trust are pleased to note the inclusion of green infrastructure within Figure 2 on page 20.

The Trust strongly agrees with paragraph 107, this especially applies to green infrastructure projects.

Climate Change

The Trust is surprised to see no mention of climate change within the entire document despite the vital role that the planning system has in relation to climate change. Indeed the Scottish Government's Second Report on the Proposals and Policies (RPP2)² specifically highlights this: *“The planning system has an important role in promoting sustainable development and can help us adapt to climate change and mitigate its effects...”* *“Scottish Planning Policy, planning advice, and strategic and local development plans all play their parts in supporting the transition to a low carbon future.”*

The Trust would like to see explicit guidance given on adaptation measures in relation to housing, including green infrastructure options, as well as specific guidance on adaptation and mitigation in relation to housing provision.

Transport Hierarchy

Transport is far too often taken to mean the car, a mode hierarchy approach should meet demand via walking, cycling and public transport before considering private car use. The transport hierarchy needs to be stated in Appendix 1 of the document.

An over emphasis on private car use leads to negative externalities across housing developments, making it difficult to “retro-fit” active travel and green networks into developments.

The Land Use Strategy

¹ See:

http://cumbernauldlivinglandscape.org.uk/docs/083_385_southcumbernauldcga_greennetworkguidance_webversion_1446561841.pdf

² See <http://www.gov.scot/Publications/2013/06/6387>

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The Trust notes that the Advice document makes no mention of the Scottish Government's Land Use Strategy³. The Trust believes there should be a stronger link between planning, housing provision and the Land Use Strategy. The Land Use Strategy has three objectives relating to the economy, environment and communities - the three pillars of sustainability and principles for sustainable land use.

The Land Use Strategy is about getting the best from land – so that land use delivers multiple benefits. When local development plans are being drawn up, applying the principles of the Land Use Strategy would help determine where development, including housing, should and should not occur. It concerns mapping opportunities and constraints (in terms of ecosystem services) within a landscape/catchment/local authority to deliver the maximum benefits for people whilst still protecting and enhancing natural capital. The LUS applies the ecosystem approach⁴ which is about placing people at the heart of decisions relating to the land.

The principles behind the Land Use Strategy support a plan-led system.

Two pilot studies have been conducted involving Scottish Borders Local Authority and Aberdeenshire Local Authority. The Trust believes the ecosystem services mapping should help inform the next local development plans and guide future investment relating to natural capital.

Delivery of high quality development

The planning system is currently plan-led and should remain so. As referenced in the Advice, Scotland has good planning policies which are laid out in documents such as National Planning Framework, Scottish Planning Policy (SPP), Creating Places, Planning Advice Notes and Circulars.

However, these policies do not always translate into high quality sustainable developments on the ground. Or indeed realise the Scottish Government's four strategic outcomes of the planning system. For a more detailed response to this section please see Scottish Wildlife Trusts Response to the Independent Review of Planning⁵.

The Natural Capital Standard for Green Infrastructure

To address the inconsistency in quality of green infrastructure between developments, the Scottish Wildlife Trust is developing a tool - The Natural Capital Standard for Green Infrastructure - which assesses the quality and quantity of green infrastructure within a specific development, be it new housing, a school, a retail park or an industrial zone. The tool scores the quality of the total green area based on the estimated ecosystem services provided by the types of green infrastructure within the development. For example native trees and shrubs score more highly than non-native (because they deliver a greater range of ecosystem services). Sustainable urban drainage systems which are designed to be attractive to wildlife (and also have high aesthetic appeal) score more than those that are based on hard engineering (due to the greater range of ecosystem services they deliver). Hard surfaces score less because they do not deliver as many ecosystem services as permeable surfaces.

The relative scorings given to each type of green infrastructure can be edited by the planning authority. For example if flooding is a particular issue, extra emphasis may be put on green infrastructure that delivers benefits in terms of flood prevention / alleviation i.e. rain gardens, green roofs, trees and sustainable urban drainage systems.

³ See: <http://www.gov.scot/Topics/Environment/Countryside/Landusestrategy>

⁴ The ecosystems approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

⁵ See: http://scottishwildlifetrust.org.uk/docs/002_433_swtplanningfinaldec2015_1448970133.pdf

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This type of tool has been used by planners in Berlin, Malmo, Seattle and Chicago⁶. In some of these places it is statutory, in others it is not, but developers are incentivised to use it because it helps process their application in the planning system.

The Scottish Wildlife Trust would welcome the opportunity to discuss the applications of the tool with the Scottish Government's Delivery Advice Team. The Trust believes it contributes to the Scottish Government's ambition to deliver high-quality places for Scotland. Because it uses ecosystem services as a weighting factor it helps quantify (in terms of green infrastructure) how a particular development is delivering benefits for people (and wildlife) and integrates with the Place Standard.

Leadership, resources and skills

Because local authorities continue to face substantial cuts to their budgets – the Trust is concerned that there are neither the resources nor the appropriate skills available to support the vision and creation of high quality sustainable housing developments (as outlined in the advice) – places where citizens want to be, allowing communities to flourish. Meaningful community engagement which the Trust would support, is time consuming; how will hard pressed local authorities be encouraged to devote resources to this process and what is the opportunity cost forgone by them doing so? Should the onus be on developers to invest in this type of engagement as opposed to consultation?

The Trust believes strong leadership is needed both within central and local government.

The ultimate goal of planning must be outcomes focussed – as outlined in Scottish Planning Policy. This is unlikely to happen under the present system given the lack of incentives/regulations and variability in interpretation of policy across planning authorities. Under the present system we believe some local authorities are still focussed on delivering buildings and grey infrastructure, rather than high quality places.

The Trust is also concerned that some local authorities have lost biodiversity officers and/or ecologists; some are sharing them and others have no plans to replace them. This means that planning decisions impacting on Scotland's natural capital - in terms of protecting, enhancing or restoring depleted stocks – are not being made by those with the right set of skills. This may impact on a Scottish Government key priority, detailed in the Economic Strategy, which is to: Invest in natural capital, resource efficiency and low carbon.⁷

The Scottish Wildlife Trust would like to be kept informed of the progress of the Planning Delivery Advice on Housing and Infrastructure.

For further information please contact:

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⁶ See: GRaBS Project Website <http://www.grabs-eu.org/>

⁷ See: <http://www.gov.scot/Resource/0047/00472389.pdf>