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8b McDonald Road
Edinburgh
EH7 4LZ



August 26 2010

Dear Sir/Madam,

Re: THE STRATEGIC DEVELOPMENT PLANNING AUTHORITY FOR EDINBURGH AND SOUTH EAST SCOTLAND - MAIN ISSUES REPORT

The Scottish Wildlife Trust (SWT)¹ welcomes the opportunity to comment on the Edinburgh and South East Scotland Main Issues Report (MIR).

The Scottish Wildlife Trust believes that inappropriately located and badly designed developments can have significant, detrimental impacts on Scotland's biodiversity and on people's quality of life too. We believe that the planning and design of new places could and should in the future *enhance* biodiversity, particularly if new developments are designed to improve habitat connectivity and avoid the destruction of valuable biodiversity hotspots (e.g. Local Nature Conservation Sites). To achieve this SWT recommends the application of an ecosystem-based approach² to at least the natural heritage aspects of the planning system.

We believe that our comments, if taken on board in the development of the Local Development Plan, will add value to Edinburgh and South East Scotland's natural heritage and, at the same time, be beneficial to the people of Edinburgh and South East Scotland and the local economy. We have concentrated on the contents and phrasing of the MIR and addressed those questions which are of relevance to the Scottish Wildlife Trust.

SPECIFIC POINTS

Page 12

4.26: Environment: Significant environmental assets also include Local Nature Conservation Sites (LNCSs), as such Local Biodiversity Sites (LBS)³, which form part of LNCS system, should have been shown on Figure 7. LBS should be mapped in the new Strategic Development Plan.

Figure 7 does not show location of designated sites clearly.

Page 13

4.28 states, *inter alia*: the challenge is to ensure that the green belt reinforces a long term spatial planning strategy. Surely this should be stated the other way around such that: a long term spatial strategy reinforces the greenbelt and prevents urban coalescence.

4.29: Should state that the Central Scotland Green Network (CSGN) would be beneficial to wildlife too.

¹ The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 35,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 123 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

² See Hughes J., Brooks S. (2009) Living Landscapes: towards ecosystems-based conservation in Scotland. Scottish Wildlife Trust, Edinburgh

³ Local Nature Conservation Sites are non statutory designated sites that are designated for either their biodiversity or geological value. In Edinburgh and the Borders those of high local biodiversity value are called Local Biodiversity Sites. Previous strategic plans referred to these sites as ecologically significant areas.

Protecting Scotland's wildlife for the future

4.30: The last paragraph should also include protection and restoration of lowland raised bog and blanket bog as a climate change mitigation measure.

4.33: Second paragraph, on 10 March 2010, Scotland's Marine Bill received Royal Assent, making it the Marine (Scotland) Act 2010.

Page 14

4.37: Bullet point 3 states:promote *developments that make a positive contribution to the overall community environment*. The latter point requires clarification, we are unsure as to the exact meaning - does it mean a communities' environment? We would prefer to see wording such as: *Helps to safeguard and enhance important natural and built environmental assets, and promote developments that make a positive contribution to the natural environment and in so doing add value to the local community and people's quality of life.*

Page 16

Question 1:

Do you support the proposed vision for the SESplan area? Do you have any preferred alternatives? What are your reasons for your view?

The Scottish Wildlife Trust would like to see reference to a high quality environment in the Vision. This could be incorporated by replacing 'place' with environment.

Question 2:

Do you support the proposed key aims for the SESplan area?

Whilst we are broadly supportive of the general key aims and are pleased to see bullet point five is a key aim, it should also be recognised that 'growing the economy' can have hidden environmental costs and at times there may be a conflict with the other key aims such as 'encouraging sustainable development' and 'conservation and enhancement of the natural environment.'

Question 3:

Is the preferred approach to the scale of future development, on the basis of the 'market recovery' scenario related to economic growth areas, appropriate? If not, should the SDP identify land sufficient to meet the 'high growth' scenario? Is there another approach that the SDP should follow and if so, why?

It would seem sensible to adopt the 'market recovery approach', however we believe that strategic spatial growth directions (Figure 9 page 18) must be centred around high quality public transport (preferably a rail network). We are concerned that increased growth in the Midlothian Border Corridor without the appropriate rail network in place will result in most commuters opting to travel by private transport – this would be incompatible with the key aims of the Vision (bullet point 4, page 16).

Page 21

7.2: Under Sustainable Development - second paragraph should include consideration of the environment and impacts on biodiversity. (See Scottish Planning Policy [SPP], sections 37 and 39).

Question 4:

Is the preferred approach to sustainable development appropriate? Are there other approaches that the SDP should follow and if so, why?

The Scottish Wildlife Trust is supportive of a 'sustainability' approach to the SDP. This should accord with the five principles of sustainable development as stated in section 35 of SPP.

Page 26

Question 6:

Is the preferred approach to guide development towards accessible locations appropriate? Should the SDP follow another approach and, if so, what and why?

Whilst the Scottish Wildlife Trust agree that transit orientated development should be the way forward, we do not see 'airport enhancement' as contributing towards a sustainable transport system. This is more likely to result in increased greenhouse gas emissions.

To reduce commuting distances, mixed use developments should also be encouraged.

Page 33

Question 10:

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Is the preferred approach to continue to support the redevelopment of brownfield land appropriate? Should the SDP set a target and if so, why? Are there other alternative approaches that the SDP should follow and if so, why?

Whilst development on brownfield land may be appropriate, it should be recognised that such 'neglected' sites are often hotspots for biodiversity and can support local biodiversity action plan species. Therefore, it is important that an environmental assessment is conducted *prior* to the drawing up of a masterplan. By this method, the natural assets of the site can be incorporated into green infrastructure in the design plan.

Page 35

7.80: should reference CSGN - although we acknowledge that this is dealt with separately below. Where the opportunity exists, there should be expansion of the green network to increase functional connectivity between international, national and locally designated sites.

7.84: Important to set this in context of the legislative framework namely, the Nature Conservation (Scotland) Act 2004 and the 'biodiversity duty'. National Development 12 should also be referenced. We would prefer to see the term *environmental impact assessment* rather than 'ecological appraisal'.

Page 36

Question 12: Is the preferred approach to protecting and enhancing South East Scotland's natural heritage and landscapes appropriate? Is there another approach that the SDP should follow and if so, why?

We are broadly supportive of the preferred option with the provisos above.

7.88: A definition of what constitutes a green network would be helpful - a common misconception is that it is just concerned with increased tree coverage.

Question 13:

Is the preferred approach to designating the green network appropriate? Are the opportunities for the development of the green network appropriate? Are there other strategic opportunities which should be identified? Are there other approaches that the SDP should follow and if so, why?

We support the approach, but we would also like to see more emphasis being placed on encouraging new development proposals taking the opportunity (where appropriate) to enhance the green network (e.g. through careful masterplanning). This would encourage developers to adopt an ecosystem approach to development, in that they would have to consider the wider implications of their development on the environment.

Page 37

Figure 13: In the final strategic development plan it would be useful to have a figure of the current and future proposed expansion of the green network rather than just a table.

Page 39

Question 14:

Is the preferred approach to broadly maintaining the Green Belt appropriate? Are there other alternative approaches that the SDP should follow and if so, why?

The green belt should be protected from inappropriate and unsustainable development and any permitted development must only be allowed because of *exceptional circumstances*. Where development of the Green Belt does occur, it must be compensated by habitat creation to replace both, in form, function and connectivity, that which has been lost.

7.103: The first sentence should include the term *sustainable development* rather than stating: *meet criteria on sustainable economic growth, sustainable construction and efficiency are supported*.

Question 15:

Is the preferred approach to controlling development in the countryside appropriate? If not, what approach should the SDP follow and why?

The Scottish Wildlife Trust are broadly supportive of the preferred approach, with the caveat that all proposed development in the countryside should be assessed against SPP guidance on sustainable development.

Protecting Scotland's wildlife for the future

7.109: Extension of the life of existing power stations through 'new non-nuclear energy production', from the outset, must ensure that energy production does not conflict with the greenhouse gas reduction targets set in the Climate Change (Scotland) Act 2009.

Page 41

Question 17:

Is the preferred approach to renewables appropriate? Are there other approaches that the SDP should follow and if so, why?

Renewable energy development must avoid sites where there would be unacceptable modification, loss or fragmentation of important species, habitats or ecosystems. Identification of 'sensitive sites' which are to be avoided is a crucial consideration in determining where future wind farms are to be located.

7.119: The first sentence should also recognise that forests, 'at their best' can also enhance local biodiversity.

Question 18:

Is the preferred approach to forestry appropriate? Are there other approaches that the SDP should follow and if so, why?

The Scottish Wildlife Trust is supportive of increased forestry cover that enhances biodiversity, provides functional connectivity between different habitats, increases the permeability of the landscape to wildlife, adds value to the existing green network and affords increased opportunities for people's enjoyment of nature.

Page 43

7.130: Whilst we welcome the inclusion of the *protection of peatlands* in this section, many of South East Scotland's peatlands have deteriorated through various land use practices and as such, are not locking up carbon. Where opportunities exist, peatlands should be restored as well as protected.

The Scottish Wildlife Trust would like to be kept informed of the progress of the MIR and we would be grateful for the opportunity to comment further if required.

Yours faithfully,

Dr Maggie Keegan
National Planning Co-ordinator