

Chris Sinclair
Scottish Government
Directorate for the Built Environment
2J (South)
Victoria Quay
EDINBURGH
EH6 6QQ

20 June 2012



Dear Mr Sinclair,

RE: CONSULTATION ON DEVELOPMENT DELIVERY 2012

The Scottish Wildlife Trust¹ welcomes the opportunity to comment on Consultation on Development Delivery 2012.

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. We also believe that delivering high quality sustainable places where people want to live can only be achieved by having a robust and well resourced planning system. This would ensure that planning decisions are made by knowledgeable, innovative, confident and competent planners.

We have responded to those questions that are relevant to the Scottish Wildlife Trust's objective to "*advance the conservation of Scotland's biodiversity for the benefit of present and future generations*"

The TOR of the consultation is concerned with current issues and opportunities for facilitating development and infrastructure provision. We note that green infrastructure has not been included in 'infrastructure provision'; we believe that this type of environmental infrastructure should be included in the second consultation and is essential for the delivery of sustainable development. The importance of green infrastructure is recognised in the EU Biodiversity Strategy to 2020² which has an action to promote European green infrastructure this section also highlights that: building green infrastructure can help overcome many of the environmental challenges faced in Europe such the restoration of degraded ecosystems which is an essential process because they provide, *inter alia*, a clean water supply, protection against flooding and erosion etc.

DEVELOPMENT DELIVERY CONSULTATION QUESTIONS

Consultation question 1b: What additional measures could be taken to support development and infrastructure delivery?

We believe that development should come without a heavy environmental cost and should be sustainable i.e. high quality development with minimal or compensated for environmental damage, designing in high quality green infrastructure which increase the biodiversity value and enhances ecosystem health, is the way forward. A review of development delivery, even in the current economic climate, should not compromise the principles of sustainable development in the second consultation.

¹ The Scottish Wildlife Trust, established in 1964, has the charitable purpose to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With 120 reserves and a network of volunteers the length and breadth of the country, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. Our vision is of a network of healthy and resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas. This is the 'Ecosystem Approach', which is the basis of The Wildlife Trusts' UK Living Landscapes and Living Seas initiatives.

² See: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/2020.htm>

Protecting Scotland's wildlife for the future

Consultation question 3: What additional measures or support could the Scottish Government undertake or provide to facilitate the provision of development and infrastructure within the current legislative framework?

There is scope in the planning system to set up a formalised system of 'biodiversity offsetting'. Biodiversity offsets are conservation measures that are designed to compensate for residual³ biodiversity losses that have resulted from development and/or land use change activities. A key factor being, that they are usually implemented *outwith* the area of development/land use change. Biodiversity offset schemes exist in some form or other in more than 30 countries around the world. Established schemes operate in the United States (e.g. Wetland Mitigation Banking), Australia (e.g. Victoria - Native Vegetation Offsetting) and Brazil (e.g. National System of Protected Areas of the Nature).

It should be noted that this process should not be seen as a 'licence to trash' the natural environment and ecosystem services provided by it, rather it gives an opportunity to enhance the environment through development. This process could help deliver high quality green infrastructure and contribute to large scale environmental projects such as a national ecological network and *Living Landscapes*.⁴

Consultation question 4: What innovative approaches are you aware of in facilitating development and infrastructure delivery and what are your views on their effectiveness?

With regard to biodiversity offsetting, Natural England has pilot schemes underway in England (see: <http://www.defra.gov.uk/environment/natural/biodiversity/uk/offsetting/>) and the Environment Bank has been set up to facilitate the delivery of mitigation and compensation schemes associated with planned development (see: <http://www.environmentbank.com/>)

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

Yours sincerely,



Dr Maggie Keegan
National Planning Co-ordinator

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³ i.e. biodiversity losses that remain after mitigation measures have been put in place

⁴ See: <http://scottishwildlifetrust.org.uk/what-we-do/living-landscapes/> and http://scottishwildlifetrust.org.uk/docs/002__050__publications__Policy_Futures_Series_1_Living_Landscapes__1292841506.pdf