

SPP Review - Priorities for Change

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Policy Ideas

The review is of the SPP as a whole – please consider connections and tensions between policy subjects

Policy Subject/s : **Sustainable Development; Fish Farming, Landscape and Natural Heritage, Trees and Woodland, Mineral Extraction, Coastal Planning**

What works?

Sustainable Development (SD)

Paragraphs 34-40 accord with Section 3E (Sustainable Development) of Planning etc. (Scotland) Act 2006 which states:

- (1) *This section applies to a planning authority in the exercise of any function under this Part.*
- (2) *The planning authority must exercise the function with the objective of contributing to sustainable development.*
- (3) *The Scottish Ministers may issue guidance to a planning authority for the purposes of this section and that authority must have regard to any guidance so issued.*

These paragraphs in the SPP provide clear and precise guidance to planning authorities in their preparation of development plans which must be aligned with the objective of contributing to sustainable development.

This Section on SD integrates with the all other sections of planning policy and indeed must and should be woven throughout local development plans. Scottish Wildlife Trust believes that these paragraphs should be retained in their entirety.

Fish farming

Paragraph 104 states: *There is a presumption against development of marine finfish farm developments on the north and east coasts to safeguard migratory fish species.*

While the Scottish Wildlife Trust would like to see this policy upheld it is unclear to us why migratory species such as Atlantic salmon and sea trout with origins in the rivers of the west coast or the western and northern isles are not afforded the same protection from potentially harmful marine finfish farms.

Consideration should be given to extending this presumption against development to areas within the current aquaculture zone. Such a policy could be guided by an assessment of the sensitivity of local salmonid stocks to finfish farm development utilising tools of the type being developed by the Rivers and Fisheries Trust of Scotland through its *Aquaculture Mitigation, Management and Liaison Programme*.

This section should make reference to the emerging marine planning system; indeed it should sit in coastal planning, and afford the appropriate protection of Marine Protection Areas as well as other natural environment features already referenced.

Landscape and Natural Heritage

As stated in Section 129 of the SPP: all public bodies have a duty to further the conservation of biodiversity under the Nature Conservation (Scotland) Act 2004, and this should be reflected in development plans and development

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management decisions.

Because of this we believe that Sections 125-145 should at the very least be maintained.

However, we believe that this Section should be updated to align with the Land Use Strategy (LUS)¹ which was a commitment by the Scottish Government under Section 57 of the Climate Change (Scotland) Act 2009 to provide guidance on sustainable land use (see LUS principles set out on page 4).

Maintaining and enhancing biodiversity (species richness) is essential to ensuring ecosystem health and any significant biodiversity losses will impact on the quality of ecosystems and ecosystem services provided and by extension will affect the health and wellbeing of Scotland's people.² Scotland failed to meet its Convention on Biodiversity 2010 target³ which required every signatory to contribute to halting the decline in global biodiversity by the year 2010, **therefore the planning system must provide a clear steer on biodiversity by both protecting important hotspots of biodiversity/ecosystems from development and enhancing biodiversity where development is taking place.**

Paragraph 125 sets out the importance of the natural environment to Scotland's prosperity. Healthy ecosystems provide services such as crop pollination, flood alleviation, carbon sequestration, soil fertility and clean water and are therefore crucial to support Scotland's economy and peoples' health and wellbeing. The total value of these services to Scotland is in excess of £21 billion per year.⁴

Accompanying the LUS is guidance on applying the ecosystem approach⁵ to land use. The principles of an ecosystems approach is to promote improved decision-making.

We believe the updated SPP should align and adopt the ecosystem approach to planning decisions which affect the environment and by extension ecosystems and the services they provide.

Section 126 which states: *a strategic approach to natural heritage in which wildlife sites and corridors, landscape features, watercourses, and areas of open space are linked together in integrated habitat networks can make an important contribution to the maintenance and enhancement of biodiversity and to allowing ecosystems and natural processes to adapt and respond to changes in the climate* goes is a step in the right direction towards the ecosystem approach.

One of the key components of the EA is involving people at the beginning of the decision making process- therefore Section *Community Engagement* should be updated to reference the ecosystem approach.

To conclude- the Scottish Wildlife Trust would like to see this Section strengthened rather than 'watered down.' There is a real danger that by focussing the revised SPP on the economy, Scotland could lose its most valuable asset which is its 'natural capital stock' from which ecosystem services flow.

In addition, weakening of this Section would be contrary to the Nature Conservation(Scotland) Act 2004 and the Climate Change (Scotland) Act 2009 and would conflict with the Scottish Biodiversity Strategy and guidance to planning authorities on sustainable development which are set out as requirement of Planning etc. (Scotland) Act 2006

Trees and Woodland

Woodland provides substantial benefits to both wildlife and people. As the former climax vegetation community over much of Scotland, woodland and scrub supports more species than any other terrestrial habitat, particularly

¹ See: Getting the Best from our Land <http://www.scotland.gov.uk/Resource/Doc/345946/0115155.pdf>

² Cardinale et al (2012). Biodiversity losses and its impacts on humanity. Nature: **486** pages 59-69

³ The Convention on Biological Diversity in 2002 set a target to achieve by 2010 a significant reduction of the current rate of biodiversity loss at the global, regional and national level as a contribution to poverty alleviation and to the benefit of all life on Earth. Scotland has its own national target

⁴ RPA & Cambridge Econometrics. (2008). *The Economic Impact of Scotland's Natural Environment*. Scottish Natural Heritage Commissioned Report No.304 (ROAME No. R07AA106).

⁵ The Convention on Biological Diversity's definition of the ecosystem states: The ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

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ancient semi-natural woodlands which are the surviving descendants of our original natural forests. These are vitally important, irreplaceable reservoirs from which wildlife can begin to spread back into newly restored habitat thereby helping Scotland's ecosystems to recover from centuries of degradation.

Ancient woodland has high biodiversity value, and trees provide ecosystem services such as carbon sequestration, cultural value and flood prevention. We know that Scotland's native trees are under pressure not just from land use and climate change but also from novel pathogen such as that which has caused the current and irreversible outbreak of ash dieback.

Therefore, Scottish Wildlife Trust believes there should be a presumption against development on all ancient woodland as this is now so limited in extent in Scotland that we cannot afford to lose what little remains.

We believe this Section (146-148) should be retained and if anything strengthened which would accord with Nature Conservation (Scotland) Act 2004 and the Climate Change (Scotland) Act 2009 and the Scottish Government's Forest Strategy.

What doesn't work and why?

Mineral extraction

Paragraph 230 states: *Commercial peat cutting raises particular environmental concerns, and will only be acceptable in areas of degraded peatland which has been significantly damaged by human activity and where the conservation value is low and restoration is not possible. All areas of peatland that retain a high level of natural heritage conservation interest, archaeological interest or are of value as carbon stores should be protected through development plans and development management decisions.*

We believe this section should be revised – there should be a presumption against all commercial peat cutting and ongoing activity should be phased out regardless of the quality of the peatland. This policy would then be aligned to the Scottish Government's ambitious climate change reduction targets and its commitment to restore degraded peatlands.

What is missing?

Landscape and Natural Heritage

Any revision of this Section must include and give guidance to the protection of Marine Protected Areas.

Coastal planning

The revised SPP must reference and be aligned to the National Marine Plan and Marine Protected Areas – the interface and responsibilities regarding coastal and marine planning must be clearly stated in the new SPP.

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

This section should have been covered for each of our responses above.

To conclude - it should be remembered that the Scottish Government's aim for sustainable economic growth and its emphasis on place making both depend on the quality of the environment, its biodiversity therein and the health of ecosystems. In the revised SPP, any erosion of the protection of the natural environment and biodiversity will have a significant and detrimental effect on the central purpose of the Scottish Government.

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