

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

21 June 2012



Dear Ms Ferguson,

RE: CONSULTATION ON FEES FOR PLANNING APPLICATIONS 2012

The Scottish Wildlife Trust¹ welcomes the opportunity to comment on Consultation on Fees for Planning Applications 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*"

We note that the aims and principles underlying the proposed amendments are that planning authorities should overall receive adequate resources from the planning fee to allow them to carry out their development management functions. In general we are supportive of the proposed changes to the fees structure (section 3.2.2 Fee maximum) - we know from experience that local planners have to deal with very long and complex issues detailed in an Environmental Statement and although they are guided by statutory agencies in their considerations, an understanding of complex environmental issues is necessary so that decisions are made with the best available knowledge and expertise. Therefore an adequately resourced planning system, with in-house environmental/ecological expertise, is necessary to enable decisions to be made based on the principles of sustainable development as outlined in Scottish Planning Policy whilst at the same time ensuring that the planning authority adheres to the biodiversity duty under the Nature Conservation (Scotland) Act 2004

CONSULTATION ON FEES QUESTIONS

2. Linking fees to performance

We note that there is a proposed amendment such that any increase in fees must be inextricably linked to sustained improvements in performance and that Ministers are prepared ultimately to take steps to reduce the fee levels in an authority where improved performance is not maintained. Whilst it may at first seem reasonable to reward planning performance there may be underlying reasons why local authorities are having difficulty in meeting planning performance targets. For instance, from a straw poll we conducted on planning authorities regarding small scale wind farm applications we know that some planning authorities feel stretched. E.g. a central belt reported that they had had to process about 131 applications for 1 - 3

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.

Protecting Scotland's wildlife for the future

turbines over a period of two years. This should be seen in the light of 177 planning staff leaving the profession between July 2008 and July 2010 (75% of whom were professional planners) in response to budget pressures.²

Question 9: Is using site area the best method of calculating fees for windfarms of more than 2 turbines? Y/N

We believe there should be clarity in the site area calculation- does this take in the footprint of the whole windfarm e.g. to include borrow pits, turbines access tracts etc. Will boundaries be smaller than they should be to avoid fees- when in fact the impacts extend beyond what is mapped.

We do also wonder if there will be unintended consequences of this cut off point. We believe that wind farms should be designed in appropriate locations that are sited to have a minimal impact on ecological receptors. We would not like to see applications coming forward based on designs that avoid fees.

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,



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National Planning Co-ordinator

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