

Development Plan Examinations Consultation
The Scottish Government
Area 2H South
Victoria Quay
Edinburgh
EH6 6QQ

20 June 2012



Dear Sir/Madam,

RE: DEVELOPMENT PLAN EXAMINATIONS 2012

The Scottish Wildlife Trust¹ welcomes the opportunity to comment on Consultation on Development Plan examinations 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*"

Question 1: How well do you think the examination process is functioning and should any changes be made to the process at this stage?

and

Question 2: If you think changes are needed which option do you support, and why?

Whilst we believe that it may be too early to judge how the process is bedding in terms of the examination process we do have some general comments to make based on our experience of development planning.

Although the modernised planning process is deemed to be more 'front-loaded,' communities of interest and interested communities still find it difficult to engage with the process. A charrette type process² where there is active community engagement rather consultation would appear to be the way forward and may lead to less protracted and contentious development plan examinations.

With regard to whether a Reporter or local authority should have the final say in issues such as identifying sufficient housing land, we believe that the decision should not be 'developer led' rather policies in the plan and sites identified for development should be considered with regard to the principles of sustainable development as outlined in Scottish Planning Policy. This means that environmental considerations should be equal weighting to social and economic factors.

With regard to restricting the scope of the plan which would be decided by local authorities this could have the unintended consequence of skewing the examination and stakeholders who may have genuine issues may feel more disenfranchised by this process. This process would rule out local issues such as development on local biodiversity 'hotspots' or well used and loved local greenspace.

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://www.scotland.gov.uk/Topics/Built-Environment/AandP/Projects/SSCI/SSCICharretteSeries>

Protecting Scotland's wildlife for the future

In our opinion, Option 4 does not appear to encapsulate the modernised transparent and more inclusive planning process and the dangers of following this route are already outlined in the consultation.

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 faithfully,

A handwritten signature in black ink, appearing to read 'M Keegan'.

Dr Maggie Keegan
National Planning Co-ordinator

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