



NPF Team  
Area 2J-South,  
Victoria Quay,  
Edinburgh  
EH6 6QQ

1 July 2013

Dear Sir/Madam,

**RE: NATIONAL PLANNING FRAMEWORK 3 - MAIN ISSUES REPORT AND DRAFT FRAMEWORK**

The Scottish Wildlife Trust welcomes the opportunity to comment on the Consultation on the National Planning Framework 3 - Main Issues Report and Draft Framework.

The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. We have a 25-year vision for Scotland in which we want to see a network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas.

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.

We believe the way forward to protect and enhance Scotland's biodiversity and wildlife is to adopt an ecosystem approach to nature conservation and for society to recognise that healthy ecosystems are the foundation of Scotland's prosperity. The conservation of biodiversity is key to ecosystem health; without thriving biodiversity, ecosystems begin to malfunction, are less resilient to change and lose significant value. By working in partnership through our Cumbernauld Living Landscape and Coigach Assynt Living Landscape initiatives we are demonstrating how we can manage land to deliver environmental, social and economic improvements at a landscape scale.

**General points**

We are pleased that in the forward to NPF3 MIR the Planning Minister acknowledges that: *Scotland's natural assets underpin the economy and quality of life*. The Scottish Wildlife Trust believes that the creation of high quality places where people want to live their lives should be a priority of National Planning Framework 3 (NPF3) and indeed Scottish Planning Policy.

The environment is the context for all activity, be it economic or otherwise, and any meaningful planning strategy should facilitate and promote the provision of accessible, high-quality, biologically diverse and connected green infrastructure. 'Designing in' nature-rich and connected green (or blue) infrastructure across Scotland -which we would collectively call - a National Ecological Network- be it to benefit urban or rural communities, would bring health, social and economic advantages to Scotland.

**Patron** HRH The Prince Charles, Duke of Rothesay **Chairman** Allan Bantick **Chief Executive** Simon Milne MBE

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The Scottish Wildlife Trust believes that Scotland has the opportunity in NPF3 to lead the way in European planning by giving planners a clear steer towards enhancing and protecting Scotland's natural assets through planning for well-connected green infrastructure. As such, as we set out below, we would like to see a National Ecological Network included as a national development in NPF3.

### CONSULTATION QUESTIONS

#### **2: How can we provide better spatial guidance for onshore wind?**

*Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government's proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?*

Yes we agree this mapping tool would be appropriate to identify areas of wild land character which need to be avoided. We believe that some such areas may have high ecological value because they may contain rare species / habitats or ecosystems. As a caveat, identifying more 'no-go areas' defined by lines on maps will put further pressure on those species, habitats and ecosystems *outwith* these boundaries.

#### **3: How can onshore planning best support aspirations for offshore renewable energy?**

*Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?*

We do not believe that onshore infrastructure for offshore wind, wave and tidal energy developments in the three broad regions identified should be included as a national development. If marine renewable energy projects were to progress in these areas as single large developments this step could be considered to be a logical one. However, there remains considerable uncertainty over the time frames and feasibility of multiple offshore renewable energy proposals, which are all subject to individual technological, environmental and commercial constraints.

We welcome the recognition that there is a need in future for improved coordination to limit the number of landfall sites. We are hopeful that the implementation of a new system of marine spatial planning at the regional level that facilitates integrated decision making between terrestrial local development plans and marine planning systems allows projects that affect both to be considered as a whole.

#### **7: Can NPF3 do more to support sustainable use of our environmental assets?**

*Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?*

*Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?*

The Scottish Wildlife Trust believes that the strategy should indeed be ambitious and we would like to see a National Ecological Network, which would build on the Central Scotland Green Network (CSGN), included as a national development in NPF3.

NPF2 endorses the concept of a National Ecological Network by stating:

*The creation of national ecological networks, potentially encompassing large strategic habitat restoration projects, could make a major contribution to safeguarding and enhancing biodiversity and landscape, make it easier for species to adapt to climate change and create a better environment and new opportunities for local communities. Major linear infrastructure projects such as railways, roads, pipelines and cables should*

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*be seen as opportunities to strengthen green infrastructure and ecological networks. River basin management plans should highlight opportunities to enhance the ecological health of the water environment.*

Therefore we believe that it would be a regressive step if reference to a national ecological network was removed from NPF3.

With regard to specific actions in relation to meeting climate change targets, the National Ecological Network would provide significant opportunities for carbon sequestration and storage. Peatland restoration projects, sustainable forest management and creation (linked to the Scottish Forestry Strategy) and improvements in soil carbon storage through modified agricultural practices would all contribute to the network.

In terms of adapting to climate change a national ecological network would contain the elements that would equip Scotland with the means to withstand climate change perturbations such as increased and prolonged rainfall events. Strategic tree planting in upland catchments, peatland restoration and buffer strips across the agricultural landscape would help slow water movement in the catchment and this could be augmented by increasing the quality and quantity of urban green infrastructure, such as street trees, sustainable urban drainage systems and green roofs.

NPF3 proposes to *identifying opportunities to enhance green infrastructure and environmental resilience* and brings forward proposals such as the CSGN and *having a national network of long distance routes to be designated as a national development*. We believe that both of these initiatives can be included in a National Ecological Network (we expand further below).

We would refute the reason set out in paragraph 3.13 against a National Ecological Network being a national development - it states that:

*As we want to prioritise action to achieve measurable outcomes in the coming years, we do not consider that such a broad suite of measures, reliant as they are on land management practices, the Scotland Rural Development Programme and other mechanisms, is appropriate for designation as a national development in the third National Planning Framework.*

We believe the same argument could be used against the CSGN. Indeed, it is because we need to adopt a more strategic (ecosystem) based approach to land management practices, being smarter in how we use scarce resources to deliver multiple benefits, that we believe a National Ecological Network provides the answer of how to target action - it would guide green (and blue) infrastructure activities across Scotland.

The objectives of the National Ecological Network would be to:

- Safeguard and enhance Scotland's natural capital
- Restore ecosystem health and so improve ecosystem services thereby increasing Scotland's prosperity
- Bring a level of strategic planning for the natural environment more commonly associated with major infrastructure projects
- Mitigate climate change and provide natural solutions for adaptation measures to climate change
- Deliver sustainable catchment management to improve water quality and reduce flood risk
- Provide decision makers with the tools to be more strategic regarding allocating funding streams (e.g. SRDP) to green/blue infrastructure enhancements
- Give a clear steer to developers that green (or sometimes blue) infrastructure is integral to planning and should be designed in from the outset of the planning process
- Re-stitch Scotland's habitats together across the landscape

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- Kick start a green collar economy

In addition to adding value to a *Natural Place to Invest*, we see a National Ecological Network being able to contribute to some of the issues discussed in this consultation such as:

- Decarbonisation of transport and reducing the need to travel
- A connected place
- Health
- Green networks
- Vacant and derelict land
- A successful and sustainable place
- Sustainable resource management
- Long-distance routes
- Tourism, recreation and the visitor economy

### **8: What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?**

*Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?*

NPF3 should have due regard to the 2020 Challenge for Biodiversity, which support the Convention on Biological Diversity Aichi targets- relevant targets being 2- 4:

- *Target 2*  
*By 2020, at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes and are being incorporated into national accounting, as appropriate, and reporting systems.*
- *Target 3*  
*By 2020, at the latest, incentives, including subsidies, harmful to biodiversity are eliminated, phased out or reformed in order to minimize or avoid negative impacts, and positive incentives for the conservation and sustainable use of biodiversity are developed and applied, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socio economic conditions.*
- *Target 4*  
*By 2020, at the latest, Governments, business and stakeholders at all levels have taken steps to achieve or have implemented plans for sustainable production and consumption and have kept the impacts of use of natural resources well within safe ecological limits.*

### **9: Can NPF3 do more to support sustainable tourism?**

*Should a national network of long distance routes be designated as a national development? What new links should be prioritised?*

*How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?*

We are supportive of a national network of long distance routes. However, rather than having a national network that fits one purpose we believe multiple benefits including the long distance route, could be delivered by investing in a National Ecological Network which has the dual purpose of being of benefit to people and wildlife. The quality of the visitor experience would be enhanced by ensuring that any long distance route adds value to biodiversity - thereby enhancing the chances of visitors experiencing a more rewarding and memorable encounter with wildlife along their route.

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We envisage a National Ecological Network, working at multiple scales connecting people from their doorstep in the urban environment to the peri-urban and ultimately the rural hinterlands - in so doing this would also form part of the long distance network.

With reference to the argument given against a National Ecological Network (Section 3.13 - see above), we are puzzled as to why this reasoning would not apply to a national long distance network too.

### **10: Can NPF3 do more to support sustainable resource management?**

*Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?*

In answering this question, for similar reasons to those which we stated above, we would envisage sustainable catchment management being included as part of a National Ecological Network. We believe that decision makers should be looking for nature based solutions, where possible, to deliver multiple benefits- as was shown in the Glasgow Drainage Plan. The plan has prioritised the location and enhancement of green and blue infrastructure in order to deliver additional benefits as well as sustainable water management - such as increased biodiversity and improvement in the quality of places where people live. The guiding principles of the plan included *inter alia*:

- *Enhancement of the urban biodiversity and landscape*
- *Reconnection to Glasgow's waterways*
- *Creation of integrated blue-green networks*

### **12: How can NPF3 best contribute to health and wellbeing through placemaking?**

*Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?*

We would support the retention of the CSGN- but we believe that NPF3 should be more ambitious and extend the network to encompass a National Ecological Network.

With regard to contributing to health and wellbeing through placemaking, a National Ecological Network in an urban setting could provide a focus for the coordinated development and retrofitting of green infrastructure such as biologically diverse greenspaces and parks, green roofs, tree-lined streets, cycle routes and sustainable urban drainage systems. Incorporating these elements would help make the urban environment, in which more than 80% of Scotland's people live, more permeable to wildlife but would also provide natural services such as slowing water runoff, increased pollination, improved air quality and increased attractiveness of local neighbourhoods.

There is also increasing evidence to show that provision of high quality outdoor spaces (which would be part of a National Ecological Network), be it to benefit urban or rural communities, is essential for physical activity,<sup>1,2</sup> positive mental well-being<sup>3</sup> and healthy childhood development.<sup>4</sup> Contact with nature has also been shown to reduce the severity of childhood Attention Deficit Hyperactivity Disorder.<sup>5</sup> In addition, it has

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<sup>1</sup> Tanaka A., Takano T., Nakamura K., (1996) Health levels influence by urban residential conditions in a megacity. Tokyo Urban Studies 33: 879-945.

<sup>2</sup> Sugiyama T., Thompson C.W., (2007). Older people's health, outdoor activity and supportiveness of neighbourhood environments. Landscape and urban planning. Vol 83 (2-3) 168-175

<sup>3</sup> De Vries S, Verheij R A and Groenewegen P (2001). Nature and Health .The Relation between health and green space in people's living environment. Euro Leisure-congress Netherlands.

<sup>4</sup> Sadler et al (2010) Bringing cities alive: the importance of urban greenspaces for people and biodiversity. Urban ecology (ed. K.J. Gaston) Cambridge University Press, Cambridge.

<sup>5</sup> UK National Ecosystem Assessment (2011) Page 386

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been found that income related health inequalities are reduced by having easy access to high quality greenspace.<sup>6</sup>

Yours faithfully



**Dr Maggie Keegan**  
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<sup>6</sup> Mitchell R, Popham F (2008). Effect of exposure to natural environment on health and inequalities: an observational population study. The Lancet, Volume 372, Issue 9650, pp1655- 1660.