



Scottish Wildlife Trust – Response to the Scottish Government Consultation on the Draft Scottish Planning Policy: Sustainability & Planning

### Consultation Question 1

Y N

Do you think the SPP should include a presumption in favour of development that contributes to sustainable development?

This is a difficult question to answer because the Scottish Wildlife Trust does not think there should be a presumption in favour of development per se - as this makes planning a developer-led system not a plan-led system. We believe **all** approved developments should be sustainable development and decisions should be made after considering in an equitable way the three pillars of sustainable development. We realise that the presumption in favour of development as written in this section is following the English planning system, but we believe that without adequate guidance on what constitutes sustainable development hard pressed, and in some cases under resourced local authority planners, may find it difficult to tell the difference between sustainable development and development. We do not think the guidance in section 7 is appropriate because it places a disproportionate emphasis on the economy (first and second bullet point). See also below.

### Consultation Question 2

NO

Do you think the proposed approach to sustainability and planning is appropriate?

NO

Whilst we agree that planning should enable development that creates sustainable places across Scotland, we do not believe that the new proposed section on planning and sustainability will lead to better decisions being made which will create the high quality and enduring places that the Scottish Government wants to see. We believe guidance in this section of SPP should be very clear as to what constitutes sustainable development; at the very least sustainable development should be defined and the five 'guiding principles' should be stated: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. This would accord with section 3E of The Planning etc. (Scotland) Act 2006.

We believe the wording in section 27 of the previous consultation draft of SPP was more aligned to sustainable development (SD) than the wording that is now proposed in section 7. We question why there is now additional emphasis given to the economy and economic strategies (bullet points one and two). This change means that the guidance does not now accord with the principles of sustainable development which gives equal weighing to the three pillars of SD (i.e. economy, environment and society). We believe that the guidance as written, with its accent on

economic considerations, may lead to developments being approved that support economic growth but are not sustainable.

We also believe that bullet point 8 in section 7 should reinstate the word biodiversity (as in Section 27) and, to align further with the Scottish Biodiversity Strategy, should refer to protection and enhancement of ecosystems.

To conclude we believe the guidance in Section 7 gives too much weighting to the economy and because of this we do not think the new approach to sustainability and planning accord with the principles of sustainable development.

As written, this section could be interpreted as being a presumption in favour of development that supports the economy rather than development that is sustainable. For this reason we would prefer the emphasis on economic considerations removed.