

NATIONAL PLANNING FRAMEWORK (NPF4) RESPONSE TO THE SCOTTISH GOVERNMENT'S CALL FOR IDEAS

1 : What developments will we need to address climate change?

'Nature-based solutions'. The NPF should encourage, facilitate and provide incentives for 'nature-based' contributions to reducing emissions, such as -

- protecting and enhancing the extent and quality of peatlands (to store carbon, reduce flooding and improve water quality) ;
- protecting and enhancing woodlands to store carbon (a strategic, rather than market-driven, approach is needed, with a focus on native woodland creation) ;
- reversing biodiversity loss to enhance storage of carbon in plant communities ;
- conservation and reinstatement of habitats such as grassland, wetland and saltmarsh (again, as a contribution to carbon storage) ;
- establishing connections between carbon-absorbing habitats.

Renewable energy. The NPF should be underpinned by a reassessment of Scotland's energy requirements to 2050 and should incorporate a strategy for meeting them. This strategy should include spatial planning for the capacity and siting of onshore wind (in place of the current *ad hoc* developer-led proposals). Onshore wind installation should avoid habitats which are important for carbon storage (see above) and areas of wild land (as in the SNH wild land areas map currently in use). The NPF should promote greater focus on offshore wind and the use of tidal power.

2 : How can planning best support our quality of life, health and wellbeing in the future?

Planning has important roles to play in directing the extent, quality and location of, for example, housing, health and education services, and thus in reducing inequalities in quality of life, health and wellbeing.

But quality of life is not just about material provision. Planning can also contribute to intangible benefits, such as -

- the experience of nature and wildlife within towns and cities (which is influenced by housing density and the provision of greenspace) ;
- the enjoyment of scenery, nature and wildlife in the countryside ;
- the special experiences offered by wild land and remote places.

In this context the planning framework can be both proactive (eg in encouraging the provision of greenspace within new housing developments) and protective (eg in directing development away from sensitive areas).

3 : What does planning need to do to enable development and investment in our economy so that it benefits everyone?

The planning framework can contribute to such enhancements as the following -

- investment in green energy and infrastructure ;
- creation of 'green' jobs ;
- investment in the digital systems needed to facilitate the rural economy ;
- improvements in public transport and in transport links between city and countryside.

4 : What policies are needed to improve, protect and strengthen the special character of our places?

Fundamentally, the NPF provides an opportunity to reiterate the basic, but often neglected, fact that both the natural and the built heritage of Scotland have special character. In my view the NPF should stress that this special character needs to be protected and enhanced – for its own sake, for the value it has as regards quality of life, for the benefit of visitors to Scotland and for the sake of future generations. To some extent this is a question of public attitudes and perception but the NPF can assist by providing a robust system of protection, building on present legislation and guidance but ensuring these are strengthened and properly put into practice when assessing development proposals.

In this context I think that the NPF should aim to -

- reiterate the essential concept of 'sustainability', ie that what the present generation does should not diminish the assets available to future generations (nowadays the term is often (mis-)used to mean little more than 'vaguely green') ;
- re-emphasise the value of 'intangibles' in quality of life and wellbeing (cf Q2 above) ;
- at the same time, highlight the importance of 'natural capital' (cf the value of nature-based solutions to the climate emergency – Q1 above) ;
- encourage the recognition and protection of the special character of towns and cities, including their town and city centres and high streets ;
- encourage stronger protection of the built heritage, particularly in planning authorities' assessment of development applications ;
- promote the importance of the protection and enhancement of natural habitats and of connections between them (here, the NPF should be aligned with any future legislation on post-Brexit environmental standards) ;
- deliver stronger protection of wild land (the Wild Land Areas identified in the SNH map could be given equivalent status to National Scenic Areas) ;

- review the powers available to National Park Authorities with a view to strengthening control of development within National Parks.

5 : What infrastructure do we need to build to realise our long term aspirations?

The answers above already identify some kinds of infrastructure likely to be needed : for renewable energy (Q1), for greenspace in urban contexts (Q2) and for the rural economy and transport (Q3). However, see also the answers to Q1 and Q4 for the importance of siting of infrastructure to avoid areas which are significant for carbon storage or are otherwise sensitive.

Fundamentally, the potential contribution of infrastructure to economic development should always be assessed against the potential impact on quality of life, the environment, nature, wildlife, natural capital, wildness, other special character of place, and sustainability in a meaningful sense.

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