

Scotland's Fourth National Planning Framework

NPF4 Call for Ideas

Aberdeenshire Council Environmental Health welcomes the Scottish Government's commitment to ensure that the planning framework is designed to respond to the global climate emergency. We also welcome recent policy announcements that health and wellbeing will be at the heart of all future Scottish Government policy and trust that this will be evident in the new National Planning Framework 4.

Climate Change

It is recognised in the preamble to this Call For Ideas that climate change will lead to more variable weather, including hotter and drier summers and different weather patterns. Already within the north east of Scotland and Aberdeenshire in particular we are seeing drier weather leading to reduced ground water levels and a consequent significant impact on communities and residents who use private water supplies. With this increased risk of water shortages, coupled with the inherent health risks in consuming insufficiently disinfected or treated water supplies, there must be a commitment within Scottish Planning and Infrastructure Policy to improve mains water infrastructure in our rural communities and thus ensure that everyone in Scotland has access to a reliable supply of safe, clean and potable water.

It is also recognised that renewable and sustainable energy sources will require to be developed to fuel our growing electricity needs and to allow a move away from unsustainable fossil fuels that power our industry, heating and transport. Solar energy, air or ground source heat pumps, tidal energy are all sustainable sources that cause minimal impacts on the health and wellbeing of our communities. We would like to see a commitment to ensure that every new development must include renewable sources for energy use. There must be no more development which relies on unsustainable energy sources.

Bearing in mind the commitment to health and wellbeing we must also ensure that adverse impacts of our renewable energy choices are minimised where possible. Some biomass plant can cause significant impacts to local air quality through harmful emissions of particulate matter or oxides of nitrogen or in some cases lots of smoke and dark carbon. Similarly, some wind turbines can give rise to excessive noise which manifests as a loud thumping or whooping sound, known as amplitude modulation. We must think carefully about the impacts of such technologies and ensure that we have the planning policies and policy guidance in place to minimise negative impacts on our rural communities and give these communities the confidence that the planning framework is working for everyone, and with their health and wellbeing as the key priority.

Onshore Wind

The new planning framework must consider evidence in relation to noise and shadow flicker impacting negatively on those who live nearby. Section 6 of the interim Onshore Wind Policy Statement published January 2017¹ noted that evidence in relation to noise and shadow flicker impacts was being gathered through a Scottish Government commissioned research project carried out by Climate X Change. The research was finalised and published later in 2017². Additionally, research on the amplitude modulation effects of wind turbines, commissioned by DECC (now DBEIS) for the UK Government was published later in 2017³. This interim Onshore Wind Policy statement advised that, following consideration of the new evidence, an update on these recommendations would be published later in 2017. It is noted that the January 2017 interim Onshore Policy Statement, whilst now described as a consultation did not call for any comments to be made in respect of these residential amenity considerations. We also had conversations with Scottish Government noise policy staff at that time and our understanding was that this new evidence was being considered. However, when the finalised Onshore Wind Policy Statement was published in December 2017, there was no further update on the Climate X Change or DBEIS recommendations and no evidence to support its exclusion. Aberdeenshire Council Environmental Health now has extensive experience of wind turbine noise and the detrimental effect it can have on the wellbeing of individuals and communities. The existing enforcement regime under Planning and Environmental law is not capable of controlling the (often) significant impacts that can occur. It is our view that control through the planning system, and through planning conditions is essential, however in order to do this effectively the aforementioned research work must be reviewed and followed up.

By addressing the problem of amplitude modulation through appropriate planning controls we can give communities the confidence that problematic development can and will be addressed. Increasing confidence will in turn mean that the spatial framework for onshore wind can be widened and thus more, much needed, land for onshore wind development will be available.

We must also try to ensure that we are maximising the potential of good, efficient, well planned and well operated wind generation sites and not 'blocking' these sites from future development or expansion by virtue of their being existing poor generating, poorly managed, high noise generating turbines already on or nearby land with good wind resource.

The conclusions of the ClimateXChange reports on noise and shadow flicker must be reviewed and the recommendations carried forward to ensure that a new and 'fit for purpose' planning framework for onshore wind is developed.

Air Quality

There is an ongoing review of the Cleaner Air for Scotland (CAFS) Strategy and Aberdeenshire Council Environmental Health Officer's responded to the specific consultation paper regarding this. Notwithstanding, good air quality is vital to maintaining good health and wellbeing of our population and of our environment and there is also a synergy between positive air quality interventions and positive climate change interventions. The new planning framework must provide support to the implementation of the new CAFS Strategy and CAFS must be enshrined within new Scottish Planning Policy.

General Comments in Response to Questions 1-5 inclusive

We need sustainable, low emission development. In recent years our workplaces have become geographically distant from our workplaces and increased the burden on our transport systems. But we have seen from the recent COVID-19 pandemic that there are many of those jobs which can still be done easily from locations nearer to our homes, or in our homes, using digital technologies. In designing a modern planning framework for our new working, living and leisure environment we must learn from our experience during the pandemic and future proof against other similar risks to our lives.

We can learn from our European colleagues and friends including consideration of existing good practice in urban design in cities where walking and public transport are prioritised, and car use is in decline.

There must be a commitment to ensuring every new dwelling has good quality access to vehicle charging infrastructure. There needs to be a review of public transport provision and significant investment in public transport infrastructure, including widening of access to the railway network through the development of smaller local stations in suburban and rural communities.

We should consider our food supply chain in our planning decisions and create a robust framework which promotes growth of local food production, increased land for communities to grow their own fruit and vegetables and actively discourages unhealthy choices on a daily basis. We can learn from colleagues in Plymouth (who have set up Plymouth Health & Wellbeing Board) where environmental health practitioners are consulted on planning applications where there may be impacts on healthy/unhealthy food choices as well as other environmental health issues.

Planning is an evidence based discipline. We need to improve our evidence base and link this to our planning policies, eg what are the health inequalities in our area and how are these issues translating into what we are building in our area now? We need a planning framework which empowers local authorities to develop effective local planning strategies in conjunction with their communities. Health and wellbeing policies must be part of local development plans.

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References

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2. <https://www.climatechange.org.uk/research/projects/a-scoping-study-on-assessment-practices-for-noise-impacts-from-renewable-technologies/>
3. <https://www.gov.uk/government/publications/review-of-the-evidence-on-the-response-to-amplitude-modulation-from-wind-turbines>