

Our ref: PCS/170299
SG ref: SEA01563/sco

If telephoning ask for:
Susan Dean

Antonia Georgieva-Diaz
The Scottish Government
Victoria Quay
Edinburgh

27 March 2020

By email only to: SEA_Gateway@gov.scot

Dear Ms Georgieva-Diaz

**Environmental Assessment (Scotland) Act 2005
National Planning Framework 4 - Integrated Impact Assessment
SEA scoping consultation**

Thank you for your Scoping consultation submitted under the above Act in respect of the National Planning Framework 4 (NPF4). This was received by SEPA via the Scottish Government SEA Gateway on 24 February 2020.

As required under Section 15(2) of the Act, we have considered the document submitted with regard to the scope and level of detail it is proposed to include in the Environmental Report (ER). Please note that we have only provided comments in relation to the SEA element of the integrated assessment. The attached Appendix contains our detailed comments which we trust you will find helpful. We would welcome the opportunity to discuss the points raised in the Appendix with you in further detail as you progress with the assessment process and development of NPF4. Perhaps an appropriate time to reflect on the SEA proposals would be once the call for ideas stage is complete - please do get in touch if you think this would be helpful.

We note from paragraph 7.1.2 of the screening / scoping report that it is proposed to run public consultation on the ER and draft NPF4 in parallel with the 120 day parliamentary consideration of the draft NPF4. We are content with this proposed consultation period.

Should you wish to discuss this scoping consultation, please do not hesitate to contact me via our SEA Gateway at sea.gateway@sepa.org.uk

Yours sincerely

Susan Dean
Principal Policy Officer (SEA)
Planning Service

Ecopy: sea.gateway@hes.scot; SEA_GATEWAY@nature.scot

Appendix: Comments on the scoping consultation

General comments

We are content with the proposal to integrate reporting on the various assessments required for NPF4 and we note that one output will be an Environmental Report for SEA purposes. We welcome the proposal to provide a summary narrative which will draw together cross-cutting issues from the various assessments. We would stress the importance of the SEA in helping to identify positive environmental outcomes as well as constraints. Presentation of findings should therefore identify opportunities as well as constraints in narrative and / or map form.

We are disappointed that there seems to be little reference made as to how the information contained in the SEA scoping report will influence discussions on the development of the content of the plan itself. This connection is vital given the climate emergency we are now in as changes to the physical climate are having direct impacts on economic and social stability and the potential for achieving sustainable development in the future. It is therefore vital that environmental considerations are embedded in the NPF4 development process – recognising SEA as a mechanism by which to achieve this is key to ensuring efficiency of the plan-making (and assessment) process.

For example, the scoping report identifies the key pressures and environmental objectives which the SEA should consider but there is little or no indication as to how these will be used to frame NPF4 discussions. Utilising the environmental analysis required for the SEA is a key means of ensuring that the plan addresses the full range of relevant environmental risks and opportunities it needs to in order for NPF4 to be a game-changer. The SEA baseline data should be recognised as a starting point from which to identify key issues and to frame discussions around the content of the plan. In this way the SEA can be used as a tool from the very beginning of the plan preparation to identify what the key environmental issues are and how NPF4 can interact with these in order to contribute to a sustainable future.

Baseline information

We are generally content with the proposed environmental baseline and that it reflects the discussions we had with you prior to the submission of the scoping report.

Key pressures

We are content that in general the key existing pressures have been identified in Appendix A – except in regard to material assets which lacks discussion of infrastructure. We are also disappointed at the general lack of context presented with regards to how any of these pressures relate specifically to the NPF4 context. Together these pressures effectively identify the issues most relevant to NPF4 which must be addressed in order for us to be able to prosper within the resources of one planet, drive forward to net zero, and support the Government's ambitions for a circular economy.

Analysis of the information presented in the scoping report should be used as a tool to help to direct NPF4 to the most effective actions / policies rather than just report on potential effects of proposals e.g.:

- **Population and human health** – analysis of this aspect of the environmental baseline and policy context could be used to help develop policy or spatial options in relation to the improvement of air quality, addressing vacant and derelict land, or flood risk management.

- **Climatic factors** – analysis here could help inform discussions around the circular economy or maximising use of existing infrastructure by helping to guide development to areas where there is capacity in existing systems to support growth.
- **Air** – analysis of this SEA baseline and policy context could be used to develop policy or spatial options which could promote blue-green infrastructure in relation to air quality buffer zones.
- **Water** – this baseline analysis could be directly linked to development of policy or spatial options around blue-green infrastructure, flood management, building with nature, sustainable water use and water management.
- **Soil and geodiversity** – the context for soil should recognise and protect soil as a natural capital asset in its own right. Soils should also be seen in the context of the many functions that they provide - not just carbon storage and food production, but also protection of the water environment through for example preventing sediment run off from construction sites, and recognising that sealing soils can change the rate at which water enters rivers etc. It is vital that links to loss of soil function are recognised and understood in the context of NPF4. One of the key pressures on soils is change in land use and land management practice which is likely to be a key component of NPF4 – however Table 2 of the Appendix does not mention this in its summary of key pressures.
- **Material assets** – the discussion of key pressures under material assets has no mention of infrastructure. NPF4 has a crucial role to play in driving forward the future-proofed, resilient infrastructure which is necessary to support place-making ambitions. However the scoping report appears to lack consideration of key pressures associated with existing infrastructure, for example in relation to energy generation and transmission, transport, or water treatment and supply. Understanding the current situation is essential to understanding the potential effects of NPF4 policy and proposals. Analysis of the SEA baseline and policy context presents a real opportunity for providing the basis for discussion on the “infrastructure-first” approach. Opportunities for infrastructure-first also relate to blue-green networks and flood management as well as transport, energy, waste and water.

Relevant environmental objectives

We note paragraph 3.1.7 states that “Objectives for water, soil and air focus on reducing pollution, and reversing the effects of past emissions”. It would be helpful for the commentary in the environmental baseline to reflect on this, for example the latter aspect of “reversing the effects of past emissions” should be a key consideration in the development of NPF4 priorities going forward. We would suggest that as well as identifying key pressures a parallel exercise could usefully be undertaken at this time to identify opportunities as well in order to assist in the development and consideration of “reasonable alternatives”.

Methodology

(i) Scoring

We are generally content with the methodology proposed for the assessment. With regards to the proposed scoring system we would recommend that you also include a score for “unknown impacts”. This is important in order to ensure that where there is uncertainty around effects that this is recorded, hence the level of overall uncertainty can be gauged. This will help inform discussion around reasonable alternatives, for example considering whether a slightly different course of action could result in a positive outcome or a more clearly defined environmental outcomes.

(ii) Mitigation and enhancement opportunities

We would stress the importance of ensuring that where “no impact” is recorded these should all be investigated with regards to the potential to turn these into positive outcomes by considering a different course of action. This is particularly relevant to consideration of opportunities to deliver against existing environmental objectives which are designed to address historic environmental pollution or degradation (as identified in paragraph 3.1.7).

(iii) SEA objectives

We are pleased to note that the proposed objectives reflect our previous discussions with you. We would encourage you to consider adaptive flood risk management as part of the SEA objective proposed for flood risk. In parts of Scotland where flood risk avoidance is just not an option (e.g. The Clyde Corridor), an adaptive flood risk management approach may be able to help unlock major regeneration sites to secure inclusive economic growth and deliver property flood resilience measures. It would be useful to include consideration of this in the SEA.

Integration with RSS and LDP preparation

NPF4 sits at the top of the planning hierarchy therefore it will be important for it to act to guide the RSSs and LDPs for which it sets the context. Alignment of key pressures and opportunities from NPF4 through to regional spatial strategies, city deals, and transport planning to name but a few will help to ensure that environmental issues are recognised and embedded in a proportionate throughout the planning hierarchy. The hierarchy of SEAs will also be an important consideration to help ensure proportionate and focussed use of SEA throughout the hierarchy. We would welcome further discussion with you on how this might be best achieved as NPF4 and its SEA progress.