

CALL FOR IDEAS: NPF4/SPP

Thank you for this opportunity to submit my ideas on the content of NPF4/SPP. I have been impressed by the imaginative ways you are stimulating discussion. My comments and ideas are as follows.

Fundamental changes required

I have heard comment that the time and resources available for the revision of NPF4 and SPP will not allow for fundamental and far reaching changes. I hope that is not true as it would be to miss the only opportunity for many years to change the system in response especially to climate change and species extinction/biodiversity. As the IPCC stated, we only have 12 years from 2018 to make the necessary changes. We can't afford to miss the current opportunity.

Climate change and species extinction/biodiversity

For me, the most important focus of NPF4/SPP should be on tackling climate change and the associated topic of species extinction/biodiversity. These are urgent and existential issues. They require fundamental changes to the existing framework and plan. They should inform all the topics within NPF4/SPP.

Economy

We can't continue to allow economic considerations (as traditionally measured) to trump environmental considerations time after time. A measure of mitigation is not good enough when the net effect is often to put environmental assets under more pressure. We should be placing greater value on those environmental assets in our assessments with the aim that new development results in net gain to the environment.

Cross-cutting policies and collaboration with other sectors/ flooding

One of the key changes should be a strong emphasis on cross-cutting policies and collaboration between planning and related sectors. To take one example, we spend huge amounts of money on flood defences which rely on hard engineering downstream – i.e. within settlements. These schemes always have significant disadvantages, to people and to ecosystems. For many decades, it has been argued that the solution to this lies in addressing land use in the upper catchment. This has not happened. Many towns have been badly flooded in recent years despite downstream flood prevention measures. But the problem lies mainly upstream in the tree-denuded slopes of the catchment, canalisation of rivers and certain farming practices, all of which promote rapid run-off during heavy rain events. It seems that nobody is joining up these issues and creating effective cross-sector policies.

Of course, many of these are matters largely in the control of sectors other than planning (e.g. agriculture, forestry, SEPA), but the NPF/SPP must promote cross-sector working bodies with real power to make the connections between the policies of each sector.

Re-forestation

The IPCC has examined four illustrative mitigation pathways to achieve the required net emissions reductions to keep global temperatures increases below 1.5 degrees centigrade. All four pathways include extensive re-forestation.

I understand that the Scottish Government's target is for 60 million trees planted annually in the UK by 2025 with 30 million of these being in Scotland. However, the UK Committee on Climate Change is recommending the planting of 90-120 million broadleaf and conifer trees each year (Land Use: Policies for a Net Zero UK, January 2020).

The NPF/SPP should be promoting ambitious re-forestation to at least the CCC recommended levels (with aspirations to do better), and addressing the implications for planning of that change in rural land use.

Historically (and pre-historically), Scotland's uplands were well wooded. You can't wander far through our peatlands without seeing the bleached remains of tree trunks poking out from the black peat. Felling, together with sheep and deer in excessive numbers, have decimated those woodlands. What remains has often been described as an ecological desert. I do a lot of hill walking and that thought upsets me when I experience yet another largely wildlife-free day. We need to get back to a more natural balance. I suspect fiscal incentives would be an effective and relatively speedy way to make that change. That lies outside the scope of planning, but NPF4 should be promoting the vision of a very different countryside and be ready to facilitate the considerable land use changes that would bring.

Trees within housing developments

Housing developments should be required to include more trees (of appropriate species) within their layouts, together with mechanisms for their future maintenance.

Development on flood plains

Sensitive development, including housing, is still taking place on flood plains and areas at risk of coastal flooding, despite opposition from SEPA, etc. Policy to prevent this must be tightened up. Sir James Bevan, Chief Executive of the Environment Agency, said in a recent speech (February 2020) that it is not realistic to ban all development on flood plains because they cover so much of the country. He was, of course, referring to England. But is that true of Scotland? If not, we should take a firmer line and ban any more housing in the flood plain. In my experience, policies in current local developments are far too weak. The NPF should also acknowledge that some communities cannot be defended long-term and will need to move out of harm's way.

Private cars

I understand that the use of private cars among younger age groups, especially in cities, is declining. I have read in BBC reports that companies, including Uber, are

planning to introduce driverless taxis, which would be so cheap that many people will find it unnecessary to own cars. That may be some time off, but we need to be thinking about how radically that would reshape our towns and cities. For example, can we start to make the space we currently devote to parking (including on individual house plots) easy to re-purpose in later years?

Electric vehicles

Policies should be in place to accelerate the provision of an effective network of charging points for electric vehicles. Local authorities should be required to adopt standards (or national standards should be set) for provision of charging points, along the lines of current parking standards (scale of development, number of units, proximity, etc.).

But it should be made clear that the aim is still to reduce overall travel by any road vehicles, because even electric vehicles have a climate impact (though significantly lower than petrol or diesel).

Accessibility of housing to public transport and services

The standards for the accessibility of new housing development to public transport, facilities and services must be tightened up and more detailed. The walking distances set out in PAN75 are unrealistic for many people, with consequent increase in car use. The standards should become requirements. This will lead developers to fund the required changes in bus services and to provide local shops and services within estates.

The Accessibility Analysis tool described in PAN75 is rarely used. It could help to deliver better proposals and should be required for most developments.

Housing outside settlements

The era of people living outside settlements for lifestyle reasons rather than for reasons of agricultural or similar employment need requires to end. It is unsustainable to have people living where they will inevitably use private motorised transport for most of their travel. For the same reason, there should be no more expansion of small settlements which have no or very limited services. The government has an ambition to repopulate rural areas, but that should only be within well-served settlements.

Carbon capture and storage

Research and development of carbon capture and storage (including in exhausted oil and gas formations) must be fostered. But this technology should not be used as an excuse for allowing high emission development until it (CCS) is in commercial use. Being CCS-ready is not a sufficient justification for a carbon emitting development.

Carbon targets

NPF4 should set local/regional carbon targets and require them to be incorporated into LDPs.

Greenbelt

The purposes of the greenbelt should be amended to include carbon sequestration via woodland creation, nature reserves, etc.. Such uses should be actively promoted in the greenbelt.

Developer contributions

Net benefit to the environment, biodiversity, and habitat creation and enhancement should be included as valid subjects for developer contributions.

Prime agricultural land

Protection for prime agricultural land should be reinstated. We can no longer afford the permanent loss of large areas of this significant natural resource.

Renewable energy

The weight to be afforded to all types of renewable energy developments should increase.

Energy efficiency

Increased energy efficiency standards for buildings should be promoted at either local authority or national level. More homes should be heated by district heat networks. Developers should be required to consider this option and to justify any proposal above a certain scale which does not incorporate it. Local development plans should have to assess the scope for district heat networks as part of the process for selection of sites.

Transport

NPF4 should be planning for a phased reduction in aviation to reduce emissions.

Water-borne transport is fuel efficient so infrastructure to foster it should be promoted.

Improvements in public transport should have high priority.

Reservoirs

NPF4 should signal the possible need to construct new reservoirs for water supply and power

Sustainable development

The definition of sustainable development is too weak. It allows development where, for example, there is an option of public transport or walking/cycling, but where, in reality, that is very unlikely to form a significant proportion of journeys.

National developments to be included in NPF4

Interconnectors to enable renewable energy generation from the highlands and islands (including Orkney and Shetland) to be exported to the central belt (and beyond).

Urgency

The Scottish Government has declared a climate emergency, so local authorities should be encouraged to make interim amendments to key policies rather than just waiting for replacement plans.

Vision for the future

NPF4 should be looking forward to a period in which, among other things:

- Cross-sector collaboration is the norm
- Woodland cover increases substantially, including mainly native species
- Timber-based technology, research and industry increase
- There is more tree and shrub cover within settlements
- Animal farming declines substantially, as people move to largely plant-based diets
- Arable farming increases
- Use of private motor transport declines, especially in cities
- Settlements become more dense and pedestrian friendly as a result of the reduction in the need for parking provision
- A comprehensive electric vehicle charging network encourages rapid movement away from combustion engine vehicles
- Aviation declines
- Shipping increases
- Public transport infrastructure improves and its use increases
- Active travel infrastructure improves and its use increases
- Health improves as a result of increased exercise
- Deaths from air pollution reduce
- Noise pollution reduces
- Overseas holidays decline and domestic holiday making is revived.
- Buildings become more energy efficient and better insulated
- Renewable energy generation increases, including local projects
- Rural development concentrates in sustainable settlements
- Catchment-wide measures reduce flooding of settlements
- Development moves away from floodplains and areas vulnerable to coastal flooding
- Export of waste for recycling declines
- Biodiversity losses are reversed

- Scotland becomes a world leader in green technologies and industries
- Climate justice is honoured
- UN Sustainable Development Goals for the UK are met