

Comments from Ewen Cameron.

Key underlying principles

As a crucial starting point, NPF4 needs to make it abundantly clear that both it, and consequent Regional Spatial Strategies and Local Development Plans, must address things in a much more holistic way than has been the case in the past. In particular, there is an urgent need to publicly acknowledge and recognise, at all levels and sectors across Scottish society (and with a strong lead from the Scottish Parliament), that the conventional, often unsustainable and short term view of development led planning system has not served Scotland particularly well and to simply continue in such a way is not rationally or reasonably tenable. This is not about laying blame, but about recognising that business as usual will simply continue to disadvantage many Scots and most especially those who have no voice at all - our future generations.

Changes and improvements in the conventional thinking around development planning also needs to be accompanied by clear and unequivocal explanations as to why these changes are necessary; and indeed an honest recognition that many of the past assumptions about development and its full costs/benefits have been based on false or inaccurate analyses. For example, many proposed changes/improvements to our development planning system are often resisted on the grounds of costs - the assertion being that the individual developer, a specific development sector or the Scottish Economy cannot afford them. But the major omission in such assertions is that Full Cost Accounting is rarely, if ever applied. One classic example of this is the extensive development that continued to be allowed in river floodplains when it was well known that such development would be impacted by the growing flood risk that was one consequence of climate change. Such development was undertaken without any accounting of the high cost that would fall to future owners/occupiers, Council costs/services and the Scottish Economy generally. Benefits of such development were talked up while the major and ongoing consequential costs were talked down or ridiculed. It is critically important that a national strategic planning document puts such catastrophic socio-economic fallacies to rest once and for all and requires future development and development planning to be based on full and honest cost benefit analyses. As a country we have been living on an environmental credit card, without even paying the monthly minimum amount, for far too long. Again, this is not about laying blame, but accepting that we have all been living with unrealistic and unsustainable expectations and aspirations.

Although not covered by development planning, it is essential that the impacts of land uses like agriculture are subject to the same sort of rigour and objective analysis that are applied to development. After all, agriculture has a much greater impact on the first three questions posed in this Call for Ideas than development has. Success in addressing **Climate Change**, **Quality of Life** and **Benefit for All** will be relatively insignificant if fundamental change is only applied to built development and ignores much greater sources of impact such as agriculture. For example, I have never been able to understand why the taxpayer financially supports farmers to provide habitat for pollinating insects when thriving local populations of pollinators are in the farming/growing industry's own fundamental economic interest and much less risk of disease transfer associated with the importation of wild bees from Eastern Europe.

What development will we need to address climate change?

In the past, many development plans began with a statement along the lines of - *during the life of this plan we want 2% annual economic growth*. Such statements were often couched in terms of sustainable economic growth, but in fact they were simply sustained economic growth. The first requirement of NPF4 is an unequivocal statement that such a starting point is no longer

acceptable, primarily because it effectively steals opportunities and reduces options for future generations as well as adding costs (usually environment linked ones) that are ignored or dismissed. All development should be required to have simple, independently verifiable, practicable sustainability measures - not simply an unsubstantiated statement by the developer. It would not be easy to have a universally accepted measure, but NPF4 should, at the very least, take ambitious first steps in that direction. The potential plight of the [residents of Fishbourne](#) in Wales due to climate change and the implications for the rest of the UK are very significant. I don't have the resources or expertise to determine the accuracy of such reports, but it would be irresponsible, and indeed negligent, of the Scottish Government to ignore such predicted scenarios without objectively assessing the extent to which issues like these have to be responded to and not simply pushed off onto future generations.

The movement away from development which carries an inbuilt dependence on car travel for work, leisure, education etc. instead of public transport is underway and continues to progress - as it must. But there are other fundamentals which also need to be addressed like the poor energy efficiency of buildings and construction standards generally which could still be much improved. But cost savings should not be the only measure of "success" to be emphasised. The Scottish Government/Parliament needs to be much more open, honest with everyone and make clear that we have neglected our environment for so long and have been so profligate with our natural resources that it is going to cost money to put it right. As we have all shared in that neglect and profligacy for so many decades the bill is long overdue and has to be paid - we need a mature conversation that there is no getting away from these facts and putting it right is going to "hurt".

Without facing up to that reality and helping the whole population of Scotland to understand that reality, technical changes are unlikely to be well received or accepted. Instead of a society that expects everything to continue to get cheaper to buy, Scotland has to become a mature society that recognises that, especially as we have avoided the real costs for so long, the costs of many things will be going up in future as we start to pay more realistic prices for everything - including development. It will be necessary to support the poorest in society, but it may also be that the economic models currently used have to recognise that they are selective and "value" is often not well or accurately recompensed. If the coronavirus outbreak has done anything, surely it has emphasised that people working in the Health and Care Sectors are vital to us all, but are often not recompensed in line with their value/importance to society. I fully appreciate that much of that has little to do with development planning, but in the absence of such joined up and visionary realism, the outcomes in 2050 will never match the aspirations outlined in many of the **"Think Pieces"** which accompany this Call for Ideas.

Therefore, NPF4 must:

- Rebalance from development led planning to planning based genuinely on the [Sustainable Development Goals](#) that Scotland has already signed up to. These must be applied to all development and especially to national infrastructure ones; otherwise signing up to the SDGs would be shown to be nothing other than tokenism.
- Recognise and actively promote the need to ensure that development/developers recognise the merits and long term effectiveness of ecosystem services when compared with traditional "engineered" solutions. Therefore the default position for development should be the incorporation of SUDS, Urban Green Walls, Natural Flood Management and similar approaches/techniques and these should prioritise the lower cost/lower maintenance options rather than the more expensive so-called green solutions based on conventional civil engineering methodologies.
- Recognise and actively promote not only the importance of green/blue space, but also the need for green/blue space to be effectively connected to ensure properly and ecologically functioning habitat networks (i.e. no repeats of the ecologically absurd red squirrel rope bridge across the

A947 just north of the AWPR.) This must include the whole transport network infrastructure (i.e. the role and potential of road verges, embankments and cuttings) and the active participation of all participants (i.e. the acceptance of ecologically functioning SUDS by Scottish Water). The dualling of the A96 has the potential, with a bit of imagination and good design, to become the longest and most effective pollinator corridor in the UK, if not further afield. While Planning Authority Environment Planners and Agencies like SNH and SEPA often give good advice, it is often marginalised by conventional economic arguments and political pressure. Plans need to demonstrate that more robust recommendations from less affiliated organisations have also been given proper and justifiable weight.

- Recognise and actively promote the economic and ecological benefit of retaining more existing semi-natural habitats within development and an enforceable standard of Net Biodiversity Gain in all development, to partly compensate for past and ongoing loss, as well as to make relevant ecosystem services more resilient, consequently more valuable in socio-economic terms and leaving more opportunities available for future generations.
- Lead rational discussion about planned coastal retreat in the face of predicted sea level change and encourage more rational and honest discussion on the feasibility of coastal protection. Similar discussion and action is required in relation to the costs/benefits of holistic flood risk management within our river catchments

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

I don't have many comments to make on most of the "think about" topics relating to this question as I don't have sufficient knowledge or experience of them. However, there are some points which are similar and/or linked to the points I have raised in relation to the previous question and for similar reasons.

Therefore NPF4 must:

- Recognise and promote better building standards to improve the design, construction and standards to ensure much better energy efficiency and therefore the quality of life of those working and living in both individual buildings and communities. There is considerable expertise within Scotland's academic and research organisations to lead the way. The "new" settlement led by Countesswells Development Ltd west of Aberdeen is an example of some of this potential beginning to be realised. As with its uptake of renewable electricity generation, Scotland has to show it is an innovative, world leader in improving the quality of life of all its citizens - not just those who shout the loudest.
- To that end, masterplanning needs to "up its game" as many elements such, as greenspace for outdoor learning, are still too often left as something to be addressed as an afterthought rather than considered as a fundamental from the start and an integral part of the whole plan.
- Before trying to encourage more people to live in rural Scotland, there needs to be a clearer understanding and honest assessment of why we need/want more people to live there and what they will need in terms of public transport and other services so they do not just become second class citizens in communities that cannot be sustained. Such services would have to come at the same time as the new housing/communities or we simply create the problems associated with Scotland's original New Towns - build first and sort out the other things later.
- Ensure major developments are subject to much tighter and rigorous scrutiny up front and more enforceable financial bonds required if they don't work out. Past experience shows that major projects from aluminium smelters and nuclear power stations to Trump International Golf Links, rarely deliver their (often overhyped) promise of jobs, prosperity for the many but instead often

just create environmental damage, social deprivation and blight, with economic gain for the few. Given that there is often a measure of individual, corporate or political vanity in such projects, they really should meet a higher standard of deliverable viability and sustainability.

- There is an understandable emphasis in planning that more development should be on brownfield or derelict land rather than on greenfield sites. The major expansion of Aberdeen Harbour will impinge on some of the very little greenspace available to the residents of Balnagask, one of the areas of highest multiple deprivation in Scotland, yet those residents are unlikely to see much of the benefits of such a development. Furthermore, much of this greenspace has recently appeared as an Opportunity Site in the Proposed Aberdeen City LDP.
- However it needs to be made clear in all development plans that there will be occasions when the development of brownfield or derelict land into community gardens, allotments or wildlife reserve will be much more desirable and valuable for communities generally, especially in areas of high housing density, than yet more housing, business parks etc.

What does planning need to do to enable development and investment in our economy to benefit everyone?

As in my response to the previous questions, a crucial requirement here is a clear spelling out that all growth has to be **sustainable** and not simply **sustained**. Development planning still has too many loopholes which allow unsustainable development to take place with the costs/impacts of that ultimately being borne by those who saw little benefit from the short term gain. This will require some fundamental rethinking and re-evaluating many of the “givens” or assumptions of business, economics and finance. In many respects, the minority have prospered over recent decades and that disparity is probably still increasing.

It seems a little pointless to suggest more specific actions until these basic principles are articulated and more widely recognised and accepted.

How can planning improve, protect strengthen the special character of our places?

Several of the key themes here have also been identified under the previous questions. NPF4 must do a much better job in explaining what things like ecosystem services actually are, why they are important, the specific benefits they provide in terms of our health, wealth and wellbeing and the costs that will eventually have to be paid if they continue to be damaged or ignored. This needs to be done in terms that people can understand and relate to their every day lives and experience.

This could be done by giving a cost of flood damage events to individuals, business, Councils and Agencies and contrasting that with the cost of adding sustainable flood control measures to new developments at the outset. It could be done by contrasting the cost of mental health and wellbeing services with the cost of providing well managed and connected blue/greenspace. It could be done by contrasting the cost of traditional road verge, park and other amenity space grass cutting with the cost of similar areas established/seeded with low cost/low maintenance and low growing native species (such as clovers) which need not simply look neglected. Such low maintenance/native species approaches would also have major pollinator benefits (and their additional cost savings and productivity benefits for farmers and growers). And of course these savings can be directed to other services, as was shown [by Dorset Council](#).

Therefore NPF4 must:

- Require national development projects to be exemplars of best practice in terms of Net Biodiversity Gain and other environmental standards. Often described as “flagship projects”,

they must be so in all respects if, as a country, we are going to deliver anything other than lip service to the aspirations outlined in the Call For Ideas, the Sustainable Development Goals etc. Where a national project is led by a Scottish Government Department, as in the case of the dualling of the A96, Transport Scotland should not be the final arbiter of what constitutes that standard. While there is considerable knowledge and expertise within agencies consulted on such projects, they are not as genuinely independent as other, non-affiliated experts. Such independent representation should be included in the determination of that standard and the standard agreed for national projects should be sufficiently detailed and open to public scrutiny as part of the planning/consultation process.

- Such standards must pay sufficient regard to habitat connectivity and other aspects of ecological function.
- Protected sites, such as Sites of Special Scientific Interest, still function like zoos or wildlife parks - a collection of habitats and species for people to enjoy/appreciate in different ways and in situ. But there is no recognition of the importance of the ecosystem services (such as floodwater retention and slow subsequent release) they provide, their habitat network value to Scotland and the communities that benefit from these services. Site designation in itself is problematic in that it fails to recognise the importance of, indeed the necessity of, better management of the countryside as a whole to ecological function, habitat networks and habitat connectivity. Effectiveness of ecosystem services are further compromised by the tendency to produce land use strategies for individual land use sectors without integrating them under the overarching principle of all of them needing to contribute to the ecosystem services approach. It is very likely that “the answer” is not more protected/designated places but better and more sustainable management of all our land.
- Key to much of this is the need to recognise we can't just carry on as before with some little tweaks here and there. We need an open and honest explanation of the damage that has been done to our environment since the 1950s, why it matters, why it will continue to make things more difficult and more expensive the longer we continue to underplay its importance. It's a lesson we all need to learn.

What infrastructure do we need to plan and build to realise our long term aspirations?

Once again a key element here is the need for an open and honest recognition of the fact that we have not done well since the 1950s and our economic and societal aspirations have taken us along paths that increasingly only benefit the few. Changes that benefit more people are not quick, cheap fixes and will be resisted by the vested interests of those keen to see business as usual. And the longer these changes are avoided and resisted, the eventual cost and difficulty will be greater. Without that honesty as a first step, the aspirational changes outlined in Call for Ideas cannot be achieved. That is perhaps most obvious in the dominance of road transport in our work, leisure, business, economy and resource allocation.

Consequently, provision for public transport and walking/cycling networks need to be a “built in “ part of new development. Retro fitting of these must see route separation as essential, not optional.

Given its longer term view, NPF4 needs to be much more considered in its approach to development which is likely to be at risk from aspects of climate change such as sea level rise, increased flood risk. This needs better construction standards in relation to water run off surfaces in urban areas and land use around infrastructure susceptible to flood risk or land slippage consequent of rapid run off on overgrazed land e.g. the A83.

There is also a need for the requirement to include new and innovative technologies into all new construction such as photo voltaic panels, SUDS etc.

I appreciate that this response is not full of detailed or precise actions. That is because the fundamentals of the approach to and management of development does not have a sustainable basis. The vital need for more sustainable development, and indeed sustainable land and resource use generally, is increasingly urgent. NPF3 needs to address these fundamental failings before it can produce visions and aspirations for a modern Scotland that have a realistic chance of being realised.

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28 April 2020.