

**CONSULTATION PAPER: STATUTORY GUIDANCE ON PLANNING AND SUSTAINABLE DEVELOPMENT**

**GREENSPACE SCOTLAND CONSULTATION RESPONSE**

**Introduction**

1. **greenspace scotland** welcomes the opportunity to respond to the Scottish Executive Development Department's consultation for the draft statutory guidance on planning and sustainable development.
2. **greenspace scotland** was established in 2002 to deliver Scottish Natural Heritage's Greenspace for Communities Initiative. It exists to champion greenspace at a national level, and develop and support action at a local level. Planning has a key role to play in delivering sustainable development, and we are generally supportive of the proposals set out in the draft guidance.
3. This response is based on our experience of working with communities, partner agencies, local authorities and Community Planning Partnerships on planning policy and greenspace issues. We believe that high quality greenspaces can play a very important role in meeting sustainable development goals and in creating sustainable communities.

**Comments**

4. The draft guidance sets out a clear policy context for sustainable development and planning. Our comments on specific sections are listed below.

**General policy context**

5. In general, we see the work of **greenspace scotland** as contributing most strongly towards the sustainable development principles of 'Living within environmental limits', 'Ensuring a strong, health and just society' and 'Achieving a sustainable economy', and we have focused our consultation response on these issues.

*Climate change*

6. We welcome the strong focus on climate change in sustainable development policy, and are pleased to see the recognition (in paragraph 10) of the role that greenspace could play in supporting species migration through green network development. We are also exploring the role that greenspace can play in providing creative solutions to urban drainage problems and flooding, through SUDS and soft engineering solutions. Well designed greenspace solutions to mitigate against flooding and drainage issues would also offer benefits to urban quality of life, biodiversity and healthier communities.
7. We would also highlight other roles that greenspaces can play in mitigating against the impacts of climate change, by tackling air pollution and reducing urban temperatures. This is reflected in recent guidance from the Town and

Country Planning Association (Climate change adaptation by design – a guide for sustainable communities: 2007) which emphasises the role that greenspace and urban design can play in adapting to climate change.

#### *Strategic Environmental Assessment*

8. We are aware of the powerful tool offered by SEA, and the way that this can enable early and effective public participation opportunities.
9. We have recently begun to produce guidance on Health Impact Assessment and greenspace, and are interested in the role that HIA, integrated impact assessment tools and Sustainability Appraisals can play in tackling health, inequalities, social and economic issues. These issues have strong implications for the social and economic aspects of sustainable development. While we accept that compliance with the Act requires a focus on environmental issues, we would welcome additional comment or guidance on how SEA should fit with and complement broader sustainability appraisals or additional impact assessment work.

#### **Planning and sustainable development**

10. The draft guidance sets out a positive principle for planning and sustainable development, and links planning clearly to the 5 principles of sustainable development. Our comments on these links are as follows:

#### *Living within environmental limits*

11. We welcome the emphasis placed on conservation and promotion of biodiversity, and the recognition of the multi-functional benefits which are offered by greenspaces.

#### *Ensuring a strong, healthy and just society*

12. We also believe that greenspaces can make a strong contribution towards 'Ensuring a strong, healthy and just society', through improving quality of life, community confidence and wellbeing. High quality public greenspaces have been shown to contribute to social cohesion and a sense of place and community, and are also linked to positive physical and mental health impacts. In contrast, inequalities in access to good quality greenspace are believed to exacerbate existing inequalities in health.
13. We would welcome additional comment at point 27 on the way in which development can contribute to social and health aspects of sustainable development, in order to demonstrate the significant contribution that planning can make on a these wider issues.

### *Achieving a sustainable economy*

14. We welcome the statement that positive planning and enhancement of the natural environment can have positive economic impacts and create better places in which to live and work. Our research shows that quality of place can offer a range of economic benefits. The stated aim of integrated decisions which benefit local communities and the environment will be key to achieving sustainable development goals.

### **Planning's contribution**

15. We are particularly interested in the contribution which planning can make to promote urban regeneration, and welcome the comment that vacant and derelict land could be considered for the creation of new open spaces, and the multiple benefits that this could bring. We also welcome the clear reference to maintaining and enhancing open space and the signposting to guidance on this topic.
16. **greenspace scotland** is working to support local authorities in the preparation of open space audits and strategies, and we are producing support tools which will aid GIS mapping approaches and quality audit work. We would be happy to give more information on these resources in support of planning work on open space.

### **Outcomes and conclusion**

17. The concluding statements discuss sustainable outcomes for places and communities, and place an emphasis on the protection of natural resources and values which people attach to a place. We welcome this focus on outcomes and the acceptance that sustainable development will require this type of long term view.

### **Conclusion**

18. In conclusion, **greenspace scotland** welcomes the opportunity to comment on the draft statutory guidance on planning and sustainable development, and would be keen to work with the Scottish Executive to aid the contribution of planning towards sustainable development objectives.
19. We are happy to have this response placed in the public domain, and hope that this feedback is helpful in developing the guidance.

**greenspace scotland**  
21 June 2007

**RESPONDEE INFORMATION FORM: *Draft Statutory Guidance on Planning and Sustainable Development***

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

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1. Are you responding as: (please tick one box)
- (a) an individual  go to Q2a/b and then Q4
- (b) on behalf of a group or organisation  go to Q3 and then Q4

**INDIVIDUALS**

- 2a. Do you agree to your response being made available to the public (in the Scottish Executive library and/or on the Scottish Executive website)?

Yes (go to 2b below)

No, not at all  We will treat your response as confidential

- 2b. Where **confidentiality is not requested**, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

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**ON BEHALF OF GROUPS OR ORGANISATIONS:**

3. Your name and address of your organisation **will be** made available to the public (in the Scottish Executive library and/or on Scottish Executive website). Are you content for your response to be made available?

Yes

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**SHARING RESPONSES/FUTURE ENGAGEMENT**

4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future for consultation or research purposes?

Yes

No