

# STATUTORY GUIDANCE ON PLANNING AND SUSTAINABLE DEVELOPMENT PLANS

## SUMMARY

The statutory guidance recognises the topic areas, which planning and sustainable development plans have to cover, in order to be described as “sustainable”. However it does not, as yet, provide the overarching framework/principle of sustainable development from which these topics emerge. This is an opportunity lost to communicate a clear message regarding sustainability, given the experience gathered from the Environmental Assessment legislation.

Statutory guidance should provide:

- (a) A clear communication of internationally recognised principles of sustainability
- (b) A Scottish recognition of internationally recognised definitions of sustainable development, to avoid confusion and overly complicated assessment processes
- (c) The use of the internationally recognised “three pillars of sustainable development” as a foundation for sustainable development planning
- (d) An avoidance of the use of a “catch all” list of subject headers (e.g. waste) which from experience is demonstrating
  - no significant added value is being generated from such a formulaic approach to assessment
  - Tendencies towards large and cumbersome documents that are in antithesis to the principles of the Aarhus convention i.e. to involve citizens in meaningful deliberative processes
- (e) An encouragement towards flexible approaches for sustainability development/assessment where councils seek efficient demonstrations of social, economic and environmental science, within their assessments, without losing the complexity of the planning issues

## DELIBERATION

With a plethora of definitions of sustainable development in existence, unnecessary confusion and inappropriate complexity, in terms of assessing sustainability, is emerging. Differing parties can provide definitions of sustainability that are used to promote certain aspects of the particular process they happen to be involved. We recognise that the Scottish executive has provided a definition of sustainable development, and this may be to avoid confusion. However there is no recognition of internationally recognised

- Definitions of sustainable development
- Conventions, specifically Aarhus, which the UK signed and imbeds the science of the principals of sustainable development.

In that regard, another definition can potentially add to the difficulties we describe above.

With respect to the Aarhus convention, decision making has to move towards more deliberative approaches that involve all the citizens that wish to be included. Aarhus recognises that effective and efficient decision making requires the citizens to be aware of sound scientific principles. The challenge for society is to reduce the science in question to simple analysis without losing the complexity of the issues. Aarhus, together with the internationally established Rio Conference and the Commission for Sustainable Development recognise the “three pillars of sustainable development”:

1. Protection of the Earth,
2. Social Development; and
3. Economic Prosperity.

This is sensible for the following reasons:

- They are the smallest reduction of categories that can contain agendas with common directional goals.
- Without one of these categories, the others cannot function.
- There is not one agenda that cannot fit within all or part of these three categories.

It is recognised that the guidance document refers to social, economic and environmental considerations for sustainability. However this is only on general terms and is used only as an introduction for a set of topics for sustainability for planning. Current knowledge of planning process is demonstrating that these “sustainability topics”, included in the guidance document, have high potential to emerge as a template for any future development plans. Caution is offered here that adoption of such a template has high potential to be resource intensive, provide little added value to current practice and not facilitate involvement from the citizens. The danger of such a template is a movement towards an amalgamated appraisal of sustainability, of a type witnessed in England. This amalgamated approach has two distinct dangers:

- Two general that it misses some key aspects of either of the three categories of social, economic, or environmental or
- Encatching all aspects the document becomes far too large and far too cumbersome and thus will not encourage anybody to read it.

The latter bullet point is a fundamental flaw in any principles for sustainable development. Over arching principle of sustainable development is that everybody should have a say within the planning process. The weighty documents that are currently being prepared for strategic environmental assessment already pay testament to the fact of a flawed process. In antithesis to the principles of sustainable development, these weighty processes of overly large documentation provide a useful weapon for anyone who would seek not to have a great deal of public input to their plans. The lessons from SEA must surely be that local authorities must be actively encouraged to develop their own methodologies of conducting their plans. We are dangerously heading towards an institutionalised culture, by prescribing templates, which creates an unnecessary burden on local authorities to comply. The issue of non-compliance is paralysing any innovative thoughts towards more

efficient practices that allow the citizens to take part in deliberative processes within the planning system.

It is for these reasons this Council would suggest caution in any statutory or any further statutory guidance on how to conduct appraisals for sustainability. We appeal for an encouragement of flexibility in the system with a goal for planners to seek efficient demonstrations of social, economic and environmental science within their assessments without losing the complexity of the issues. In this way, over time, we can begin to understand what is truly effective in generating public consultation and, in doing so, move towards development that is truly sustainable.