

Environmental Protection Scotland

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Call for Evidence – Independent Review of Planning

Environmental Protection Scotland is an organisation part-funded by the Scottish Government and by Local Authority subscriptions and its main aim is to provide training, guidance and policy support for air quality, land quality and noise/nuisance issues. We would request that during the review the panel considers a more efficient and effective approach to assessing and evaluating environmental impact. The local, national and international obligations for air quality, contaminated land, climate change and noise are wide ranging and responsibility for these resides with a range of organisations. During the planning process some evaluation of the combined and cumulative impact on the environment would improve the current system. For example onshore windfarm applications greater than 50MW are evaluated by energy consents division during the planning application stage in order to ensure carbon benefits are realised and retrospectively impacts on Scottish peatlands had to be taken into account. The cumulative impact of all onshore windfarms on Scotland's peat resource would be a much better approach allowing a strategic evaluation. Another example where cross-reference to a wide range of environmental protection issues would have been helpful is in the expansion of biomass as a renewable energy source – here again the impacts on air quality and health were retrospectively evaluated and incorporated into planning decisions. The recently launched Cleaner Air for Scotland Strategy has a focus on the impacts of transport on air quality and the planning system is an important part of achieving the aims of this strategy. Compartmentalising transport emissions whilst useful should not be looked at in isolation but rather the wider environmental impacts need to be considered as well during the planning process.

In summary the pollution swapping and policy proofing across the spectrum of environmental issues would allow the planning system to adopt an integrated, strategic approach to determining the environmental impacts arising from a development. Environmental Protection Scotland would be happy to assist in the review panel regarding the issues raised in this response.

Yours sincerely

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