

## **Scottish Socialist Party submission on Scottish Planning Policy**

### **About the SSP**

The SSP has thousands of supporters across Scotland, in urban and rural areas. Our support tends to be more concentrated among lower income urban groups whose concerns tend to be under-represented by the larger political parties.

Planning policy has a profound impact, for better or worse, on the whole of society. It is tied up with land ownership, energy, climate change, social justice and ecology – all of which are of concern to our members and supporters.

### **Scotland's land**

Scotland's greatest asset, apart from our people, is our land. It sustains many local communities and provides us with food and water. It generates large scale employment in sectors as diverse as agriculture, construction, forestry and tourism. Rural landscapes, especially our mountains, moors, rivers and forests, and the green belt around our urban centres, offer us recreation, peace, beauty and temporary escape from the pressures of day-to-day life.

Yet Scotland has a most unequal land distribution pattern with around 1200 people – under 0.02 per cent of the population – owning two thirds of the land. Because of this concentration of ownership, Scotland's land has been historically mismanaged to the detriment of rural communities, wildlife and the fabric of the land itself. From the destruction of our native forests, to the clearance of vibrant crofting communities; from the planting of vast acreages of inferior commercial forestry on blanket peat bogs to the degradation of much of the Highlands for grouse-shooting and deer-stalking, our land has been ill-treated over the centuries.

We are therefore broadly in favour of the more rigorous planning regime proposed in the consultation papers around Scottish Planning Policy and the National Planning Framework 3, underpinned in some areas by a new map of Scotland's wild land.

This response specifically focuses on Scottish Planning Policy. Where we are in broad agreement with the proposals, or have a neutral position, or lack sufficient expertise to express an opinion, we have refrained from comment. Instead we have concentrated on those sections with which we have concerns, or with which we strongly support.

### **Sustainable development – SPP Paragraphs 24-30**

The SSP supports the principle of sustainable development, defined by the United Nations as 'development that meets the needs of the present without compromising the ability of

future generations to meet their own needs'. As we are in favour of development that contributes towards social and environmental justice, we strongly support paragraphs 24-30.

#### **Climate change – Paras 31-34**

We support targets reducing greenhouse gas emissions by at least 80 per cent by 2050 with an interim target of reducing emissions by 42 per cent by 2010 (**SPP paragraph 32**). We also support addressing climate change through mitigation and adaptation as set out in paragraph 34.

#### **Sustainable economic growth – SPP Paras 15-23**

We believe that successive governments, the four main political parties, and planning officials have tended to over-concentrate on economic growth at the expense of social justice, environmental sustainability, community democracy and ecological protection. In such circumstances the prefix 'sustainable' is often devoid of any real meaning.

At its worst, this approach led successive governments (i.e. the current SNP administration and its Labour-Liberal Democrat predecessor) and local planning officials to facilitate the sale of a designated Site of Special Scientific Interest (SSSI) to the billionaire American property developer, Donald Trump for the purpose of building an exclusive golf course and upmarket hotel complex.

We are concerned that phrases such as 'providing a supportive business environment' and 'attaching significant weight to economic benefit of proposed development' can be used to override social and environmental considerations. Developments are often justified on the grounds that they will create local jobs, or housing, or facilities, or green energy. Yet much development is driven principally by profit for developers and landowners, with the social and environmental benefits at best secondary, and at worst non-existent or even counter-productive.

An out-of-town shopping development, for example, might create jobs in that immediate vicinity, but that is often achieved at the cost of jobs in local towns and cities. Out of town shopping centres also devour valuable green space and generate extra volumes of traffic with an attendant increase in carbon emissions, pollution and local disruption.

A large scale wind farm on a remote peat land hillside might create some temporary construction work (mainly carried out by outside contractors with labour brought in from outside the local area rather than recruited locally, and thereafter remote controlled with some routine maintenance, again carried out by non-local labour). Such a development will definitely guarantee lucrative profits for fuel corporations, paid for by public subsidies via fuel bills (a regressive tax which disproportionately penalises low income households and contributes to fuel poverty). It will also represent a goldmine for landowners – one

Highland landowner, Charles Connell of the old Clydeside shipbuilding dynasty, will make up to £60m from a proposed new huge wind farm in the Monadhliath Mountains if it goes ahead; others who stand to make multi-million pounds fortunes from industrial-scale wind farms include the Earl of Moray, the Duke of Roxburghe, the Earl of Seafield and the Earl of Glasgow. Other beneficiaries include property lawyers, accountants, estate agents and property consultancies such as Cambridge-based Bidwells, whose current advice to landowners renting land for wind farm development includes “moving the land into a separate ownership vehicle” in order to avoid tax.

Such developments can be justified on the grounds that by generating renewable energy, they help reduce greenhouse gases. But in some cases at least, because of the carbon emissions associated with constructing large developments and their associated infrastructure of roads, tracks, buildings, transmission lines and cables, together with the fossil fuel generation required to back-up the development, the reduction of greenhouse gases may be negligible. This is especially the case when wind farms are built on healthy peat lands, which lock in 20 times as much carbon per acre as our forests and, when degraded by development, releases carbon into the atmosphere. Energy developments that are driven primarily by economic growth can be counter-productive to their stated aim of reducing carbon emissions. Such investment might be more effectively directed towards energy reduction measures, which would have the dual advantage of achieving a reducing emissions and reducing fuel poverty.

These two examples are directly relevant to Scottish Planning Policy.

#### **Town Centres – SPP Paras 54-67**

We broadly support most of the content of paragraphs 54-62, which concerns the health of town centres. We would, however, urge stronger protection within the planning system for small businesses against larger retail chains such as Tesco and Sainsbury whose presence is becoming more visible in town and city centres.

We would also support a moratorium of out-of-town shopping centres (SPP paragraphs 58-67), especially at a time when the retail sector is struggling against the combined impact of a weak economy and the growth of online shopping driven by predatory multinational corporations such as Amazon.

#### **Rural development, National Parks and Coastal areas – SPP Paras 68-78**

We broadly support the approach set out in these three sections of the document, although we would argue (para 72) for a specific commitment to explore the possibility of creating new national parks. We further believe that the planning policy objectives set our National Parks are incompatible with privatisation, which would put these landscapes under even greater pressure from commercial development.

### **Buildings – SPP Paras 79-124**

We support most of this section (although we have criticisms about the use of terminology such as ‘housing market areas’ (which suggests that housing is a commodity rather than a necessity). In line with this market-focused tone, paragraph 97 seeks to set a 25 per cent limit on affordable housing in each development (with no limit on unaffordable housing!) Given the desperate shortage of affordable housing, we believe that if there has to be a balance, it should be the other way around. We further believe that within planning policy there should be recognition of the need to identify land for rented social housing, in rural as well as urban areas.

### **Supporting Business and Employment – SPP Paras 104-110**

As with the section on Sustainable Economic Growth, we have concerns that some parts of this section do not give sufficient weight to the social and environmental impacts of growth. Nor does the section recognise the role of the public and voluntary sectors in creating employment.

### **Valuing the Natural Environment – paras 126-154**

We generally support this section of the document, including the well-publicised proposal to safeguard 43 areas of wild land as identified in the new wild land map produced by Scottish Natural Heritage (paragraph 129).

Scotland’s wild land is a part of our national heritage and international profile, and is a major driving force of Scotland’s tourist industry, which has a high proportion of small and micro-businesses, including hotels, cafes, bars, restaurants, shops, campsites, outdoor centres, tour guides. It is the biggest sectorial employer by far in the Highland Council area, accounting for 17 per cent of the total workforce in the region.

Wild land areas are not wildernesses that have been maintained in a natural state. They bear the imprint of human influence over the centuries. Even some of our wildest landscapes have been degraded over the years as result of mismanagement by private landowners. That should be an excuse for further destruction, but a reason for trying to repair the damage of centuries of commercial exploitation.

The SSP supports the transformation of land ownership and management in Scotland, in favour of public and community ownership, along with greater involvement in the management of land by specialist environmental, landscape, wildlife and heritage organisations. In the absence of democratic ownership, we believe that wild land, important National Scenic Areas, National Parks and Sites of Special Scientific Interest must be rigorously protected through the planning system. Irrespective of who currently hold the title deeds, Scotland’s land should be regarded as ‘a common treasury for us all to

share' as opposed to a commodity to be plundered for profit by individuals and corporations.

Of specific concern of many rural communities, and to landscape, nature and outdoor organisations, is the growth in large scale wind farms. Because there is a perception that they contribute towards combatting climate change, many environmentally conscious people and organisations tend to be uncomfortable about asking searching questions of the benefits of a commercially driven approach to renewables. We believe this to be naïve.

We believe that Scotland's most important landscapes should be kept free from all large scale commercial development that undermine their character, such as large scale energy developments, super quarries, open cast mines, roads, major housing developments and tourist complexes. That should not exclude small-scale community owned renewable projects or the construction of sensitively designed and sited houses, camp sites, hostels, visitors centre etc.

#### **Promoting Extraction of Resources – SPP Paras 166-179**

Although an energy mix is necessary at this stage because of the immaturity of much of the renewables industry, we believe that Paragraph 167 should be balanced by a recognition that fossil fuels are finite and a major cause of climate change internationally, and therefore unsustainable in the long term.

We would also call for an explicit ban on hydraulic fracturing (fracking) until and unless all environmental and health dangers have been eliminated.

#### **Onshore Wind – Paragraph 216-224**

We would support the inclusion of the following areas in Group One (Areas where wind farms will not be acceptable):

- Core areas of wild land as set out in SNH map
- Areas of healthy peat land.

We would also draw a clear distinction between large scale commercial farms and small-scale community wind projects owned and managed for the benefit of local people, which in our view should be recognised as acceptable, including within Group 1 areas, if they are well-designed and suitably located.