



**The Scottish Government
Scottish Planning Policy
Consultation**

**Response from Environmental Protection UK
June 2009**

Environmental Protection UK (formerly NSCA) brings together environmental professionals, industry, policy makers, academia and the public to inform debate and influence changes to policy and practice in land quality, air quality and climate change, and noise. We are a national membership based charity with over 100 year's experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Our land quality work is aimed at promoting integrated policies and practices that encourage the use and reuse of land in a way that protects human health and the environment. Our air quality and climate change work aims to reduce the negative effects on health and the environment of both air pollution and greenhouse gasses and through our noise team we encourage the effective management of noise through promoting a better understanding of noise and providing continuity for the noise community.

General comments

Environmental Protection UK welcomes the decision to consolidate 17 different SPPs and NPPGs into one cohesive document. We are disappointed however that there is little mention of noise through out. Noise is only mentioned 4 times in relation to wind farms, open-cast mines and fish farms. We do not feel that this reflects the importance of noise in today's society, a recent survey by Environmental Protection UK found that 28% of respondents say that traffic noise causes stress, with 19% of people saying that it had woken them up.

This planning document highlights what planning authorities should consider when building new developments, e.g. sustainable transport system, cycle paths, integrated public transport, and whilst we support this we feel that noise and noise nuisance should be dealt with at the planning stage. Properly planned developments would be able to minimise noise disturbance; many measures are available to reduce noise impact such as traffic management, sound insulation and noise barriers.

The Environmental Noise Directive (2002/49/EC) requires that noise action plans are developed to manage the effects of noise from transport, rail and air, we feel that these could have been mentioned within this document.

Specific comments

Question	Response
1	No comment
2	No comment
3	No comment

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4	No comment
5	No comment
6	<p>Yes.</p> <p>Throughout the SPP consultation document cumulative impacts are mentioned and it is important that these are considered, especially if new housing schemes are being built. The planning system should allow for careful consideration of vehicle use in these new schemes and ideally would include provision for an integrated transport system that reduces private vehicle use.</p> <p>Likewise the planning system needs to consider the cumulative impacts from biomass units not only in individual planning authority areas but also neighbouring areas.</p>
7	<p>No</p> <p>Paragraph 42 states that planning authorities should adopt a flexible approach to working from home where the amenity of surrounding properties will not be significantly affected. We would urge that noise and other potential nuisance impacts from homes (light, odour, dust) where people are working from home are taken into consideration.</p>
8	<p>Yes</p> <p>We agree that new housing should be integrated as far as possible with public transport, footpaths and cycle routes. We also agree that energy consumption should be as efficient as possible given current technology.</p> <p>Given that most contaminated land in Scotland has been dealt with, so far, by the planning system we agree that developers should look at using previously developed land rather than greenbelt sites for the development of new housing schemes.</p>
9	<p>No</p> <p>Whilst we agree there is a need for low cost, affordable housing, there is no mention of energy efficiency within this section. The Scottish Government's ambitious target for the reduction in CO₂ emissions requires all parts of society to pull together, subsequently we believe that there needs to be an enhanced energy conservation programme and would urge planning authorities to ensure that new housing is built with energy efficiency in mind.</p>
10	No comment
11	No comment
12	No comment
13	No comment
14	No comment
15	No comment
16	No comment
17	<p>No</p> <p>We agree that open spaces, which are valued by local communities, remain protected in a development plan. The European Noise Directive establishes the requirement that existing quiet areas be protected. Many of these are likely to be within public open spaces. This should be clearly mentioned within the SPP</p>

	document, which should make reference to the Scottish Noise Action Planning Guidance which considers the designation of quiet areas.
18	No comment
19	No comment
20	We agree that new development takes place where there is an integrated public transport network as well as cycle routes and public paths and support the decision that no planning permission is granted if there is no sustainable transport system in place and which would cause an increase on the reliance of private vehicles.
21	No comment
22	<p>Yes</p> <p>Provision of a reliable and low-carbon energy supply is one of the most significant environmental issues to be addressed now and in the future. Vital to this is the development of an integrated domestic energy policy that can deliver significant reductions in greenhouse gas emissions and provides a high level of security of supply.</p> <p>It is important that networked renewable energy sources are introduced as soon as possible ensuring that potential risks to local environmental quality and human health are taken into account. We feel that a high level of environmental protection is required and note that the consultation document takes into account the cumulative impacts of any wind or biomass development.</p>
23	No comment
24	No comment
25	No comment
26	No comment
27	No comment
28	No comment
29	No comment

**RESPONDEE INFORMATION FORM
CONSULTATION ON THE CONSOLIDATED SCOTTISH PLANNING POLICY**

Please complete the details below and send it to us with your response. This will help ensure we handle your response appropriately:

Name/organisation: **Iain McLellan, Environmental Protection UK – Scottish Division**

Address: **c/o Glasgow City Council, 231 George Street, Glasgow, G1 1RX**

1. Are you responding as: (please tick one box)

- (a) an individual (go to 2a/b)
(b) **on behalf of** a group or organisation (go to 2c)

2a. Individuals:

Do you agree to your response being made available to the public (in SG library and/or on SG website)?

- Yes (go to 2b below)
No, not at all

2b. Individuals:

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

2c On behalf of Groups or Organisations:

Your name and address as respondents **will be** made available to the public (in the SG library and/or on SG website). Are you content for your response to be made available also?

- Yes
No

3. We will share your response internally with other SG 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