

SPP Review - Priorities for Change

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Policy Ideas

The review is of the SPP as a whole – please consider connections and tensions between policy subjects

Policy Subject/s :

What works?

Scottish Planning Policy enshrines the importance of sustainable development and tackling climate change. We think it is very important to maintain or indeed strengthen these sections, and those that provide guidance on the protection of wildlife and habitats.

What doesn't work?

Onshore Oil and Gas Extraction

There is a growing body of evidence, in particular from the USA and Australia where the unconventional gas industry is considerably more developed, that there are inherent environmental and health risks associated with onshore unconventional gas extraction, including shale gas and coalbed methane. A key risk is in relation to our climate targets: unconventional gas extraction is energy intensive, and burning the gas contributes to emissions. Moreover, the impact of so-called 'fugitive emissions' of potent greenhouse gas methane from well heads has lead some scientists to argue that the climate impact of unconventional gas is greater that of coal.

We consider that the Scottish Government should undertake a thorough review of the full lifecycle environmental and health impacts of extracting unconventional gas; the impact that this industry will have on meeting our climate targets; the public acceptability of going down such a route; and the suitability of environmental regulations to deal with the technologies and methods involved, before the industry is allowed to develop further.

More specifically, we consider that the way in which the current SPP groups conventional and unconventional oil and gas extraction together, is unhelpful as there are important differences in the methods and scale of operations. Coalbed methane and shale gas operations require multiple wells – a single field can require over a hundred wells – yet the development of a field is phased, with planning permission applied for only as and when above ground structures are required. As it stands Local Authorities have to make decisions on individual planning applications making it very hard to properly assess the cumulative impacts, and leading to uncertainty for the local community and developers as to ultimately what extent a field will be developed. Further, because of the opaque relationship between the DECC licensing and field development process and the planning and regulatory framework in Scotland, it appears that controversial extraction techniques such as hydraulic fracturing, or 'fracking', can currently circumvent scrutiny by Local Authorities as part of the planning process and consequently, any community consultation on the use of such techniques.

We consider the issue needs urgent attention as the industry in Scotland is moving towards early

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commercialisation (for example Dart Energy's coalbed methane project at Letham Moss), and DECC are preparing to put the 14th round of onshore licenses out to tender under plans that could see a vast swathe of the central belt and fife under license for unconventional gas exploitation.

Why?

Whilst we need to understand the issues, we ask that comments focus on the possible solutions.

What changes and/or solutions could be made to the policy to focus it on sustainable economic growth and to emphasise place making?

While aspects of the SPP could be improved, and there is scope to strengthen the policy in relation to environmental protection, we are unclear as to the benefits of a review under the proposed terms.

We are concerned that a key aim of this review is to 'focus the policy on sustainable economic growth'. We reiterate our comments made as part of a broad coalition of civil society groups in response to the Government's National Performance Framework that economic growth is one of many means to the goal of flourishing, and not an end in itself, therefore should not form part of the Government's single purpose.

Our long term wellbeing and prosperity is underpinned by a broad range of factors including, very importantly, a healthy and safe environment. However, on a finite planet in a resource and carbon constrained world, it is both a strategic priority and moral duty to ensure that Scotland does not exceed its fair share of the earth's ecological resources – with respect to both intra and inter generational environmental justice – particularly given the historical ecological debt we owe.

Planning policy has a key role to play in achieving this, and therefore this review must recognise these constraints. While planning policy of course has to take account of economic policy, the pursuit of economic growth must not override environmental protection and improvement.