



RTPI

mediation of space · making of place

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Dear Antje

The Scottish Soil Framework

The Royal Town Planning Institute in Scotland is grateful for the opportunity to respond to the consultation on 'The Scottish Soil Framework,' which aims to achieve better soil protection and raising awareness of the multi-functionality of the soil resource.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and politically-neutral professional body committed to supporting devolved government in Scotland. The Institute has approximately 2100 members in Scotland, working across all sectors of central government, local government, government agencies, the voluntary sector, private consultancy, the development industry and academia.

Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.

The planning system has the potential to play an important role in protecting soil functions at a number of different levels. These include through Scottish planning policy statements, the protection of prime agricultural land, through policies relating to the development of renewable energy; and through strategic environmental assessments of plans, policies and programmes. More specifically such a role may also be seen in the application of environmental impact assessments; the encouragement of sustainable urban drainage schemes, land management that help to secure soils as carbon sinks and detailed design practices which reduce soil sealing.

The Institute therefore considers that further actions for the Scottish Soil Framework should include the adoption of a strong spatial dimension linked to the National Planning Framework, strategic and local development plans and supported by effective information and monitoring systems.

Detailed response to questions raised

1. I hope that the following points, arranged under the relevant question headings used in the consultation document are of assistance and are helpful in taking this work forward.

Question 1: The Government is proposing the Scottish Soils Framework in order to provide a policy overview and coordinating vision for future actions on soil protection. Do you agree this is desirable?

2. The Institute fully supports the need for a policy overview and co-ordinating vision for future actions on soil protection. Such work will provide valuable input into Scottish Planning Policies and the National Planning Framework; should guide work in response to the Climate Change Agenda at all levels; and should provide useful guidance and information for the assessment of impacts through SEA and EIA.

Question 2: Do you agree that the distinct Scottish soil resource requires protection?

3. The Institute agrees that the distinct Scottish soil resource requires protection; that high importance should be attributed to the environmental functions of carbon storage, biodiversity or water storage and filtration and that these functions should be recognised and taken into account in spatial planning.

Question 3: Do you agree with the analysis of the main soil functions presented here?

4. The Institute agrees with this analysis.

Question 4: Do you agree with our analysis of soils in the context of climate change?

5. The Institute agrees with the analysis of soils in the context of climate change. Issues relating to carbon-trade-offs when developing carbon-saving energy systems in landscapes that store large quantities of carbon and issues relating to the protection of prime agricultural land for increased food production need to be reflected in spatial plans at national, strategic and local levels.

Question 5: Do you agree with the analysis of the pressures and threats faced by Scottish soils? If not, which other threats need to be considered?

6. The Institute agrees with the analysis. The lack of baseline and trend data is noted as is the need to define and monitor a limited number of relevant indicators.

Question 6: Do you agree with our analysis of the current role of soils in existing policy framework?

7. The Institute considers that the analysis of the current role of soils in existing policy is accurate and emphasises the importance of soils within many policy areas. It is important to make sure that the revised British Standard for Topsoil (November 2007) is working and that the best practice guidance on soil use on construction sites (a draft code of practice is expected shortly) is enforced. Sustainable Urban Drainage Schemes (SUDS), which mimic as closely as possible natural drainage, should be promoted more strongly within the planning system,

Question 7: Where do significant gaps in soil protection exist?

8. The Institute considers that the development of more comprehensive information systems, guidance on potential threats and associated indicators and their use in SEA and EIA might assist in closing the gaps in soil protection.

Question 8: What are your views on the impact of climate change on the effectiveness of the existing soil protection policy framework?

9. The Institute considers that the impact of climate change on the effectiveness of existing soil protection policy will be to strengthen the need for such a policy, and to encourage the use of the precautionary principle.

Question 9: views are invited on the vision and aim

10. The Institute considers that the vision and aims provide a reasonable framework and the four areas of work provide a good starting point. However, a more detailed programme of work will need to be developed and could usefully address actions and awareness raising at local authority, community and individual levels.

Question 10: views are invited on the outcomes, to which specific activities contribute to. Should we be adding additional outcomes?

11. The Institute considers that outcomes will need to be measurable and programme specific. The current DEFRA consultation on the development of a draft code of practice on the sustainable use of soils on construction sites is noted.

Question 11: Views are invited on the four work areas under which future activities will be

12. The Institute agrees with the four work areas. However, further detail will be required e.g. on how to integrate soil protection into relevant policies. Related guidance and training will need to be addressed.

Question 12: Have the right activities been identified to contribute to achieving outcomes?

13. The Institute considers that activities related to construction might be included.

Question 14: What activities need to be prioritised?

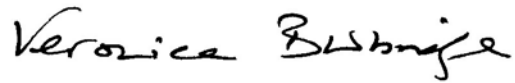
14. The Institute considers that priority should be given to activities associated with climate change including peat protection and flooding; to the protection of prime agricultural land, and to the development of relevant material for inclusion in strategic environmental assessment of related plans, policies and programme.

Question 15: What are your views on future stakeholder engagement?

15. While a Soil Focus Group would be useful, consideration also needs to be given to increased awareness at the local level. Local action might be linked to Local Biodiversity Action Plans; to guidance on actions such as composting, use of non-peat based products and stimulus of interest through provision of allotments etc; as well as through strategic and local development plans; and closely linked to the work of Regional Rural Development Forums.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification or further assistance, please do not hesitate to contact me at our Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, or email: veronica.burbridge@rpi.org.uk

Yours sincerely

A handwritten signature in black ink that reads "Veronica Burbridge". The signature is written in a cursive style with a large initial 'V' and a stylized 'B'.

National Director