

Response ID ANON-9GBF-3JQF-V

Submitted to Proposals to amend Scottish Government policy on the protection afforded to certain Ramsar features
Submitted on 2025-02-07 16:33:32

Question and background information

1 Do you agree that all Ramsar natural features should be given the same level of scrutiny when assessing potential effects of any new plan or project, by treating all natural features on Ramsar sites in the equivalent way to European sites for the purposes of the Habitats Regulations Appraisal process?

Yes

Please provide any comments in support of your response:

RTPI Scotland broadly supports the proposal to amend current policy to treat all Ramsar sites/natural features as European sites for the purposes of the Habitats Regulations Appraisal process. We acknowledge the potential conflicts and contradictions that can arise from the current two tier system, and we would support the amendment of policy that aligns with current policy practice in England and Wales.

Notwithstanding the above, we note the intention set out above to "take forward proposed amendments to NPF4 at the next relevant and applicable opportunity". This is very vague and it is unclear what mechanism is to be utilised to make this amendment to NPF4.

We are aware that plans are underway to introduce regulations to enable amendments to the Development Plan without triggering a full review. The Scottish Government consulted on the proposed regulations in May of last year.

It is unclear from the current consultation if the proposed changes to NPF4 would be undertaken as an individual amendment utilising the powers of the forthcoming regulations, or as a part of a broader package of changes that would then trigger a full review of NPF4. In our response to the Development Plan Amendment Regulations consultation, we voiced our concern that adopting a 50% trigger for a full review treats all amendments the same without considering the potential implications of those amendments. It was our view that the trigger for a full review of the NPF should not solely be based on the quantity of proposed changes, but also on the potential significance of those changes on the intent, interpretation and implementation of the NPF.

Whilst the Institute is supportive of policies that enhance the protection of sites of environmental significance, any proposed amendment to NPF4 will need to be taken forward in line with the amendment process set out in future regulations.

About you

What is your name?

Name:

Jenny Munro

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

The Royal Town Planning Institute Scotland

Further information about your organisation's response

Please add any additional context:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:

jenny.munro@rtpi.org.uk

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: