



# LEARNING LESSONS FROM LARGE-SCALE DEVELOPMENTS

**WWF Scotland**

**Report Prepared by Roger Crofts**

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**About the author:** Roger Crofts was responsible, as a civil servant, for the first ever sustainability statutory duty in 1991 and has been involved in sustainable development implementation and practice ever since. He has 30 years' experience of advising and deciding upon major developments, including during his time as CEO of SNH. As an environmental and management adviser he works on sustainability issues.

## INTRODUCTION

1. Over the past thirty years there have been many large-scale developments in Scotland covering many locations, engaging in many economic sectors and having a variety of effects on local and national economies, communities and the environment. This paper assesses the lessons learned and sets out recommendations for improvements in decision-making systems.

2. The assessment is based on the author's personal experience as a public administrator in advice and decision-making on large-scale developments over the last three decades. It seeks to be as objective as possible. It is written to stimulate debate in order to achieve improvements in the decision-making processes and mechanisms and, ultimately, to ensure that widespread social, economic and environmental benefits accrue from large-scale developments.

3. There are a number of reasons for the review. First, lessons learnt frequently go undocumented and are not used sufficiently to inform improvements in decision-making processes. Second, there appear to be many characteristics in common between different types of large-scale development. Third, and of greater immediacy, is the Scottish Executive's reviews of different elements of the planning system (for example, consultation on Public Local Inquiries and the development of 'A spatial planning framework for Scotland' up to 2025) and the commitment to legislate on the introduction of Strategic Environmental Assessment. Fourth, there is the wider context of the challenge to make sustainable development work in practice by ensuring that its three elements - social, economic and environmental - are achieved in an integrated and coordinated manner which bring benefits to society, overcomes social injustice and uses natural resources in an environmentally sustainable way.

4. There remains substantial polarity of view between the parties considering the effects of large-scale developments. Mechanisms for conflict resolution are neither well established nor widely used and more adversarial approaches remain the order of the day. This approach does not necessarily result in the most efficient use of public and private resources, delays decisions and sterilises action.

5. In this paper, the premise is that many large-scale developments have brought considerable economic benefits to the host areas and to Scotland as a whole through the creation of jobs, generation of income, and development of industrial infrastructure. However, the social, cultural and environmental effects have often been inadequately considered. The claimed benefits for local communities have not usually been achieved and environmental damage has been significant. Large-scale developments will continue to be proposed, although it is difficult to predict the technologies, timescales and location needs for the longer term. There are many expected benefits which can accrue from their rigorous planning and development. In addition, the decision-making system, based on the town and country planning system, has been used reasonably effectively but improvements in the formal mechanisms and in the formal guidance should be considered.

6. Following a brief definition of the types of large-scale development, the paper focuses, first on the characteristics of these developments from the development perspective, second on the characteristics of the decision-making processes, third on the implications of sustainable development and, fourth, on the implications of strategic environmental assessment. In all cases, lessons to be learned are identified and recommendations for future best practice are made.

#### Types of large-scale developments

7. This report does not provide a detailed analysis of each of the types of large-scale development which have occurred in Scotland in recent decades. Rather, it draws lessons from experience with a range of developments types. The following categories can be identified:

- (1) widespread and large-scale developments such as onshore facilities for the exploration and extraction of North Sea oil and gas, infrastructure for aquaculture in the marine and freshwater environments, onshore wind farms, and the planting, felling and restocking of commercial forestry plantations;
- (2) single large-scale developments with significant economic, social and environmental implications such as smelters, wood processing factories, quarries and ski developments; and
- (3) extensive projects for improving transport links, particularly roads and bridges

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#### CHARACTERISTICS OF LARGE-SCALE DEVELOPMENTS AND LESSONS FOR THE FUTURE

8. There are a number of characteristics of large-scale developments themselves. Also, the developers and their institutional supporters in the financial and public sectors recognise that government and its agencies are often the developer or driver of development. A number of lessons can be learned and recommendations are made for consideration by decision-making authorities.

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#### Market and profit driven

9. Inevitably the major driving forces for large-scale development are, financial viability and profitability linked to a market opportunity. This is the case irrespective of whether the project is government or developer driven. Businesses wish to undertake the development where decision making has three characteristics.

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10. There is a **minimum of intervention** from third parties, so that the opportunity for third party intervention through the planning system and specifically through the PLI mechanism is seen as an intrusive, albeit necessary, imposition.

11. There are **minimum delays** in gaining necessary approvals and appropriate financial support. Decisions appear to take too long for the greatest financial and economic benefit to be achieved. Many of the large-scale developments which have been proposed and/or have occurred in Scotland have happened very quickly and there has not been adequate preparation by decision-making authorities to meet the decision needs of developers.

12. There are **minimal restrictions and maximum flexibility** for the developer/operator on the activity and its further development. This usually means the ability to expand, either on the site or to other sites, to change the nature of the activities, and to have an opportunity to change some of the original specification in the light of market demand. Experience shows that developers are prepared

to accept restrictions and to lose flexibility in order for the development to go ahead. The issue is, therefore, what agreement can be reached between the public interest and the developer interest.

**Lesson 1:** The market demands speed in decision-making and minimal interference. A balance has to be struck between the public interest and allowing the development to be viable, profitable and have a strong chance of long-term operation. The public interest is not always accepted by opponents of development as being well represented by public authorities, particularly when public authorities are involved in delivering the development.

**Recommendation 1:** Decision-making authorities should identify all relevant information needed for making decisions. The developer should ensure that this is provided at the time of application to decision-making authorities and other relevant parties.

**Lesson 2:** The developer knows where the location of the development should be from financial and wider business perspectives and is often unwilling to consider alternatives. The planning system has traditionally reviewed the proposals brought forward rather than consider a range of alternatives.

**Recommendation 2:** The practice that only one site/location is proposed by developers should be reconsidered for large-scale developments, as is permitted under planning law and can be accommodated in Strategic Environmental Assessment.

**Lesson 3:** The developer seeks flexibility to allow changes in the light of market forces (profitability, competition etc) and does not want to be tied down to conditions and other restrictions.

**Recommendation 3:** Conditions should continue to be placed on development as part of the approval package. They should be tested for their potential effects on profitability and viability of the development, on their potential benefit to communities, and for the practicality of their enforcement by decision-making authorities.

Policy and politically driven development

13. Over the period of this review, government and its agencies have taken the lead in driving forward certain large-scale developments - for example, the Fort William pulp mill and the Invergordon smelter - as part of rural economic development strategies of the 1960s, and, for example, the Hyundai microprocessor plant in Dunfermline and the various road schemes such as the M77 development and the M74 extension in more recent times.

14. Government development agencies have not always been sensitive to factors beyond economic development, particularly the effects on local communities and on the environment. Also, they have not always been effective in judging the business requirements and the technology available and not always been good at judging the public mood, particularly in relation to the need for development and alternative ways of meeting that need.

**Lesson 4:** Developments led by government often do not take sufficient account of financial viability and business sense, and too often ignore community impact and environmental damage.

**Recommendation 4:** Government must ensure that all considerations are fully taken into account in government-led projects and that transparency of information sources and decision-making processes is achieved. The use of Environmental Assessment and, in future, the use of Strategic Environmental Assessment, should aid this process.

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## Technology rules

15. Many developments are dependent on the use of tried and tested technology or new technology, either of which can provide the developer with a competitive advantage in the market place. Often developers claim that they cannot make changes to accommodate other factors, such as community interests or biodiversity conservation, as technology is not flexible and they have chosen the only option which suits their commercial needs and the site's requirements. Experience shows that, when challenged with objective analysis, changes can be made which do not appear to undermine the financial viability or the profitability of the development, e.g. placing wind turbines below the hilltop and into the forest. At times, it is likely that the type of technology was not adequately assessed by development authorities at the time to ensure viability and profitability, eg Invergordon smelter and Corpach pulp mill.

**Lesson 5:** Decision makers and their advisers and third parties, all have difficulty in challenging developers' views of the current technology and its site and location requirements, and also have difficulty in predicting the likely future technologies and their location and other demands.

**Recommendation 5a:** Developers should be asked to provide an evaluation in layman's language of the technology options and the reasons for the choice made.

**Recommendation 5b:** In the case of new technologies, decision-making authorities should undertake independent assessments of the technology proposed and its location and other requirements.

## Dependent on the use of natural resources

16. Many proposed developments are reliant on the use of a natural resource, such as oil or timber, for extraction and transformation into products which the market seeks or for the use of a natural resource as a medium for development, such as deep water for oil platform fabrication yards, long snow-lie for skiing development, and sheltered water bodies with high flushing rates for aquaculture. Developers undertake, or have undertaken for them, assessments in the context of the profitability of the proposals, but the quality of these assessments is variable and is rarely sufficient to allow decision makers to make an informed judgement. There is no independent scrutiny of environmental assessments formally built into the system. The quality of the assessments is not formally evaluated and the assessors are not formally accredited. Reliance is usually placed on statutory agencies and third parties undertaking their own appraisals but these appraisals have no formal role in the decision-making process. In the assessments undertaken on behalf of developers, the view is often taken that the carrying capacity of the environment is infinite and that loadings on environmental systems from the development will not be problematic.

**Lesson 6:** Giving developers responsibility for undertaking their own assessments of the environmental and other effects of their proposal results in a lack of quality control and greater effort by authorities.

**Recommendation 6a:** All assessments should be undertaken independently of the developer, by assessors whose credentials have been scrutinised and approved for the purpose and with payment for the assessment provided by the developer to the planning authority.

**Recommendation 6b:** Assessment of the effects on the environment should always take into account short and long term effects and direct, indirect and cumulative effects on individual components, such as key species, and on the functionality and capacity of affected environmental systems and processes, such as water courses.

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No or limited developer responsibility for dealing with wider consequences

17. Large-scale developments make demands on labour markets and encourage movement of labour. There are consequential demands for housing and other social infrastructure. Inevitably, large-scale developments also place demands on the transport infrastructure. In the majority of cases the public authorities are expected to pay most of the costs unless developers can see a financial advantage in making new infrastructure provision. Developers have made greater efforts to provide resources for social facilities in recent times, but they are small in relation either to the investment in the development(s) or in its profitability.

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**Lesson 7:** Offers of financial support for community benefit are often made but (with a few notable exceptions, such as Shetland Islands Council in respect of oil developments), communities and their support systems have lacked the capacity to achieve a deal which is in proportion to the investment in and profits from the development.

**Recommendation 7a:** The capacity of communities to negotiate should be improved through training etc (see below paragraph 26, Lesson 14 and Recommendation 14).

**Recommendation 7b:** A proportion of the investment should be automatically set aside and invested for community benefit. The level should be determined by the decision-making authorities following consultation with the developers and independent advisors.

18. There is now evidence that some companies are taking their Corporate Social Responsibilities (CSR) seriously in planning large-scale development. Shareholders are keen to ensure that CSR is another indicator of company success along side profitability.

#### CHARACTERISTICS OF DECISION MAKING ON LARGE-SCALE DEVELOPMENTS

19. There is a range of issues which decision-making authorities need to consider. Performance to date has been variable in relation to specific types of development and in relation to the issues identified. Again, lessons are identified and recommendations for improvement in decision-making are made.

Decision-making authorities taken by surprise

20. Large-scale developments usually take the decision-making system by surprise and expose a lack of preparedness, despite the public sector often being party to developments or seeking to stimulate developments. Often the type of development has not been experienced often before, neither has the scale and proposed distribution of facilities especially in remoter parts of the Scotland, nor has the technology proposed been used in Scotland before. The obvious examples are onshore infrastructure for North Sea oil and gas development and the development of offshore facilities for aquaculture. The proposed 'A spatial planning framework for Scotland' by the Chief Planner of the Scottish Executive with a time horizon of 2025 is a potentially valuable approach, provided that action is taken to implement this far-sighted proposal. There is guidance in the Scottish Executive's Planning Policy documents to local authorities to look ahead to identify locations and sites for new development, but there is little evidence of a more far-sighted approach to identify new types of activity and the demands they are likely to place on communities and on the natural environment. History suggests this would be beneficial.

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**Lesson 8:** Greater preparation is needed to assess possible types of large-scale development and their site, location and other requirements.

**Recommendation 8:** Decision-making authorities should routinely undertake horizon-scanning exercises in relation to development possibilities and the types of site and location requirements of the key technologies.

Lack of strategic plans to cope with new large-scale developments

21. There are now many strategic planning frameworks to deal with large-scale developments, both nationally and at local authority level. However, history shows that many of these have been drawn up after the key decisions on individual sites have had to be made. This was the case with, for instance, North Sea oil and gas onshore infrastructure, marine aquaculture, large-scale afforestation, onshore wind farms, and skiing development. As a result, at the formative stage in the handling of large-scale development proposals, strategic plans were not always available with clearly articulated objectives to guide decision makers, despite the practice of structure planning for the last 30 years.

**Lesson 9:** Strategic plans for guiding effective and efficient decision-making on large-scale developments both aid the developer in achieving quicker decisions and guide the decision-making authorities to achieving better outcomes for the public interest.

**Recommendation 9:** As a follow up to the horizon-scanning exercise at Recommendation 8, decision-making authorities should draw up strategic plans to guide their decision makers and aid developers. The strategic plans should set out the desired aims and objectives to be achieved from different types of development and identify those factors which will specifically be taken into account in decision-making and those issues where flexibility is likely to be limited.

Lack of spatial strategy to guide decision-makers and developers

22. There is rarely a spatial strategy to guide decision makers and developers where it is most likely that, subject to proper scrutiny of detailed proposals, a development will be permitted. Government enterprise and industrial development ministries tend to resist any such guidance on the grounds that it reduces the options available to developers. This is a spurious argument as there is little point in wasting public money and developer time in considering those locations/sites which are unlikely to be capable of approval for social and/or environmental reasons. Some argue that this is the case currently with onshore wind farm development, with a plethora of applications being submitted in any one geographical area in the hope of obtaining permission for at least some of them, because there is no clear guidance available from decision-making authorities on locations likely to be favoured, nor those unlikely to be favoured. Those spatial strategies which have been developed, have often been post-hoc rationalisations after the majority of development applications have been approved, e.g. Coastal Planning Guidelines for North Sea oil and gas developments after all oil platform fabrication yards proposals had been determined and location guidance produced for marine fish farming after the majority of sites had been given leases.

**Lesson 10:** Lack of spatial strategies to guide development and to aid decision-makers has increased inefficiency in decision making, and cost developers and decision makers unnecessary time and money.

**Recommendation 10:** For all large-scale developments, public authorities should work together to identify areas with various degrees of sensitivity for particular types of development. Spatial strategies should differentiate between areas with a strong presumption in favour of development, from those with a strong presumption against, and from those where the position is broadly neutral.

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Spatial frameworks should be mandatory for large-scale developments, such as transport, energy production, forestry, aquaculture, and large industrial processing.

Lack of coherence between decision-making authorities

23. The town and country planning system is the key decision-making system, but there are many other regulations and approval mechanisms for large-scale developments, for example, waste disposal, wildlife, and health and safety. In addition, there are other approval mechanisms to regulate the technical aspects of development which are the responsibility of government enterprise and industrial development ministries, such as electricity generation stations and pipeline transmission systems. There are other consequences of development which need to be taken into account, for example, the effects on the health of citizens, such as proximity to telecommunications masts, and to incinerators. There are often conflicts between the different decision makers, e.g. between environmental and development responsibilities in the public sector. There is also the presumption that the statutory planning system is a development-enabling system rather than a neutral system to ensure that all appropriate aspects are fully taken into account before decisions are taken.

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**Lesson 11:** There are many different authorities with roles in the decision-making process. This results in confusion for the developers and turf wars between the bodies.

**Recommendation 11:** All decision-making authorities must agree formally to work together effectively to ensure that proper scrutiny of proposals has been undertaken and that an integrated approach, in the context of sustainable development, (see below - paragraphs 30 and 31), has been taken. Agreements, in the form of memoranda of understanding and codes of best practice, are recommended with support from the Scottish Executive. As a last resort, a statutory duty should be placed on all public bodies to ensure cooperative working.

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Decision making is delegated and ad hoc

24. Decision-making tends to be *ad hoc* and taken at the local level. It is perfectly reasonable for decisions to be devolved in terms of efficiency and effectiveness of the operation, but it is essential that decisions are taken within the context of, and with adherence to, agreed frameworks, i.e. those in Recommendations 8-10.

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**Lesson 12:** Delegation of decisions to the local level is supported provided that decision-makers undertake the role with responsibility in relation to wider issues of the public interest.

**Recommendation 12:** Decisions taken which do not accord with agreed strategies and other formal frameworks must be referred to higher authority, with the presumption that the decision will be reversed.

Decision-making does not take account of cumulative effects

25. The cumulative effects of development on environmental systems, on the landscape quality and character of the receiving area, on the transport and social infrastructure, and on community well-being are rarely taken into account before decisions are taken. Examples are the afforestation of large areas of Dumfries and Galloway, and Kintyre without formal consideration of the cumulative effects on the landscape, and the approval of large-scale industrial developments for oil and gas without considering the social consequences for the host communities in Shetland and in Easter Ross.



**Lesson 13:** The cumulative effects of large-scale development on the receiving area need to be considered, particularly in relation to the effect on the quality of life of the community, both natural and human.

**Recommendation 13:** In the context of the strategic approach recommended earlier (see Recommendations 8-10), limits to the capacity of receiving areas should be identified, particularly in relation to quality of life indicators, such as effect on human communities, and effects on landscape, and on environmental systems.

Third parties do not have adequate capacity for engagement

26. The lack of capacity for third parties to engage effectively in the decision-making process remains an outstanding issue. This is particularly the case with local communities, few of which have either the knowledge and skills or the financial and other resources to be able to scrutinise adequately the proposals, and to make representations through the various stages of the decision-making process, including representation at Public Local Inquiries. There has been much debate about the expenses of legitimate third parties being covered by public sector funds in Public Local Inquiries but no action has been taken. The recent Scottish Executive consultation paper on PLIs neatly ducks this issue.

**Lesson 14:** Third parties have a legitimate role in scrutinising development applications and in scrutinising the effectiveness of the decision-making process for their interests. The capacity of these parties is limited and little or no effort has been made to help them increase their capacity to participate effectively and in a resource-efficient manner.

**Recommendation 14:** The Scottish Executive, as part of its review of the PLI system and also as part of building social justice into the planning system, should make formal proposals on capacity building and remuneration of the costs of third parties in planning decisions, with preference given to resolving social injustices.

Infrastructure consequences are not sufficiently taken into account

27. Before decisions are taken, it is essential that all of the actual and potential infrastructure consequences are taken into account in the decision-making process. All large-scale developments have requirements for the provision of new or additional infrastructure. In remoter areas, this can be significant with the need to house incoming workers and their families and to provide associated social, educational, retail and health care facilities, for example, in relation to pulp and paper developments in the Fort William area. In addition, most large-scale developments place additional demands on the transport infrastructure of the host area, for example, out of town retail and office developments. Scottish Executive planning policy clearly identifies the need to consider the linkages between developments and transport, but the policy is lacking on guidance on other aspects of infrastructure support and on timescales for this type of planning. There is also the question of who pays for the infrastructure. The traditional approach, for the most part, has been for the public sector to pay, but more innovative solutions are now being used, such as public private partnerships. The payment issue needs to be resolved before consents are given for developments, with a presumption in favour of some financial support from developer, perhaps in the form of a levy.

**Lesson 15:** Failure to take account of all infrastructure requirements before decisions are made means that the totality of the development package is not planned in a coherent manner, the provision of key elements is out of phase, and the overall costs to the public purse are not known.

**Recommendation 15:** Decision-making authorities must assess formally all of the likely infrastructure implications and requirements of the development and make necessary decisions on

provision as part of the development package, including agreeing a proportion of the payment from the developer.

Evaluation systems are not in place

28. Systems to evaluate the effectiveness of decisions and of the development itself, particularly where it has been supported by public funds, are not invariably used. Lessons are therefore not learned and practice not improved.

**Lesson 16:** There are systems to evaluate the economic benefits and there is an enforcement system in place for monitoring compliance with planning conditions, but there are rarely evaluations of the overall benefits and costs of large-scale developments.

**Recommendation 16:** Evaluation of the benefits and costs, financial and otherwise, on the economy, communities, and environment of the host areas should be undertaken, as a matter of course. This should be independent of the developer, but paid for by the developer.

Design and build solutions have downsides

29. Design and build solutions have been adopted on the grounds that they are cheaper, quicker and provide greater flexibility. They have been used for various road and bridge schemes, for example, the A86 Laggan road and the Skye Bridge. There are a number of downsides. Public authorities with a legitimate interest have to put much greater resources into working with the developers throughout the project. There are often communication difficulties between the developers and the contractors, and between these two parties and approval bodies, and the end product is not always satisfactory to the range of public interests as compromises have had to be made at speed during the development.

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**Lesson 17:** Design and build can be costly in manpower to scrutinise the activity: poor communication means that it is difficult for mistakes to be rectified and the end result might not be as publicly beneficial.

**Recommendation 17:** decision-making authorities should review experience on design and build projects with a view to removing the ineffective and inefficient elements of the approach.

#### APPLYING SUSTAINABLE DEVELOPMENT TESTS TO LARGE-SCALE DEVELOPMENTS

30. There is now a new challenge in scrutinising applications for large-scale development: sustainable development tests. This does not mean that, provided the development is sustainable according to the developer and the government enterprise agencies, then it passes the test. Financial sustainability, or more accurately termed financial viability, is for the developer to demonstrate and for the public sector support agencies to scrutinise. Sustainability tests mean scrutiny of the costs and benefits in terms of achieving gains for the community in the area of the development and further field, and in terms of having no significant long-term damaging effects on environmental systems and processes, and on the species and habitats which are dependent on them. In terms of the Scottish Executive's approach to sustainable development, this means a host of factors which can be gleaned from scrutiny of departmental plans. From work undertaken by Ian Thomson and Roger Crofts for WWF Scotland, 46 factors have been identified: 28 environmental, 8 business and 10 social, which provide a starting point for sustainability assessment of large-scale developments. These are listed in the Annex. Not all of these are necessarily applicable to the scrutiny of large-scale developments, but the vast majority are.

31. There is no evidence to suggest that formal scrutiny of large-scale development proposals takes into account either the high level sustainable development factors, such as social justice and maintenance of environmental systems, never mind the more detailed evaluation of the factors listed in the table annexed.

**Lesson 18:** Formal assessment of all large-scale developments, of whatever type and nature (see definitions in paragraph 7), in terms of their benefits to sustainable development, should now be an obligatory part of the decision-making system.

**Recommendation 18a:** All decision-making authorities should undertake formal assessment of sustainable development criteria before any decisions are taken.

**Recommendation 18b:** The town and country planning system should be refocused so that it is a component of the implementation of sustainable development with full account taken of social, economic and environmental aspects of sustainable development in a coherent and integrated matter at strategic, plan making and development control levels of the system.

#### APPLYING STRATEGIC ENVIRONMENTAL ASSESSMENT TO LARGE-SCALE DEVELOPMENTS

32. The proposed implementation of the EU Directive on Strategic Environmental Assessment in Scotland will improve decision-making if the EC guidance is followed. There is a commitment in 'A Partnership for a Better Scotland: Partnership Agreement', May 2003: 'we will legislate to introduce strategic environmental assessment to ensure that the full environmental impacts of all new strategies, programmes and plans developed by the public sector are properly considered'. The Scottish Executive's proposals have been subject to consultation recently. On the one hand, the proposals seem to be more limited than the EC guidance and restricted to new programmes etc, which means that most activity will continue without this level of scrutiny. On the other hand, the proposals do go beyond the EC guidance by including strategies, as well as programmes and plans. This is a welcome extension.

33. The EC guidance implies scrutiny of proposals at a much earlier stage: in the development of policies, plans, programmes and groups of projects. The scrutiny includes assessment of project alternatives, assessment of cumulative effects of developments, assessment of both sectoral and spatial aspects, and integration of environmental issues. It will also be a transparent process and involve the public.

**Lesson 19:** SEA is a valuable tool to assess environmental effects at the appropriate early stage in the planning process. Arguments about how to apply it should not get in the way of its use in Scotland.

**Recommendation 19:** Scottish Executive to bring forward proposals for legislation and associated technical guidance on implementation SEA in 2004-05 session of Parliament covering all aspects of the EC legislation and guidance, and also including application to strategies.

#### OVERALL CONCLUSIONS

34. Decision-making systems needs to be more effective in stimulating large-scale development and, at same time, in achieving social justice and environmental security. Overall, a change of approach is required **from** present practice **to** improved approaches.

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From	To
Short-term, uncoordinated and inconsistent approaches from different elements of decision-making process	Clear, long term and strategic view and ways of measuring achievement
Planning after activities started	More horizon scanning and forward planning
Reticence to identify go/might go/no go areas	Indicative strategies and location guidance at a variety of appropriate spatial scales
Separate decision-making systems	Integrated and coordinated approaches between the different elements of decision-making process, especially between T&C planning and other systems
Failure to consider alternatives	Open and objective way of assessing alternatives: locations, scale, and type of development
Limited and late assessment of all implications	Early objective assessment of all implications - social, environmental and infrastructure - in coordinated manner
Restriction of planning system not to consider those aspects beyond its authority	More broad-based decision-making system, including legitimate consideration and decision on all issues in coherent and coordinated manner, taking into account key sustainable development issues
Dealing with the proposition from developer's standpoint	Ability to identify best outcomes for developer and society within context of maintaining quality and functioning of natural environment and achieving social justice
Ad hoc decisions bearing little or no relation to policies and strategies	Ability to make decisions which concur with overall strategic frameworks
Multiplicity of conditions with little or no enforcement effort or action	Enforceable conditions with appropriate penalties for non-compliance

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35. This is ample opportunity to review the lessons and recommendations in this report as part of the current reviews of the planning system, the development and implementation of Strategic Environmental Assessment, and to improve the implementation of Environmental Impact Assessments.

ANNEX: ATTRIBUTES OF THE THREE ELEMENTS OF SUSTAINABLE DEVELOPMENT  
FOR CONSIDERATION IN PROJECT EVALUATION

<b>Environmental</b>	<b>Business</b>	<b>Social</b>
Protect Natural Environment	Enhance productivity	Infrastructure investment
Protect Water	Promote Sustainable Development	Sustainability awareness training, education
Biodiversity	Networking, collaboration	Visual, aesthetic impact
Protect Wildlife	Financial Incentives /sanctions	Economic redistribution
Enforce Environmental Protection	Research & Development new/cleaner technology	Reduce waste of human capital
Sustainable Land Use	Eco-design, products and services	Effective citizenship
Increase recycling	Sustainability as business opportunity	Social inclusion
Reduce waste	Change regulations	Social justice
Reduce water use		Safer, fairer Scotland
Reduce air emissions		Local Purchasing
Staff travel initiatives		
Reduce travel		
Reduce voc, chemical use		
Videolinks		
LPG vehicles		
IT based solutions		
Reduce energy from non-renewable		
Renewable energy		
EMS / Certification schemes		
Centres of eco-experts		
Social / Environmental Impact Studies		
Eco-purchasing		
Integration across agencies		
Life cycle thinking		
Buildings & Estate Management		
Locating new offices/centres		
New build to higher eco-standards		
Refurbish and repair rather than new build		