

Scottish Government National Planning Framework 3 Main Issues Report for Consultation

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A LOW CARBON PLACE

1 How can NPF3 support the transition to a largely decarbonised heat sector?

Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

Comment:

The strategic direction and recommendations set out support the transition to a decarbonised heat sector (e.g. paragraphs 2.10 to 2.13 on page 10).

The role for NPF3 may be in providing more clarity on how to address issues of geographic disparities between resources (e.g. biomass) and sinks (end users) of heating schemes. For example, does the geographic distribution of capacity of district heating schemes align with improvements in building efficiency? Further, although the demand for heat can be expected to reduce due to improved efficiency in domestic properties there is no estimate of what rate of change might be achievable at current levels of change in housing stock and uptake of efficiency measures.

2 How should we provide spatial guidance for onshore wind?

Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government's proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

Is spatial guidance for onshore wind best left to local authorities?

Comment:

The geographic distribution of local authorities does not follow the geographic distribution of aspects of natural heritage such as areas designated for landscape reasons, and wildland. Paragraph 2.16 links cumulative impacts to that of capacity for wind farm development in an area. Such

impacts do not adhere to local authority boundaries, so approaches and priorities at the local authority level need not be shared by adjacent authorities.

Therefore, we are supportive of the increase in use of information of relevance at a national level to contribute to consistency in factors influencing spatial guidance of which the work by SNH on mapping wildland is an important aspect.

However, if landscape is recognised as one of the key aspects to inform discussions over onshore wind turbines then consideration should be given to the European Landscape Convention (EC, 2000), which is ratified by the UK, which notes that ‘the landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas.’

Therefore, we suggest that:

- (i) reference is made to the importance of considering all landscapes;
- (ii) support be given to providing a robust dataset of wind turbine developments, expanding that currently made available by SNH. This could be used to track the installation of developments at a national level with respect to their cumulative visibility and thus contribution to all landscapes, and their distribution across different types of land (e.g. soils, Land Capability for Agriculture/Forestry, and Landscape Character Assessment).

Paragraph 2.20 The wording could be modified from ‘... the visible lack of modern man-made structures,’ to ‘... the lack of visibility of modern man-made structures,’.

Paragraph 2.32 We welcome the reference to the draft Scottish Planning Policy providing opportunity to take account of the role of community benefits within planning decision-making.

3 How can onshore planning best support aspirations for offshore renewable energy?

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

Comment:

The requirements of on-shore infrastructure are linked to proposals for offshore developments, and should be recognised as such where projects are identified as national developments. However, some guidance should be considered to define those structures which might be considered as part of a national development as the links may appear tenuous when different parts of the development are considerable distances apart.

4 How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focussing baseload generation on existing sites?

No comment

5 What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?

No Comment

6 Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

Comment:

The emerging spatial strategy covers the key requirements for support of the National Renewables Infrastructure Plan. The inclusion of reference to the importance of education and training, and research and development in Paragraph 2.66 is welcome. However, reference could be made to the Scottish research and higher education sector as a whole, and the support it provides in providing skills to meet the needs of the businesses referred to in Paragraph 2.65, and aim set out in Paragraph 2.57.

A NATURAL PLACE TO INVEST

7 Can NPF3 do more to support sustainable use of our environmental assets?

Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

Comment:

We welcome Chapter 3 ('A Natural Place to Invest'). We are supportive of the approach set out in Paragraph 3.5, and the inclusion of maps that demonstrate the vital role that soils play in food production and its direct support to Scotland's important food and drink sector (Paragraph 3.7) climate change mitigation (Paragraph 3.9) and sustainable economic growth (Paragraph 3.10).

The development of green infrastructure as a framework for delivering multiple benefits, both environmental and economic, and national ecological networks have a lot to offer in terms of enhancing Scotland's environment and natural resources. We agree that there is no requirement for specific identification of such features as national developments, however there are risks that changes in land use may compromise the achievement of what is described as '... an excellent long-term aspiration.'

We have become aware that the suite of 'services' that we demand from our land (and a number of which will be subject to planning) will be 'squeezed' into a relatively small area of land. High quality agricultural land (prime land) is protected primarily for food production whilst large areas of extensively managed land are designated nature conservation sites, are important carbon stores or are biologically or physically unsuited to change. This observation does not directly address Question 7, but planning should recognise that the actions described within it, for example, woodland expansion, will by necessity be spatially constrained. The link below provides some more detail.

www.hutton.ac.uk/sites/default/files/files/events/Squeezed-Middle-discussion-paper.pdf

The following paper also sets out some of the issues arising with respect to achieving a national ecological network, in particular the potential for there to be key locations where the integrity of a network may be compromised by competing demands for land. The potential sensitivity of a network to other demands for land use can only be fully understood at national rather than regional or local levels, and so some reference acknowledging risks to such a network could be included in the NFP 3.

Reference: Gimona, A., Poggio, L., Brown, I. & Castellazzi, M. 2012. Woodland networks in a changing climate: Threats from land use change. *Biological Conservation* 149, 93-102.

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

Comment:

A more generic understanding of habitat diversity and quality at the national level would help understand the importance of selected projects or geographic areas, such as the Firth of Forth. The implementation of a strong network of habitats for nature conservation, as indicated under Question 7, would help how regionally significant developments can contribute to national priorities.

9 Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

Comment:

A national network of long distance routes merits consideration as a national development. As with other types of networks, it is only at a national level that their integrity can be recognised.

When considering 'new and improved links' consideration should be given to the quality of the long-distance paths and trails as well as their connectivity. The analysis of responses to the Land Reform Review Group call for evidence identifies issues of maintenance and signage on existing routes as requiring some attention.

In Paragraph 3.19, institutional experience suggests that there is also a need for improved conference facilities in Dundee.

10 Can NPF3 do more to support sustainable resource management?

Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

No Comment

A SUCCESSFUL, SUSTAINABLE PLACE

11 How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

Comment:

As noted in Paragraph 4.25, 'city and town centres provide a focus for investment, and opportunities to make use of existing infrastructure.' NPF3 could provide a short vision of the characteristics of urban centres of the future, linking to some of the aims of green infrastructure, consistent with the ambitions set out in Paragraphs 1.1, 1.2 and 1.3. This could include aspects of urban land use (e.g. trees in urban settings, providing places to improve well-being, cool urban areas, and absorb pollutants), and novel types of engineered ecosystems which link technology and ecology. Some Scottish companies are at the forefront of providing the design and implementation of such urban environments.

With respect to the question "How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?" the SG RESAS Strategic Research Programme is addressing issues of enhancing understanding of the reasons for differential economic performance across rural Scotland and linkages between social and economic outcomes, and showing how greater empowerment, through new governance mechanisms, can enable rural stakeholders to contribute more effectively to the Government's aim of shared and sustainable growth. Further information can be provided from the James Hutton Institute if requested.

12 How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

Comment:

We agree that the Central Scotland Green Network (CSGN) should be retained as a national development in NPF3. To our knowledge the CSGN is unique internationally as a planning priority. When its aims and nature of the partnership are presented outwith Scotland there is always considerable interest in the status of such an initiative. Therefore, it is an example of innovative thinking and leadership.

There is an opportunity for the CSGN to provide an emphasis which is slightly more on land use rather than on transport. This could enhance the contribution of central Scotland to delivery of the Land Use Strategy (e.g. Objective 3 of "Urban and rural communities better connected to the land, with more people enjoying the land and positively influencing land use"). It would also contribute to an objective of the "Climate Ready Scotland: Scottish Climate Change Adaptation Programme" and its Objective N3 described as "Greater recognition of the role of integrated land management in tackling climate change", involving many of the same partners as the CSGN.

The CSGN could provide a higher level of strategic interest in the formation of ecological networks and provides an opportunity to integrate plans for land use across a significant area of Scotland, such as: the projects of the GVC Green Network, the Helix and its zones, and the Lothians and Fife Green Network Partnership. It also covers landscapes which might be described as 'everyday' rather than iconic, which then aligns with aims of the European Landscape Convention. Stronger reference could be made with the vision in Paragraph 3.23 regarding the importance of canals and tourism.

13 How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

Comment:

NPF3 can have a role in highlighting where demand for housing and associated population growth may be in competition with other pressures on land use. In particular, it could include reference to future-proofing spatial plans relating to housing with respect to prospective changes in climate, increased frequency of extreme weather events.

A CONNECTED PLACE

14 How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

No Comment

15 Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

No Comment

16 How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?

Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as part of the longer-term spatial strategy?

No Comment

Strategic Environmental Assessment – Environmental Report

1 What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?

2 Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?

3 Taking into account the environmental effects set out in the report, what are your views on:

- a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
- b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
- c) The proposed suite of national developments to be included in the Proposed Framework?
- d) Alternative candidate national developments?
- e) The policies proposed for the Draft SPP?
- f) The key questions for consultees set out in the Draft SPP?

- 4 What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?**
- 5 How can the NPF and SPP be enhanced, to maximise their positive environmental effects?**
- 6 What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?**

Comment:

The SEA seems broadly to reflect the needs and opportunities within NPF3 and SPP, with a positive approach to understanding opportunities and not only constraints. Reference to use of an Ecosystems Approach/Ecosystem Services Framework (as advocated in the Land Use Strategy) could help better understand impacts and effects in a more integrated and comprehensive way. The inclusion of regional level assessments is also a very positive step that could help link more strongly with the local level at which planning and decision making is effectively implemented. A stronger tie with SEA results from the Land Use Strategy can also help obtain a greater and more complete overview of land use and regional systems in a more comprehensive and integrative way.

Equality Impact Assessment (EqIA)

In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

No Comment.

Business and Regulatory Impact Assessment (BRIA)

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

No Comment.