

National Planning Framework Main Issues Report

Comments of West Dunbartonshire Council

The structure of the document is welcomed, with the four strands of the vision clearly set out. The message of transition to a low carbon economy comes across very clearly, and perhaps stronger than economic growth which has a stronger position in the draft Scottish Planning Policy document. The spatial strategy under each of the strands of the vision is very clearly articulated in the opening section, and perhaps becomes less clear in the following sections.

There is a strong focus within the document on national development in the east and north of the country. Because of geography and the location of natural resources, this is, to a certain extent, understandable. But there should also be measures in the NPF to ensure that economic and other growth does not become imbalanced within Scotland as a result.

Little is said in the document about population change. Many areas face continuing depopulation, whilst others face growth which is placing pressure on housing markets. All areas have an aging population. The National Planning Framework should have something to say on these matters.

Whilst recognising this is a Main Issues Report, it is considered that the draft framework should be more spatial in focus identifying where things are to happen. By including significant general text there is a blurring of what should be a clear difference in purpose between NPF and Scottish Planning Policy. Greater clarity would be achieved by the NPF being purely about where national developments are to be located and highlighting the important planning issues it expects to be addressed in the SDPs and LDPs covering specific parts of the country.

No timescales are included within the document. There is no indication of what period NPF3 will cover, when the vision is for, or specific timelines for the national developments. However, it is recognised some of this information belongs in the Action Programme.

Many of the diagrams that are included are of little benefit and superfluous to the text. In terms of the aesthetics of the document they would be better replaced with photography as in NPF2.

Some projects, which in the grand scheme of things, are quite minor are referred to in the document e.g. @5.25 £0.5M for roadside viewing platforms and viewpoints, @ 4.25 & 4.29 £2M to bring empty properties into residential use.

The areas of co-ordinated action should be based around the SDP city-regions where relevant. 'Firth of Clyde' is an incongruous title for the area shown which stretches into Lanarkshire and beyond.

A low carbon place

It is recognised that moving towards a more sustainable and secure energy supply is important for Scotland's economy and environment, and rightly features prominently in the National Planning Framework. It is also recognised that many of the national developments associated with this are locationally specific. However, it is a concern that the west of Scotland features in such a limited way in the spatial strategy for a low carbon place. Whilst, perhaps down to geography, this should at least be recognised by the National Planning Framework and a strategy to address this be introduced.

Consultation Question 1

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

How 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?

NPF3 should highlight the importance of a renewable heat sector to the transition to a low carbon place. It could go further by embedding renewable heat within its vision for successful, sustainable places in Scotland, in particular those identified within Section 4 (including the national developments at Ravenscraig and Dundee) and where it can be derived from energy generating national developments. This would provide a spatial element.

Consultation Question 2

How can we provide better 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?

Spatial guidance for onshore wind is already set out in Scottish Planning Policy, and in more detail in the revised Scottish Planning Policy (consultation draft). It is difficult to provide a more detailed spatial framework for onshore wind at a national level as so many aspects require to be assessed on site. There may be a role for considering the results of regional capacity studies to develop an understanding of Scotland's potential for new wind power schemes in relation to set targets. However, interpretation of the spatial implications of these studies will be best undertaken at a local level. The re-powering of existing sites is also likely to be an issue in the next 15-20 years and the National Planning Framework or Scottish Planning Policy could say something about this issue.

The SNH mapping work would seem to be an obvious reference point to identify areas of wild land character.

It is noted that the NPF does not refer to the role of other onshore renewable energy technologies in achieving carbon-emissions reduction targets.

Consultation Question 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?

The onshore infrastructure requirements of the first offshore wind, wave and tidal projects should be identified as a national development. It would seem appropriate to focus infrastructure and connections on a limited number of locations so as to avoid a proliferation of coastal landfalls.

Consultation Question 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 focusing baseload generation on existing sites?

It is considered important that the National Planning Framework supports continuing baseload generation through the identification of thermal power sites as national developments. Equally important is supporting Scotland's role in developing carbon capture, and national development status for such infrastructure is also supported.

Consultation Question 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 international interconnector from Peterhead? What projects should be included?

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

It would be appropriate to update electricity grid enhancements as a national development, including the international interconnector at Peterhead. Ideally, national locational priorities for energy storage projects should be articulated by NPF3.

Consultation Question 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?

It is appropriate for the National Planning Framework to reflect the investment and land use requirements of the NRIP.

Consultation Question 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?

The identification of the Central Scotland Green network in NPF2 is an example of support of our environmental assets, which has, importantly, been backed by action and funding from the Government. The CSGNs inclusion in NPF2 has resulted in a higher profile for the CSGN and the green network concept generally. Its continuation as a National Development in NPF3 is supported.

Clarity of planning's role in woodland expansion, and peatland or habitat restoration would be welcomed, but beyond general support it is not clear what the spatial role of the NPF would be in relation to this.

It is not clear what the purpose of a National Ecological Network would be. If it is simply the collective identification of internationally and nationally protected sites, then, in effect, this already exists. Any identification of a national network would have to be supported by action and resources to improve and enhance the network. It is often locally protected sites that actually create an ecological network by joining dispersed national sites.

Consultation Question 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?

It is important for the NPF to highlight the sensitivity of environmental resources in areas affected by national developments. It would be appropriate for the NPF to identify high level mitigation measures.

Consultation Question 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?

The National Planning framework could identify nationally significant tourism resources. These could include the National Parks, the canal network and potentially the Antonine Wall.

This Council would support the identification of a national network of long distance routes. These could include the John Muir Trail, and routes along the Antonine Wall and the canal network.

Consultation Question 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?

It would be appropriate for NPF to offer guidance on strategic waste facilities. The economies of associated with modern waste management infrastructure require cross-authority co-operation on infrastructure. There is limited spatial guidance on waste available and no co-ordination of proposals for waste management facilities. Authorities are currently faced with speculative applications for facilities, implementation of which requires the winning of contracts, so there is no certainty as to where the waste to be treated is to come from. This uncertainty is of no benefit to the operators either.

The Metropolitan Glasgow Strategic Drainage Plan should be retained as a national development. It is an identifiable project, covering several local authority

areas and benefiting a significant proportion of Scotland's population and premises.

Consultation Question 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?

The National Planning Framework can stress the importance of our town and city centres to their communities and the economy of Scotland, supporting and strengthening the message of Scottish Planning Policy.

It should recognise the significant levels of vacant and derelict land in parts of the country, particularly the west of Scotland and advise a settlement strategy in these areas which promotes the development of vacant and derelict land.

The key growth sectors should be recognised by the National Planning Framework. As many of the energy-based national developments are location specific and based in the east and north of Scotland, a geographical balancing of Scotland's economy could be achieved by recognising the role for these key sectors in the west and south of Scotland.

Consultation Question 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?

The NPF could contribute to in some way to a greater awareness and better understanding of the links between health and land use planning as part of the prevention agenda. However, as a spatial document the role of the NPF is limited, and perhaps a Planning Advice Note on this matter would be useful to assist planning authorities to address this issue through Local Development Plans.

The Central Scotland Green Network should continue to be designated as a national development. Green networks are multi-functional, and establishment of priorities in the NPF could detract from this message. Instead priorities could be set through the bid criteria for the Central Scotland Green Network Fund. This would allow for priorities to be identified on a more regular basis. That said, green network enhancement of some long-term vacant and derelict sites should be promoted as an alternative solution to the repeated designation of some sites for development.

Consultation Question 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?**

Much of the Government's approach to planning for housing is rightly set out in Scottish Planning Policy. It is a matter best dealt with at city-region or local level, and there is not a spatial element to it at the national level. The National Planning Framework, being a spatial document could set out that different approaches to settlement strategies would be appropriate for different parts of the country. For example, suggesting a greater focus on previously developed land in the west of Scotland.

It is correct for the NPF not to identify any particular housing developments as national developments. Nor should it identify regional targets for housing, leaving this to the HNDA process.

Consultation Question 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?**

The NPF can contribute to decarbonising transport networks by supporting infrastructure projects that would reduce road use and ensuring that national developments can be sustainably accessed. It is not clear if the emerging spatial strategy is consistent with the aim of decarbonising transport; that message is not as strong as the message regarding the decarbonising of energy.

NPF3's support for electrical vehicles infrastructure (charging facilities), alternative lower emission fuels (rail and vehicle), ambition to significantly increase levels of everyday cycling and walking, and digital connectivity all contribute to decarbonising transport. In addition to this, continued improvements

to public transport will also help to reduce travel by the private car and reduce emissions.

The NPF should make a general commitment to the roll out of next generation broadband to those areas that do not have it.

It is difficult to think of how cycling and walking networks for everyday use could be identified spatially at a national spatial. This is a matter for local identification.

Consultation Question 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?

Consideration should be given to identifying some of the Infrastructure Investment Plan transport projects as national developments, particularly where these link to other national developments. Some are of national importance in their own right so should feature in the NPF and be given planning status.

Consultation Question 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 development 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 a part of the longer-term spatial strategy?

The growth of Glasgow airport, and other key airports including Inverness, should be identified as national developments and their role as hubs for economic development recognised by the NPF.

The high speed rail link to London should be retained as a national development, including a high-speed rail line between Glasgow and Edinburgh.