

# **Analysis of Responses to National Planning Framework 3 Consultation**

Craigforth with Planning Aid for Scotland

These Research Findings present a summary of the analysis of responses submitted to the public consultation in advance of preparation of a new National Planning Framework (NPF3). The NPF3 will set out a spatial strategy to guide development of the planning system and to help achieve the Government's ambitions over the next 20 to 30 years. The consultation invited views on a Main Issues Report and associated suite of documents. The four themes covered in the Main Issues Report were; A Low Carbon Place; A Natural Place to Invest; A Successful Sustainable Place; and A Connected Place.

## **Main Findings**

- A number of respondents, including some Public Body, Local Authority, Professional Body and Third Sector Respondents, supported the general 'direction of travel' suggested by the Main Issues Report. Some particularly commended the ambition of the plans.
- Many respondents raised issues they would like to see addressed, or changes they would like to see made, in the final NPF3. In some cases, these included suggested changes to specific proposals.
- Business respondents operating in sectors which are particularly relevant to NPF3 tended to be broadly supportive. However, many felt that the final NPF3 could go further in supporting or promoting their sector than the Main Issues Report implies.
- Other responses included calls for NPF3 to offer more or less support for a particular policy direction or sector, industry or specific type of approach or initiative. Many responses also contained calls for greater recognition of, or to offer more support for, particular locations or specific initiatives.
- In terms of issues of concern, a significant number of respondents, including many individuals, focused either on the impact of onshore wind developments, or on planned developments in the Grangemouth area.
- Where NPF3 sits within the wider Scottish Planning System, along with how it relates to the Scottish Planning Policy (SPP) and a range of other national strategies, was a common theme to emerge from the analysis. In terms of the particular contribution NPF3 should make, views included that it be aspirational whilst still addressing current challenges, and should provide the right conditions to ensure that national targets can be delivered.

## Introduction

1. These Research Findings present a summary of the key issues that emerged from the analysis of responses submitted to the public consultation in advance of preparation of a new National Planning Framework (NPF3). The NPF3 will set out a spatial strategy to guide development of the planning system and to help achieve the Government's ambitions over the next 20 to 30 years.
2. The consultation ran from 30<sup>th</sup> April 2013 to 23rd July 2013 and invited views on a Main Issues Report and associated suite of documents. The four themes covered in the Main Issues Report were: A Low Carbon Place; A Natural Place to Invest; A Successful Sustainable Place; and A Connected Place.
3. A total of 555 responses were received. After a small number of duplicate responses had been removed, 549 responses were included within the analysis. The majority of responses were submitted by individual members of the public, including 147 campaign responses about the CAPTAIN Clean Energy Project at Grangemouth. Responses were also received from all of Scotland's 32 local authorities, from other planning authorities and from a range of businesses, public bodies, third sector organisations and professional bodies.
4. There was considerable diversity in terms of the structure, focus and length of responses. There was also considerable variation in the number of questions or issues respondents chose to address.

## A Low Carbon Place

5. This theme covered the topics of: renewable heat; onshore wind; offshore renewable energy; base-load electricity generation requirements; electricity transmission, distribution and storage; and retaining the benefits from the energy sector in Scotland.
6. Most of those who commented on the coverage of renewable heat in the Main Issues Report felt that NPF3 could go further in supporting the decarbonising of

the heat sector. In particular, comments focused on the potential to increase District Heating Networks and the use of waste heat.

7. Comments on the Scottish Government's stance on onshore wind were many and varied. Many respondents disagreed with the Government's stated support for onshore wind energy developments. Some commented on the negative impact they felt existing wind farms have had on Scotland's landscape and communities. However, others took a very different view and suggested that Scotland's potential to generate energy from onshore wind developments should be exploited further.
8. The Main Issues Report notes the possibility of using the wild land mapping produced by Scottish Natural Heritage (SNH) as a key tool to inform future planning for wind farm development and to identify more clearly those areas to be protected. As with the wider issue of the further development of onshore wind generation, use of the SNH wild land mapping divided respondents.
9. Support for offshore renewable energy was welcomed, and a range of suggestions were made as to how NPF3 could go further by supporting aspirations for further development. However, as with the onshore wind industry, some respondents were concerned about the impact that infrastructure developments would have on the environment.
10. A number of the comments were made on the intention to fit Scotland's thermal generation capacity with carbon capture storage (CCS) technology. Some respondents were concerned about the reliance apparently being placed on a technology they felt to be unproven. However, others saw considerable potential in CCS.
11. Many respondents - including 147 individuals who submitted campaign responses - objected to the proposal for a carbon capture and storage plant at Grangemouth. Their principal concern was that there is already too much industry and heavy traffic within the town, resulting in poor air quality. Others took a more positive view and noted the

contribution it could make to the country's base-load generation.

12. Several respondents emphasised the importance of increasing energy storage capacity, especially with regard to pumped storage hydro-electricity.

### **A Natural Place to Invest**

13. The focus of this theme was on Scotland's natural and cultural assets, and their importance in providing essential services, supporting quality of life and sustaining economic growth. Amongst those that commented, many welcomed the role that NPF3 could play in supporting the sustainable use of assets. However, some others challenged an approach which they considered to be prioritising development over conservation and protection.
14. There was a generally warm welcome for the focus on peatland conservation and restoration and the recognition given to the role that woodland can play in meeting climate change targets. Many respondents supported the development of a National Ecological Network, including some who felt it should be a national development.
15. Views about what NPF3 should do to facilitate the delivery of national development priorities in sensitive locations were mixed. Some respondents were positive about the attention being placed on strategic environmental enhancement and mitigation. Others would have preferred more emphasis on limiting or inhibiting damage being done to sensitive areas in the first place.
16. Many of the comments made on sustainable resource management focused on waste management. A broad although disparate range of further comments were made.
17. A number of respondents commented on the importance of recognising and protecting Scotland's natural and cultural assets, whilst recognising the value these assets have in supporting tourism. Most respondents who commented on the proposal for a national network of long

distance walking and cycling routes were strongly supportive of including it as a national development. There were many proposals for routes to be included in the network. It was also noted that care must be taken to avoid wildlife disturbance.

### **A Successful, Sustainable Place**

18. The third theme focused on the role of NPF3 in promoting high quality development, the creation of places that are distinctive, healthy and sustainable, and sustainable economic growth. National developments proposed under this theme, included Dundee Waterfront, Ravenscraig and the Central Scotland Green Network.
19. A number of respondents supported the focus that the Main Issues Report gives to the role of key growth sectors in supporting sustainable economic growth. The vital role that infrastructure will play in either promoting, or potentially hindering, economic growth was raised. Some respondents suggested that NPF3 should recognise that insufficient investment in key infrastructure, will pose a risk to sustainable economic growth.
20. The emphasis being placed on the role of town and city centres in supporting sustainable economic growth was also broadly welcomed. There was a range of views on the role that NPF3 should play in supporting their reinvigoration.
21. Dundee Waterfront and Ravenscraig retaining or receiving national development designation was broadly supported, with some highlighting the economic, social and environmental benefits of these developments.
22. There was broad support for the continued designation of the Central Scotland Green Network (CSGN) as a national development.
23. Those who commented on NPF3's role in meeting the need for housing often suggested that NPF3 had an important role in raising awareness about the need to address shortfalls in housing provision. There were calls for NPF3 to address specific barriers or issues - principally in

relation to infrastructure and supply of land - which may be constraining housing development. Views about whether housing targets are best set at a local authority or a regional level were mixed.

## A Connected Place

24. The fourth theme addressed in the Main Issues Report focused on the Government's transport-related aims, and how these can contribute to the NPF3's spatial strategy. Several national developments were proposed including airport enhancements, Aberdeen Harbour, Grangemouth, Freight on the Forth and High Speed Rail.
25. The majority of those commenting expressed broad agreement with the overall focus of the Main Issues Report. In particular, most agreed that Scotland needs to focus on decarbonisation of transport, although some expressed concerns about the investment likely to be required to make significant advances.
26. Some respondents felt that the overall transport strategy and investment programme is not fully aligned with the climate change agenda. It was suggested, for example, that large scale road developments are not consistent with decarbonisation of transport. Other issues raised included the role of city and town centres as transport hubs and sustainable settlements, the contribution of electric vehicles and alternative fuels, and reducing the need for travel.
27. A number of respondents supported the focus on improving digital connectivity, particularly in relation to rural and remote areas. Some respondents were of the view that NPF3 needs to set out clear targets for delivery of digital connectivity. It was suggested that more detail, including timescales, is required on the expected improvements to infrastructure. The promotion of active travel was also raised, with cycling and walking being seen by some as key to decarbonisation of transport. Respondents raising this issue frequently highlighted the role of active travel in reducing the volume of road traffic and encouraging a substantial shift to public transport.
28. Respondents put forward a broad range of suggestions for specific improvements to the road and rail infrastructure. In terms of international connections, there was support for the designation of Aberdeen Harbour as a national development and those who commented on the Grangemouth Investment Zone were also broadly in favour of its designation. However, support for new freight capacity on the Forth becoming a national development was less clear.
29. Most of those who commented about airports were supportive of the plans for airport enhancements to have national development designation. Others disagreed, with these respondents often suggesting that designation ran contrary to NPF3's focus on a low carbon economy, and specifically the aim of decarbonising transport.
30. Amongst those who commented, there was also majority support for national development designation being given to the High-Speed Rail (HSR) link to London. Opposition to designation of the HSR link was primarily linked to a view that HSR should be a longer-term priority, given the considerable period until development is expected to be complete. Whilst some supported the Edinburgh-Glasgow HSR link as part of this national development, others were opposed, raising concerns that it should not be prioritised over investment in transport infrastructure in other parts of Scotland.

This document, along with full research report of the project, and further information about social and policy research commissioned and published on behalf of the Scottish Government, can be viewed on the Internet at: <http://www.scotland.gov.uk/socialresearch>. If you have any further queries about social research, or would like further copies of this research findings summary document or the full research report, please contact us at [socialresearch@scotland.gsi.gov.uk](mailto:socialresearch@scotland.gsi.gov.uk) or on 0131-244 7560.