

## **Heads of Planning Scotland (HoPS) Response to NPF3 Main Issues Report**

### **Introduction**

HoPS wishes to provide comments on the NPF3 Main Issues Report (MIR)/draft Framework beyond the questions posed on the respondent form. Many of the questions relate to specific proposed national developments, which HoPS will leave individual authorities and interested stakeholders to comment on. The comments start with general observations on the MIR, followed by comments using the section headings of the document.

### **General Comments**

HoPS welcomes publication of the NPF3 MIR, and in general terms it is felt that the document offers a relatively clear vision for sustainable economic growth and transition to a low carbon economy. It is also welcomed that NPF3 and SPP are being consulted on simultaneously, as this reinforces the relationship between the two documents.

It is, however, disappointing to note that the 'reasonable alternatives' to the preferred options in the proposed framework are set out separately within the accompanying Environmental Report. The process would be more transparent if the alternatives were contained in the main consultation report.

Furthermore, HoPS considers that the focus of the national developments appears to be on already committed projects. One of the Scottish Government's key headings for NPF3 is 'ambition'. HoPS therefore considers that the NPF3 could go further in setting out ambitious new national projects, which could contribute towards sustainable economic growth, as opposed to not just focusing on projects which are committed or underway. Where is the next Dundee Waterfront or Ravenscraig, for example? NPF3 offers a major opportunity for a long term plan led strategy for Scotland's future national developments. This point is reinforced by the fact that, like NPF2, NPF3 appears to be led by the Scottish Transport Projects Review and the Scottish Government's Infrastructure Investment Plan, as opposed to NPF shaping the priorities of these documents. This relationship does not sit well with the statements in paragraphs 4.39 and 5.16 that suggest that the NPF should be influencing infrastructure decisions.

On a related note, HoPS feel that the mapping and text should more clearly reflect a difference between committed and new national developments. A step further could be to identify short, medium and long term national developments to give some indication of priority and timescales.

HoPS considers population and demographic change has been inadequately addressed within the MIR. Population shift, together with the ageing of the population, are issues with major land use planning impacts of national importance. The Scottish Government's position on population change in Scotland, and how this should be managed, need to be articulated within NPF3. Both within areas of population growth and areas experiencing de-population, NPF3 should set out a framework of how sustainable economic growth can assist in managing population across Scotland.

It is noted that, in terms of the national developments, there seems to be a distinct focus on the east coast and central belt. A broader balance of national priority should be considered. Further consideration of the need for NPF3 to provide more specific direction for areas outwith Strategic Development Planning regions and within rural and island areas. Furthermore, HoPS considers that there should be a clearer and stronger link to the Government's cities agenda. This could be achieved with a greater focus on the 7 Scottish cities and their regions within NPF3, for example by articulating the key growth sectors for each city region, their transport connectivity priorities and providing a graphical representation of the key national assets and opportunities within the 7 city regions. This would assist in linking with Development Plans.

### **Presentation**

The MIR seems weighted towards text, though the effort to express concepts graphically in the MIR, when compared to NPF2, is welcomed. The Scottish Government should consider how the text of the finalised NPF3 could be reduced further than that contained within the MIR.

All maps in the document should contain a title and a key. The spatial strategy in particular would be more easily interpreted if it had a key. The resolution of many of the maps is not of sufficient quality, for examples maps 5, 7-10. The legibility of some maps is unclear, due to too much information contained on the map at the scale provided, for example maps 5 and 21.

The new style grey maps with colour coded information are welcomed and reflect the sharp, modern focus that the MIR and subsequent finalised NPF3 should have. To help interpret these graphics it would be helpful to include other graphics which show the layering of information and help the reader understand what the graphics are saying.

### **Spatial Strategy**

NPF3 should also articulate the relationship between the spatial strategy and the list of national developments- clarity on the status of developments identified on the spatial strategy, but not as national developments, is required.

A number of the bullets set out in pages 4-6 state 'supports' and 'promotes'. Clarity is needed on how NPF3 and the Scottish Government support, promote etc.

Para 1.14, 5th bullet, states 'supports economic growth at key locations' – what are the key locations referred to?

Para 1.14, last bullet – what does a 'flexible approach' mean?

### **A Low Carbon Place**

HoPS welcomes a wider consideration of Energy within the MIR, however considers that more emphasis should be placed on improving efficiency and overall reduction in energy use.

HoPS therefore considers that the structure of this section should be adjusted. The ordering of the sub headings within the section could be more coherent- baseload electricity generation should feature earlier, as it sets a context. Transmission, storage and distribution of electricity should sit side by side with offshore renewable energy due to their interrelationship.

There is a further intrinsic relationship between the identified NRIP sites (page 7), and the sites for offshore wind turbines identified in Map 3 (page 16), as the NRIP sites are key to the delivery of the offshore locations. This relationship should be more clearly articulated.

The targets specified within paragraph 2.4 require some contextualisation- i.e. a point of reference to explain what has been achieved to date, and what the gap is to achieve the target specified. There is also an opportunity to link the relevant national developments directly to how they will achieve the targets, where applicable.

HoPS members have differing views on the merits of designating national 'no-go' areas for wind turbines. It is generally felt that this was more of a policy (SPP) issue, and that the policy framework within LDPs would not allow onshore wind farms in National Parks, NSAs or core wild land areas (though there is still some ambiguity on buffer zones for these areas). HoPS strongly considers that NPF3 should set out an understanding of future turbine requirements for Scotland and potentially other renewable energy sources. This would help assess whether the increased pressure placed on residual areas, after scoping out unacceptable locations for such development, is reasonable and whether delivery remains achievable. This national work would help evidence how targets are being achieved and provide a clearer understanding for Development Plans, within which detailed wind energy spatial strategies are undertaken.

Electricity distribution and storage should be considered within NPF3 in more detail to provide a national framework. The potential role of energy storage could be significant and this requires to be considered in finalising the NPF3.

NPF3 seems to be silent on the future of coal mining in Scotland. Given the recent administration of Scottish Coal, a national position on coal for Scotland would be helpful. NPF3 also only makes a passing reference (paragraph 2.54) on the emerging issue of hydraulic fracturing of for oil and gas, and any future for this activity in Scotland.

HoPS questions whether reference to community ownership of turbines (p17) is required within a national land use planning document.

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

HoPS considers that NPF3 should provide a clearer and stronger framework for how landuse could change as a result of climate change and provide a context for adaptation through the planning framework to inform Development Plans.

This section should make more reference to the role Scotland's coastal assets and inland waters (lochs, rivers, canals etc.) play in attracting visitors for marine based recreation, and the fact that this is a growth sector for the country, for example sailing on West coast. There may be scope to map key national assets to illustrate this point further.

In terms of waste facilities, HoPS considers that identification of strategic waste facilities is not usually site led- it is led by commercial viability and licensing factors. That being said, if the Scottish Government is of the view that there is a need for waste facilities of a national scale, then they should be designated within NPF3. What as a nation do we need?

The MIR sets out long distance walking and cycling routes. HoPS considers the role of NPF3 should be to identify how this could be enhanced at a national scale and set out what new projects are required and how these can be delivered.

HoPS raises some concern in relation to references to a national Tourism Development Plan which is yet to be finalised. There appears to be an expectation that Development Plans will support this tourism plan. HoPS consider that any tourism landuse projects/developments of a national scale should be set out in NPF3 and then it is the role of Development Plans to consider tourism development projects and developments.

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

HoPS welcomes the recognition of two major regeneration projects as national developments- Dundee Waterfront and Ravenscraig. Individual member Authorities may comment on whether there are other regeneration projects of a national scale they consider should be included. As commented above however, HoPS considers that NPF3 should identify future ambitious regeneration national long term projects- those to follow on from current committed projects. Sustainable economic growth will not be delivered by these sites alone - which provides further justification for NPF3 to consider the city regions as an appropriate scale to examine sector growth opportunities. This approach would also help to address the contribution rural and island areas can make to sustainable economic growth, and that there is a need for NPF3 to identify more opportunities for these areas.

HoPS considers that NPF3 should set a realistic national housing target, perhaps informed by a national housing need and demand assessment using data from the 2011 Census . The emphasis is on 'realistic', which would then set a framework for Development Plans. Such a target would need to be clearly informed by the economy and related projections. This will not resolve the more fundamental issue of delivery of housing. On that point, HoPS considers that NPF3 should provide more ideas or direction to try and stimulate development activity and deliver new housing. The level of construction activity in Scotland is a national issue.

More concentration on why national developments (inc. demonstration projects through SSCI) are not being delivered would help set out more detail on delivery within NPF3. How national projects are delivered is not set out in enough detail (albeit, recognising the Action programme will be updated and aligned with NPF3 as it is finalised).

### **A Connected Place**

NPF3 MIR does not appear to set out any analysis of current and projected freight movements to justify the national developments selected on pages 60 and 61, nor does it differentiate between road and rail freight.

HOPS suggests that digital infrastructure is more of a policy issue for the planning system, and may be better dealt with within SPP.

### **Other Comment**

HoPS encourages the Scottish Government to consider a regular review of NPF and suggests that more research should be undertaken to inform the next review and provide a stronger evidence base. HoPS recognises that the NPF3 MIR was prepared in a short timescale and suggests that a longer preparation timescale should be set out for a further review, allowing time for new research.