

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Friends of the Earth Scotland

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Dixon

Forename

Richard

2. Postal Address

Thorn House

5 Rose Street

Edinburgh

Postcode EH2 2PR

Phone 0131 243 2700

Email rdixon@foe-

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

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?

GENERAL – we welcome the emphasis on delivering a low carbon Scotland and on meeting our climate targets but the NPF3 fails to deliver on these commitments in a number of areas, particularly transport. We would also welcome a space on this form for general/introductory comments.

Switching to renewables heat, and using heat more effectively in general are key issues in creating a low carbon Scotland. Scotland is currently ahead of the curve on meeting the 11% renewable heat target for 2020. This target should be reviewed with a view to increasing it.

We support the government's current policy to make maximum use of heat and to prioritise locally-sourced, small-scale biomass. However the current proposals by Forth Energy are contrary to this policy, being medium-scale, fuelled by wood from overseas and with no guarantees that any waste will be put to any useful purpose.

Recent experience in Scotland suggests that the CHP option is often discarded in favour of fossil fuel heating on cost grounds and that heat generators are unwilling to take on the risk of gearing up to supply heat when their customers might cease to be interested in future. The planning system needs to do more to rebalance these decisions so that maximising the use of heat becomes the easy option or indeed the only option.

We also support the aim to encourage more community and local ownership of renewables sources of both heat and electricity. The 500MW target for community- and locally-owned renewables by 2020 is welcome but Scotland progressing very well and this target should be reviewed with a view to increasing it.

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?

Wild land is a legitimate consideration in the consenting of wind farm developments but the definition and extent of wild land are still contentious and the SNH map referred to has not been subject to consultation in its revised form. This work needs to be more robust before it is incorporated into spatial planning frameworks.

We agree that the NPF3 should identify and safeguard areas where there remains the greatest

potential for further large scale wind energy development.

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?

We agree that the NPF3 should identify key infrastructure development needed to support large-scale deployment of offshore renewables as national developments.

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 Cockerzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

Scotland needs to rapidly decarbonise our energy supply. This means reducing demand, increasing efficiency, switching to renewables and, as the last strategy, decarbonising fossil fuel use. Given the several false starts so far in getting CCS operating in Scotland, Peterhead and Grangemouth should only be included as national developments if sufficiently robust timescales and CCS efficiencies are included and enforced. For instance for the Grangemouth proposal the plant should be fully covered by CCS from day one of operation and should only be allowed to run if it achieves at least 90% carbon capture.

Cockerzie should not be classified as a national development unless a similar guarantee is given that it will be built with CCS.

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?

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

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

This section should more closely link the transfer of oil jobs into renewables as the latter industry expands and the former begins to decline.

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?

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?

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?

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?

We welcome the recognition of the need to go beyond talking about waste and to deliver resource efficiency and facilitate action further up the waste hierarchy.

While anaerobic digesters are a sensible part of any waste strategy, the development of other kinds of energy-from-waste plants are an admission of failure to take action further up the waste hierarchy. Advanced thermal treatment has a very poor record in Scotland, as exemplified by the failure of the (now somewhat charred) Scotgen gasification plant in Dumfries to complete commissioning after 4 years.

Planning authorities need more guidance on what kind of thermal treatment might be needed, so that they can avoid giving permission to excessive or inappropriate capacity which then locks resource use in a particular area into low recycling, high recovery operations. This is particularly important given that any consented plant will operate for many decades, during which time Scotland's targets show that we should be recycling and composting much more, and reducing waste volumes significantly, in theory leaving rather little to burn.

As with opencast mining sites, it has been suggested that a significant gap exists between the resources available from bonds currently lodged and the clean up and restoration costs of current landfill sites. The planning system has failed to deliver for communities in this regard and the NPF3 must ensure it will do better in future in relation to restoration guarantees for any waste treatment and disposal facilities.

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?

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?

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?

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?

We do not believe that the Government's overall transport strategy is consistent with the NPF3's stated aim to 'largely decarbonise our transport networks' because of the dominance of large road schemes in the Infrastructure Investment Plan.

It is quite remarkable that the NPF3 does not make any significant reference to air quality, given the need to meet EU, UK and Scottish air quality objectives and standards, currently widely breached in Scotland's large urban areas. The Strategic Environment Assessment stresses the key role planning needs to play. Air Quality Management Areas are a significant constraint on road-based development and the planning system is the main tool by which local authorities can address the air pollution problems which cause their designation, yet they are not mentioned. Air pollution problem areas should be seen as a significant strategic factor in determining the development framework for Scotland's urban areas.

The NPF3 should make it clear that cycling and walking networks for everyday use should be prioritised as part of new and existing development.

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?

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 a part of the longer-term spatial strategy?

The set of national developments listed in this chapter cannot be reconciled with Scotland's climate change targets. While we welcome the commitments on walking and cycling, and the removal of national development status from the Hunterston power station, the dominance of fossil-fuelled transport projects is very disappointing. In particular we strongly oppose the including of capacity-enhancing airport developments as national developments.

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?

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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.

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.

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