

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

Stop Climate Chaos Scotland

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

Surname

Wilson

Forename

Gail

2. Postal Address

2nd Floor, Thorn House

5 Rose Street

Edinburgh

Postcode EH2 2PR

Phone 0131 243 2701

Email

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?

As no space has been provided in this form for general comments, they appear below:

Overall, it is encouraging to see continued commitment from the Scottish Government in the draft NPF3 MIR to delivering on the Climate Change (Scotland) Act 2009, reducing Scotland's emissions and focusing on a low carbon economy. However, substantial aspects of the framework are inconsistent with this vision.

Stop Climate Chaos Scotland is concerned by significant contradictions in the draft NPF3 between the Scottish Government's low carbon ambitions and an ongoing focus on carbon intensive activities such as over-reliance on North Sea oil and gas, large road-building programmes and fossil-fuelled power stations.

The scale of ambition outlined in the Scottish Climate Change Act is correct. In 2009, MSPs unanimously agreed to greenhouse gas emissions reductions based upon global scientific consensus on the minimum levels required to tackle the global problem of climate change. Nonetheless, the targets to reduce Scotland's emissions are challenging and will require considerable leadership and action from the Scottish Government to be realised.

The NPF is one of the key opportunities for this leadership to be clearly set out. At present the framework does not achieve this, as it presents a confused picture of intentions for Scotland's future. In short, Scotland cannot be low carbon and have an economy based heavily upon fossil fuel extraction and high carbon travel.

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?

No response

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?

No response

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?

Scotland needs to rapidly decarbonise our energy supply. This means not only increasing the amount of energy produced from renewable sources but also reducing reliance on fossil fuels. The NPF3 should set out how and when the latter will be achieved alongside the former. Reducing reliance on fossil fuels and increasing renewable energy production must go alongside efforts to reduce overall energy demand in Scotland.

In addition to Scotland decarbonising its energy supply, the ambition must also be for energy which is exported to be from low carbon sources. Exporting energy produced from unabated fossil fuels would still cause the resulting greenhouse gases to end up in the atmosphere, even if not on Scotland's emissions balance sheet. This would be incompatible with Scotland's stance on climate justice.

If thermal power generation at Grangemouth is to be designated as a national development, CCS must be fitted to the full generating capacity, achieving at least 90% carbon capture from the start. In general, reliance upon CCS within the framework, as well as in the recently published RPP2, is a concern as this remains an unproven technology at commercial scale. Unsuccessful demonstration or rolling out of CCS is a key area of uncertainty in whether Scotland will meet our climate change targets. We are very concerned that no reference is made to a minimum level of CCS abatement required in order to qualify for national development status. It would be insufficient that new plants simply be 'carbon capture ready'.

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 response

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?

NPF 3 Main Issues Report: Consultation Questionnaire

We welcome the statement that NPF3 should focus heavily on the transition to the low carbon economy but are disappointed that this does not translate into leadership on how Scotland might start to reduce dependence on fossil fuels. This section seems to be contradictory in this regard and we would encourage further consideration of how to manage moving away from over-reliance on the oil and gas sectors alongside the growth of renewables.

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?

No response

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?

No response

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?

No response

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?

NPF3 should emphasise that local authorities should plan for an overall reduced output from fossil fuel extraction over the coming decades.

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?

We have serious doubts about the usefulness of the term 'sustainable economic growth' due to the lack of any clearly developed definition and the potential for it be interpreted as placing economic growth above social and environmental factors. 'Sustainable development' should be used instead as it has a clear definition and we welcome its use in question 11.

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?

No response

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?

No response

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'. This statement is not compatible with the Infrastructure Investment Plan or the Strategic Transport Projects Review, which primarily identify road infrastructure for significant investment. Section 5.13 describes how it is important that NPF3 contributes to reducing the need to travel. We believe it is disingenuous to suggest that the NPF to reduce travel alongside significant investment in new road infrastructure.

There is an urgent need to improve coordination between planning and transport at national and local levels. The NPF should take more of a lead role in this, and must do if the need for travel and transport emissions are to be reduced. This is a major weakness in the spatial planning for Scotland's development as a whole. At present, it is apparent from the MIR that this is dictated by transport infrastructure decisions which have already been made rather than sound strategic planning for sustainable development, which should be led by the National Planning Framework.

NPF3 should make it clear that cycling and walking networks for everyday use should be prioritised as part of new and existing development. However, SPP is likely to be a better vehicle for setting out requirements to planning authorities.

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 response

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 national developments proposed in this chapter highlight some of the biggest contradictions in Government policy and in the NPF3. Positive words about greenhouse gas emissions reduction sit awkwardly with proposals for transport infrastructure which would increase emissions.

Increasing emissions from aviation through enlarging airport capacity runs counter to the ambitious targets to reduce Scotland's emissions. However, if, contrary to this, airport enhancements are designated as national developments, there must be a credible commitment to the 'shift in emphasis towards low carbon options and digital links' mentioned.

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?

No response

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 response

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 response