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6<sup>th</sup> June 2014

*Dear Derek,*



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### **National Planning Framework 3 (NPF3) and Scottish Planning Policy (SPP)**

Scottish Environment LINK welcome the discussions we have had with you and your officials over the course of the last 2 years regarding the development of NPF3 and the review of SPP. We welcome your confirmation that both documents will be published on the 23<sup>rd</sup> of June and we commend you on keeping the public informed of progress throughout.

LINK recognise that the production of these two policy documents represents one of the most significant opportunities for Scottish Ministers to set out their vision for the sort of place they want Scotland to become.

In LINK, we wish to see the best possible Scotland too and, accordingly, we hope to see the following measures set out in the final SPP and NPF:

- Both the NPF and SPP must make it clear that all development must be sustainable. In particular, it must be clear that social and environmental factors will be given at least equal weight to any economic impacts. We welcome moves to clarify this in the supplementary consultation carried out on sustainability and planning but we remain very concerned about the use of the term "sustainable economic growth", which risks unbalancing the planning process in favour of economic factors. This needs to be addressed in the final SPP.
- The NPF and SPP should provide a clear steer for onshore wind development by incorporating SNH's strategic locational guidance in full, not just in relation to Wild Land. This would help reduce conflict, stopping unsuitable development but also encouraging more suitable development. A similar approach should be considered for other development types.
- The NPF and SPP should make it clear that the precautionary principle will be applied rigorously to unconventional gas extraction, leaving reserves in the ground until climate and other environmental and health concerns are fully addressed – and that a policy of 2.5km protective buffer zones around settlements close to any UG

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- development will be put in place.
- Planning authorities must be encouraged to ensure they have access to expert historic environment advice.
  - The need to protect and enhance our supply of green infrastructure must be recognised. In addition to ensuring protection of existing protected areas, the NPF and SPP should set out how Ministers will extend the protected area network, in particular through new national parks and a national ecological network for Scotland, and provide guidance on how planning authorities should consider the unique circumstances of these areas in the development planning and management processes.
  - The NPF and SPP need to provide clear, robust guidance on how climate change should be considered in the planning process. It should be made clear that the climate change implications of new development is a significant material consideration and could result in a planning application or a development plan being unacceptable. This needs to include protection, from all development types, for our most carbon sensitive landscapes, such as peatland and native and semi natural woodland.
  - We also believe that the 23<sup>rd</sup> of June would be an ideal moment to confirm that permitted development rights for agricultural and forestry tracks will be removed, simplifying the regulatory framework for landowners, planning authorities and the public and providing some comfort to our many members getting increasingly concerned by ongoing unregulated damage to the countryside.

The publication of the NPF and SPP is an opportunity for us to set out how Scotland can become an international exemplar in planning for sustainable development, using the planning and other regulatory systems to ensure not only that that the right development happens in the right place but that damaging development is also quickly stopped or discouraged from being proposed in the first place. I hope that you are able to grasp this opportunity and that Scottish Environment LINK and our members are able to commend your work on the 23<sup>rd</sup> of June.

yours sincerely,

A handwritten signature in black ink, appearing to read 'Aedán Smith', with a long horizontal flourish extending to the right.

Aedán Smith  
Convener, LINK Planning Task Force