

## National Planning Framework 3 and the Scottish Planning Policy

### Summary

- LINK broadly supports both consultation documents on SPP and NPF3
- The SPP should require planning authorities to give significant weight to SNH's Strategic Locational Guidance for Onshore Wind when making planning decisions
- The new SPP should make it clear that unconventional gas extraction projects should not be consented unless environmental, health and climate concerns can be fully addressed.
- The NPF should make it clear that national development status does not establish the need for development at specific locations where this is not clearly defined in the NPF
- NPF3 should include a commitment to progress proposals for new national parks.
- National development status should be given to a National Ecological Network for Scotland

### Background

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. This briefing sets out our initial views on the third National Planning Framework for Scotland (NPF3) Main Issues Report (MIR) and the consultation draft of Scottish Planning Policy (SPP). LINK broadly supports both consultation documents. However, there are a number of areas where further improvements are required.

### Sustainable economic growth

It is welcome that both the draft SPP and NPF3 MIR state government's central purpose in full: "*to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth.*" This is often misleadingly shortened to simply: "increasing sustainable economic growth". However, both the draft SPP and NPF3 MIR still give undue prominence to the perceived need to increase sustainable economic growth. LINK recognise the need for economic development as a key component of genuinely sustainable development, but the manner in which this is expressed in the draft SPP and NPF3 MIR heavily implies that economic growth should be given greater emphasis than the environmental and social elements that are essential to sustainable development and to improving quality of life.

LINK welcome the continued reference to sustainable development in the SPP but are concerned that commitment to it is weakened by excessive focus on sustainable economic growth. The SPP, for the first time, also states (paragraph 17) that significant weight should be attached to the economic benefit of proposed developments. This is a of significant concern to LINK and we think it is unnecessary and confusing. Developers are better placed to decide which projects are of economic benefit and are hardly likely to progress them if they think they will not be. It is also not clear what parameters will be used to consider economic benefit. For example, short term economic benefit could be very damaging to a local economy in the long term if it results in destruction of an important environmental asset, or if development requires significant restoration and remediation. As a minimum, **it should be made clear that potential economic benefits will not take precedence over protection of the environment or of local communities.** The major financial shortfalls for the restoration of open cast coal sites that have become apparent following the financial collapse of the two largest open cast coal operators is a an unfortunate current example of what can happen when short term economic benefit is allowed to override environmental and community protection concerns.

### Onshore wind

We welcome the new approach to onshore win set out in the SPP. For the first time, this makes it clear that windfarms will not be acceptable in National Parks or National Scenic Areas and it

identifies further areas of significant protection including areas of wild land identified by SNH. However, SNH have done further mapping work to identify other natural heritage sensitivities, including areas of peatland and areas important for birds, in the form of their Strategic Locational Guidance for Onshore Wind. Given that this is produced by Government's statutory nature conservation advisors, it is surprising and disappointing that it has not been referenced in the SPP. It could provide a very useful national steer to indicate where onshore wind development is more likely to be acceptable, making it more likely that conflicts are avoided. **The SPP should state that significant weight should be given to SNH's Strategic Locational Guidance for Onshore Wind when planning authorities are preparing their development plans and in development management decisions.**

### **Unconventional gas and fossil fuels**

Unconventional gas extraction, which can include a process known as fracking, can result in a wide range of environmental and health concerns. There is potential for direct damaging impacts from drilling and processing operations and for significant greenhouse gas emissions. There are current proposals for unconventional gas extraction in Scotland. In particular there is a current planning application with Scottish Ministers for coal bed methane extraction in Falkirk and Stirling council areas. The draft SPP proposes a less supportive tone for unconventional gas than the current SPP. LINK welcomes this but we need to go further and **the new SPP should make it clear that unconventional gas extraction projects should not be consented unless environmental, health and climate concerns can be fully addressed.**

### **National developments**

LINK remains concerned about the process for consultation on National Developments, particularly where they are not location specific, such as for grid infrastructure or high speed rail. **If national development status means that the need for development can not be considered at the application stage, it needs to be made clear that this does not extend to the need for development at specific locations where this is not defined in the NPF.**

The specific removal of the proposed coal fired power station at Hunterston from national development status is very welcome, as is the continued retention of the Central Scotland Green Network (CSGN) as a National Development.

It is disappointing that proposals for new national parks have not been taken up. **NPF3 should include a commitment to progress proposals for new national parks.**

It is disappointing that proposals for a National Ecological Network for Scotland have not been accepted, even though it is recognised as an excellent long term aspiration in the NPF MIR. LINK believes that a National Ecological Network would complement the CSGN and help provide the green infrastructure for Scotland that is as essential as our built infrastructure if we are to make Scotland a world class place in which to live work and invest. The European Commission recognises green networks and infrastructure as "a key step in implementing the EU 2020 Biodiversity Strategy". **National development status should be given to a National Ecological Network to confirm commitment to green infrastructure.**

This LINK Parliamentary Briefing has been prepared on behalf of the Scottish Environment LINK Planning Task Force

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