

# **The Association for the Protection of Rural Scotland**

## Proposed National Planning Framework 3

### Evidence to Scottish Parliament

### Rural Affairs, Climate Change and Environment Committee

#### Sustainable Development

The NPF3 should support 'sustainable development', which is founded on accepted internationally-agreed principles, including living within environmental limits and ensuring a strong, healthy and just society, rather than the Scottish Government's current focus on 'sustainable economic growth', which lacks any such rigorous foundation.

#### Rural Housing

The statement "We do not wish to see development in our rural areas unnecessarily constrained" at para 2.24 raises concerns, as this may be used to support proposals for uncontrolled sprawl of housing and other development in rural areas, generating both landscape impacts and increased carbon emissions through unnecessary travel. Although there will continue to be some opportunities for small-scale house-building in rural areas, most significant development should continue to follow long-established planning practice by being concentrated in existing settlements with easy access to services, particularly those with rail stations. As rightly stated at 2.24, "careful planning is required to manage demand in our most accessible countryside around towns and cities".

#### Spatial Guidance for Onshore Wind

We welcome the Scottish Government's proposal to increase protection for National Parks and National Scenic Areas (NSAs) from wind energy developments. However, all impacts upon such valued areas need to be managed, not just those from developments located within such areas. Such protection should therefore also apply where a major development is proposed outwith National Park or NSA boundaries which would impact upon the special qualities they were established to safeguard. While the current greatest threat to these protected landscapes comes from large onshore wind developments, the same considerations should apply equally to any large development proposals, including transmission lines. The Scottish Government, Scottish Natural Heritage (SNH) and other organisations must use all relevant policies to safeguard the experiential qualities that make Scotland's landscapes so valuable to residents and visitors.

However, not all of our finest and most iconic landscapes are covered by National Parks or NSAs. NPF3 should therefore also increase the level of protection from wind energy and other large-scale developments afforded to other protected landscapes, including Special Landscape Areas, historic gardens, designed landscapes, battlefields and the settings of historic towns.

We supported the proposed increased recognition of the importance of wild land in the Draft NPF3, but are concerned that this has been dropped from the Proposed NPF3. Core Areas of Wild Land, as defined by SNH, should be given the same level of protection as National Parks and NSAs, including protection from visually intrusive developments beyond their boundaries. The Core Areas of Wild Land mapped by SNH should be

included in NPF3 as part of the Environment map, to show all areas protected from wind energy developments on a single map.

The current expansion of renewable energy is generating landscape and other impacts of national importance. There is therefore a legitimate requirement for clearer spatial guidance at the national level, so it is right that NPF3 should indicate where there are significant national landscape constraints to large-scale onshore wind energy development. NPF3 may be the best place to identify the limited number of remaining areas suitable for large-scale onshore wind energy development.

### Offshore Renewables

The development of offshore renewable energy clearly has implications of national significance and it is therefore appropriate to include this in the Proposed NPF3. However, the sections on offshore renewable energy should also indicate where there are significant landscape constraints to large-scale development, in the same spirit as the onshore wind section. These are likely to be particularly severe for the west coast proposals, where some of the proposed developments are so close to land that their landscape impacts are as great as if they were onshore developments.

### Land Use

We welcome the clear statements setting out the important contribution of Scotland's landscapes to our quality of life, national identity and visitor economy (4.4), supporting the Land Use Strategy (4.8) and its two pilot projects (4.17) and stressing the continuing importance of protecting prime agricultural land (4.16). The Proposed NPF3 rightly highlights the importance of peatlands for wildlife and carbon storage (4.2), and its commitment to peatland restoration is welcome.

It is disappointing that proposals for a National Ecological Network have not been accepted, although it is noted (4.17) that Scotland's 2020 Challenge for Biodiversity aims to develop a national ecological network over time. A National Ecological Network would complement the Central Scotland Green Network and help to provide the green infrastructure for Scotland which is as essential as our built infrastructure if we are to make Scotland a world-class place in which to live, work and invest. National development status should therefore be given to a National Ecological Network, in order to confirm the Scottish Government's commitment to green infrastructure.

### National Parks

As the Proposed NPF3 states (4.23), Scotland's two National Parks are exemplars of sustainable development based on environmental assets and natural resources. It is therefore disappointing that the proposals from APRS and the Scottish Campaign for National Parks for the designation of more National Parks have not yet been accepted as a National Development, although we note that the report on proposed national developments did assess this as an 'opportunity'. We remain of the view that the NPF3 should include a commitment to progress proposals for new National Parks, for the reasons set out in our 2013 report *Unfinished Business*.

## National Cycling and Walking Network

We support the inclusion of the proposed National Cycling and Walking Network as a National Development. The crucial ingredient for the successful implementation of this proposal will be to invest as seriously in the maintenance of existing routes as in the construction of new ones.

## Central Scotland Green Network

We support the continued designation of the CSGN as a national development; the Proposed NPF3 rightly highlights the important links it demonstrates between planning, health and wellbeing. Living in a beautiful, accessible and unpolluted landscape and environment has a positive influence on people's health as well as having a job and a decent home do.

## Housing

The strategy set out in the Proposed NPF3 follows what could be characterised as a 'predict and provide' approach, by extrapolating predicted population growth and household formation rates to generate the number of new houses which must be built. This is worrying given the likely adverse landscape and climate change impacts of such large numbers of additional houses, particularly as much of the pressure for house-building is likely to come in our valued Green Belts and other countryside around towns. NPF3 should do more to encourage higher-density housing, redevelopment of derelict land and bringing vacant properties back into use. There may even be scope for more innovative thinking in terms of seeking to influence household formation rates, in order to reduce pressure for additional housing, rather than simply accepting these as inevitable.

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### APRS - Scotland's Countryside Champion

APRS is the charity which promotes the care of all of Scotland's rural landscapes. We aim to:

- protect and enhance Scotland's rural landscapes for future generations
- promote effective planning and landscape protection systems in Scotland
- encourage genuinely sustainable development in rural Scotland
- raise awareness of the importance of Scotland's landscapes to its people and economy
- promote the activities of land managers who care for Scotland's landscapes