Rural Affairs, Climate Change and Environment Committee

2nd Report, 2014 (Session 4)


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Rural Affairs, Climate Change and Environment Committee

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CONTENTS

Remit and membership

Executive summary 1
Introduction and background 3
Draft Third National Planning Framework 4
Focus and scope of the draft NPF3 4
Parliamentary procedure for consideration of the draft NPF3 4
Parliamentary approach to scrutiny of the draft NPF3 4
Evidence 5
Issues considered by the RACCE Committee 7
Complementarity with other Scottish Government policies 7
Sustainable development versus sustainable economic growth 7
Embedding low carbon and supporting the delivery of RPP2 8
Supporting low carbon development patterns 10
Climate adaptation and resilience 11
Peatlands 13
Wild land and wind farm developments 16
National developments 20
District heating 23
Waste 24
A sustainable rural Scotland 25

ANNEXE A: EXTRACT FROM THE MINUTES OF THE RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE 31
ANNEXE B: ORAL EVIDENCE AND ASSOCIATED WRITTEN EVIDENCE 33
ANNEXE C: LIST OF OTHER WRITTEN EVIDENCE 34
Rural Affairs, Climate Change and Environment Committee

Remit and membership

Remit:

To consider and report on agriculture, fisheries, rural development, climate change, the environment and other matters falling within the responsibility of the Cabinet Secretary for Rural Affairs & the Environment.

Membership:

Claudia Beamish
Graeme Dey (Deputy Convener)
Nigel Don
Alex Fergusson
Rob Gibson (Convener)
Cara Hilton
Jim Hume
Richard Lyle
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Rural Affairs, Climate Change and Environment Committee

2nd Report, 2014 (Session 4)


The Committee reports to the Parliament as follows—

EXECUTIVE SUMMARY

1. The Committee recognises the importance of the National Planning Framework (NPF) as Scotland’s long term development strategy and welcomes the opportunity to engage in scrutinising the draft third National Planning Framework (NPF3).

2. The Committee considers that the NPF3 has a fundamental role in delivering Scotland’s greenhouse gas reduction targets, in helping its environment and communities adapt to climate change and in ensuring the sustainability of Scotland’s rural communities. The Committee, as one of four parliamentary committees engaged in scrutinising the document, has focused its consideration on how the draft NPF3 will help deliver Scotland’s climate change targets, the policies and proposals set out in the Low Carbon Scotland: Meeting our Emissions Reduction Targets 2013-2027 - The Draft Second Report on Proposals and Policies (RPP2) document and the Scottish Government’s draft Climate Adaptation Programme; and on how the NPF3 will support a sustainable rural Scotland.

3. The Committee thanks the many stakeholders who contributed written and oral evidence and appreciates the cooperation of stakeholders in operating within the tight timescales for consideration of the document.

4. The Committee is broadly supportive of the NPF3 and welcomes the simultaneous production of the NPF3 and the Scottish Planning Policy (SPP). The Committee agrees with those stakeholders who suggest that the tone and language of the document is positive and ambitious and, overall, considers the draft NPF3 to be an improvement on the current NPF2.

5. The Committee welcomes the emphasis on delivering a low-carbon Scotland and on meeting Scotland’s climate targets in both the SPP and the NPF3. However, the Committee shares the concerns of stakeholders in relation to the removal of the statement that the NPF3 will help deliver the Scottish Government’s second Report on Proposals and Policies (RPP2).
The Committee recommends that this is included in the final draft of the NPF3. The Committee notes the statement from the Minister for Local Government and Planning that the framework takes Scotland on a downward trajectory for greenhouse gas emissions and towards a low carbon economy, but considers that the draft NPF3 could be strengthened in a number of areas such as peatland protection, the delivery of zero waste, supporting low carbon patterns of development and the development of a low carbon heat network.

6. The Committee considers that carbon assessments should be required to be carried out for all developments if Scotland is to effectively respond to the challenging targets set out in the Climate Change (Scotland) Act 2009, and in the RPP2, and the Committee recommends that the Scottish Government reflects this in the final NPF3. The Committee also recommends that the carbon impact of every aspect of a wind farm, including the impact of importation and transportation along with carbon payback, should be assessed and recommends that wind farms under 50MW should be included in this requirement.

7. The Committee notes the progress of the work in respect to tackling flooding issues in Scotland but considers that the NPF3 might better reflect the issues around building a climate resilient Scotland and recommends that the Scottish Government gives further consideration to strengthening the NPF3 with regard to this. The Committee also recommends that the final NPF3 is strengthened to ensure it aligns with the delivery of sustainable flood risk management and prioritises the reduction in the overall flood risk in developments, making clear that housing and other forms of development should avoid flood risk areas.

8. The Committee heard from some stakeholders that they believed there were conflicts in the list of national developments in that some supported a move towards a low carbon economy and others did not. However, the Committee notes the view of the Minister for Local Government and Planning and agrees that the list of national developments should be seen as a whole and considered as a matter of balance. The Committee will continue to monitor the issue of carbon emissions within its ongoing scrutiny of a low carbon Scotland.

9. The Committee is disappointed the National Ecological Network was not included in the draft NPF3 and draws the Scottish Government’s attention to its biodiversity strategy\(^1\) where it states that in relation to habitats, species and protected places one of the stated priorities is to “complete the suite of protected places, and improve their connectivity through a National Ecological Network”.\(^2\) The Committee encourages the

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Scottish Government to reflect on the scope to include the National Ecological Network as a national development in the final NPF3.

10. The Committee notes the view of SEPA and others that the final NPF3 could better reflect the importance of the delivery of the zero waste strategy and provide a stronger policy support to this. The Committee recommends that the Scottish Government reflects on the views of SEPA in relation to the importance of the delivery of the zero waste strategy, gives further consideration to how this policy support could be incorporated in the final NPF3, and ensures that the NPF3 provides clarity on the Scottish Government’s expectations for the planning system to support sustainable waste management and resource efficiency.

11. The Committee recognises the need for planning policy to strike the right balance between protecting rural landscapes and ensuring there is a sufficient supply of affordable, sustainable, low carbon, rural housing, located close to public services and driven by housing need. This underpins sustainable rural communities and the Committee encourages the Scottish Government to ensure that the NPF3 and SPP support this.

12. The Committee encourages the Scottish Government to continue to prioritise and support the roll out of digital infrastructure to remote and rural areas and to consider whether there is further scope for the NPF3, and the Scottish Government, to support connectivity for individuals and businesses in rural areas, given the significant costs of this, compared to the costs for those in urban parts of Scotland.

INTRODUCTION AND BACKGROUND

13. The National Planning Framework (NPF) is Scotland’s national spatial planning strategy, setting out where strategic development should take place in Scotland. The NPF also sets out which future national developments the Scottish Government has agreed will be undertaken. (for example the construction of major public infrastructure).

14. The first National Planning Framework (NPF1) was published by the then Scottish Executive on 1 April 2004. The NPF1 was a non-statutory Scotland-wide planning policy document, setting out a spatial strategy for Scotland, along with various national developments. The NPF1 also identified key issues and drivers of change, and set out a vision for Scottish development.

15. The Planning etc. (Scotland) Act, (“the 2006 Act”) placed the NPF on a statutory footing. This requires the NPF to be reviewed by the Scottish Ministers at least once every five years. The current framework, NPF2, came into force in June 2009 and is due to be replaced by the proposed draft third National Planning Framework in June 2014.

DRAFT THIRD NATIONAL PLANNING FRAMEWORK

Focus and scope of the draft NPF3

17. The Scottish Government sets out the spatial strategy for the development of Scotland in the draft NPF3 main issues report (MIR)\(^4\) under four main headings:

- a low carbon place;
- a natural place to invest;
- a successful and sustainable place; and
- a connected place.

18. Under each heading, the Scottish Government outlines its long term vision along with a series of shorter term opportunities which will assist in achieving that vision.

Parliamentary procedure for consideration of the draft NPF3

19. The 2006 Act requires the Scottish Ministers to consult on their review of the NPF, and to lay a draft copy of the revised NPF before the Parliament for consideration. The revised NPF cannot be completed until the period of parliamentary consideration has concluded. Scottish Ministers must also “have regard to any resolution or report of any committee of the Scottish Parliament, made during the period for Parliamentary consideration, as regards the proposed framework.”\(^5\)

20. The 2006 Act also requires parliamentary consideration of the draft NPF to be completed within 60 sitting days from the date on which it is laid.

Parliamentary approach to scrutiny of the draft NPF3

Co-ordinated approach to scrutiny

21. At its meeting on 21 January 2014 the Parliamentary Bureau designated the Local Government and Regeneration (LGR) Committee as lead committee for the consideration of the draft NPF3. Three other committees, the Rural Affairs, Climate Change and Environment (RACCE), Infrastructure and Capital Investment (ICI), Economy, Energy and Tourism (EET) Committees will also be scrutinising

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the draft NPF3 and its impact within their remits and will be reporting separately to Parliament.

*Scrutiny focus of each Committee*

22. The RACCE Committee considered and agreed its’ approach to scrutiny of the draft NPF3 on 11 December 2013 and agreed to focus its consideration on how the draft NPF3 will help deliver—

- Scotland’s climate change targets, the policies and proposals set out in the Low Carbon Scotland: Meeting our Emissions Reduction Targets 2013-2027 - The Draft Second Report on Proposals and Policies (RPP2) document, and the Scottish Government’s draft Climate Adaptation Programme; and

- A sustainable rural Scotland.

23. Other committee’s consideration is set out below—

- LGR Committee: as lead Committee will consider a strategic overview of the planning process and the Framework as a whole;

- EET Committee: planning implications for future onshore wind farm developments, impact on opportunities to utilise onshore reserves of unconventional gas; and

- ICI Committee: planning implications on transport, housing, water services and broadband.

*Briefing on the draft NPF3*

24. The Scottish Parliament Information Centre (SPICe) published a briefing on the draft NPF3 which provided valuable background information for the committees.

*Evidence*

*Written evidence*

25. A call for written evidence was issued by the RACCE Committee on 14 January 2014 with a deadline for submissions of 12 February 2014. The Committee received 34 written submissions.

*Oral evidence*

26. The Committee agreed to consider oral evidence on the draft NPF3 over three sessions. Roundtable stakeholder evidence sessions took place on 29 January 2014 and 5 February 2014. The first evidence session focused on how

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the draft NPF3 will help deliver Scotland’s climate change targets, the policies and proposals set out in the RPP2 document and the Scottish Government’s draft Climate Adaptation Programme. The second evidence session focused on how the draft NPF3 will help deliver a sustainable rural Scotland. This was followed by a final evidence session with the Minister for Environment and Climate Change (Paul Wheelhouse) and the Minister for Local Government and Planning (Derek Mackay).

27. Extracts from the minutes of all the meetings at which the draft NPF3 was considered can be found at Annexe A. Links to the Official Reports of the relevant meetings, along with links to all written submissions can be found at Annexe B.

**Timescales for Parliamentary scrutiny**

28. The Committee thanks all those who provided evidence and appreciates the cooperation of stakeholders in operating within the tight timescales for consideration of the document.

29. The Committee received views in written and oral evidence that stakeholders were concerned that the period of 60 days was insufficient to enable effective scrutiny of the draft NPF3. In oral evidence Aedan Smith from Scottish Environment Link (SE Link) stated—

“I have to wonder whether the Parliament needs to look at this again and think about whether 60 days is enough to cover what are very broad and important issues for the future of Scotland.”

30. Written evidence also indicated that organisations, such as local authorities, which require to have their responses formally approved prior to submission, faced difficulties in submitting substantive responses to the draft document within the existing timescales.

31. The Committee notes the concerns raised by some stakeholders in relation to the 60 day consultation period that, given the significance of the NPF3, they would have welcomed a longer period of time for consideration of the document. The Committee recommends that the Scottish Government reviews the process for consideration of the NPF with a view to extending the timescales for future parliamentary scrutiny to a minimum of 90 sitting days.

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12 COSLA. Written submission.
ISSUES CONSIDERED BY THE RACCE COMMITTEE

Complementarity with other Scottish Government policies

32. In the current parliamentary session the Committee has considered and reported on a number of strategic policy matters, some of which are currently at the implementation stage. The Committee was interested to explore how the NPF3 would fit with other Scottish Government policies such as the RPP2, the climate change adaptation programme, the land use strategy, the national marine plan and the biodiversity strategy. The Committee sought clarity on this from Ministers in the oral evidence session.

33. The Committee heard\(^\text{13}\) from Derek Mackay that while the strategies that have fed into the draft NPF3 are utilised in their own right they are expressed spatially through the draft NPF3 document which sits at the top of the planning hierarchy. The Minister stated that the intention of the final NPF3 is to enable these strategies to inform each other. Paul Wheelhouse also confirmed that from his perspective the NPF3 “very much complements the other strategies that I have responsibility for.”\(^\text{14}\)

34. The Committee believes that complementarity of the NPF3 with other policies such as the RPP2, the climate change adaptation programme, the land use strategy, the national marine plan, the air quality strategy and the biodiversity strategy is essential. The Committee is concerned that some of those policies such as the national marine plan are currently in development and, therefore, it may not be possible to fully consider or reflect those within the framework of the NPF3.

35. The Committee recognises the importance of the NPF3 and believes it needs to be as explicit as possible on how these individual policies will be drawn together. The Committee seeks reassurance from Ministers that the final NPF3 will reflect the individual policies and strategies and will provide links to other appropriate documents supporting strategies such as the RPP2, climate change adaptation, biodiversity, land use, air quality and the national marine plan.

Sustainable development versus sustainable economic growth

36. Several stakeholders expressed concerns that the draft NPF3 gives undue prominence to sustainable economic growth and considered that the way in which this is articulated in the draft document appears to suggest that greater emphasis should be given to economic growth than to the environmental and social components of sustainable development.

37. In its written submission the Royal Town Planning Institute Scotland (RTPI Scotland) said—


“We consider that there is generally a good understanding of what Sustainable Development itself means, what it will look like, and how development can be considered to be sustainable, and would urge Scottish Government to refer to the Brundtland definition of Sustainable Development, as well as the shared UK principles for Sustainable Development, recognising that whilst important, Sustainable Economic Growth is not the only key indicator of Sustainable Development.”\(^{15}\)

38. This echoes concerns raised by other stakeholders and expressed by the Committee in its report\(^{16}\) during its consideration of the Regulatory Reform (Scotland) Bill.

39. The Committee explored these concerns with Ministers and, in his evidence to the Committee, Derek Mackay said—

“Sustainable development and sustainable economic growth absolutely underpin everything in the document. We believe that we can deliver greater growth while protecting the environment at the same time. It is about balance.”\(^{17}\)

40. The Committee notes the concerns of stakeholders regarding the prominence of sustainable economic growth in the NPF3. The Committee considers that sustainable development, as defined by Brundtland, and the shared UK principles for sustainable development, should underpin the NPF3 and be reflected on the face of the document and the Committee welcomes the Ministers comments clarifying the significance of sustainable development underpinning the document.

Embedding low carbon and supporting the delivery of RPP2

41. Much of the Committee’s scrutiny focused on how the draft NPF3 will help deliver Scotland’s climate change targets, the policies and proposals set out in the RPP2 document and the Scottish Government’s draft climate adaptation programme.

42. The Committee received contradictory views from a number of organisations about the way that climate change issues relating to mitigation and adaptation are translated into the draft NPF3.

43. There was strong criticism about how the draft NPF3 integrated with the RPP2. Friends of the Earth Scotland (FoES) stated—

“We welcome the emphasis on delivering a low-carbon Scotland and on meeting our climate targets in both the SPP and NPF. However NPF3 fails to

\(^{15}\) Royal Town Planning Institute Scotland. Written submission.


\(^{17}\) Scottish Parliament Rural Affairs, Climate Change and Environment Committee, Official Report, 19 February 2014, Col 3282.
deliver on these commitments in a number of areas, particularly transport, and SPP does not reflect the urgency of the need to decarbonise throughout the subject sections. The planning system must aim to reduce the need to travel in the first place, promote energy efficient buildings, and prioritise protection and enhancement of key habitats both in relation to mitigation and adaptation.\(^\text{18}\)

44. The written evidence from WWF Scotland expressed disappointment that the draft NPF3 no longer includes the statement that “the NPF3 will help deliver the package of proposals and policies outlined in the RPP2”.\(^\text{19}\) It believes that this weakens rather than strengthens the link to RPP2.

45. However, in its written submission SEPA states that—

“Overall, we consider that the proposed NPF3 provides a high degree of national spatial planning policy support to the delivery of Scotland’s climate change targets and RPP2 policies and proposals”\(^\text{20}\)

46. In providing oral evidence, SEPA suggested that while delivery of the emission reduction targets translated particularly well into the NPF3 for the energy sector, the NPF3 could be strengthened in a number of areas including peatland protection, delivery of zero waste and supporting low carbon patterns of development. SE Link also suggested that opportunities for supporting the development of low carbon heat networks should be embedded in the NPF3.

47. The Committee also heard concerns that the timescales between the NPF3 and the RPP2 do not match up, and that it would be beneficial if both followed the NPF3 timescale of looking ahead over 20-30 years.

48. The Committee raised these concerns with Ministers in the final evidence session. In response, Derek Mackay explained that the purpose of the NPF3 is not to be a “policy compendium”\(^\text{21}\) or a document that is too difficult to understand or one that repeats other Scottish Government strategies. It is primarily a planning document to help guide planners. He went on to say that the NPF3 will set out the planning certainty in terms of what is appropriate for the planning system in relation to certain environmental matters but that it is the responsibility of the relevant Minister to then deliver the strategies on environmental issues. In respect of the issues raised by stakeholders above he stated—

“The strategy in the framework takes us on a downward trajectory for greenhouse gas emissions and the transformation to the low-carbon economy through transport, energy, housing, the proximity of new development and a host of other policies.”\(^\text{22}\)

\(^{18}\) Friends of the Earth Scotland, Written submission.

\(^{19}\) WWF Scotland. Written submission.

\(^{20}\) Scottish Environment Protection Agency. Written submission.


49. In support of this Paul Wheelhouse stated—

“...I would not expect the NPF3 to reflect the full extent of everything that is in the second report on the proposals and policies [RPP2], land use strategy and biodiversity, it supports what I am trying to achieve in my portfolio.”


50. Derek Mackay confirmed that while a substantial amount of effort and attention has been paid to wind energy policy in the draft NPF3 this a reflection of the requirement for clarity and guidance, partly due to the controversial nature of such developments. He added—

“However, that is not to say that wind energy is more of a priority than other forms of energy generation; rather, that it is just that more narrative and guidance are required to help navigate through the issues. We cover that as fully as we can as part of the NPF3, but the further work that lies behind the issues is for the relevant Minister.”

51. The Committee welcomes the emphasis on delivering a low-carbon Scotland and on meeting Scotland’s climate targets in both the SPP and the NPF3. However, the Committee shares the concerns of stakeholders in relation to the removal of the statement that the NPF3 will help deliver the package of proposals and policies outlined in the RPP2. The Committee recommends that this is included in the final draft of the NPF3.

52. The Committee notes the statement from the Minister for Local Government and Planning that the framework takes Scotland on a downward trajectory for greenhouse gas emissions and to a low carbon economy, but considers that the NPF3 could be strengthened in a number of areas such as peatland protection, the delivery of zero waste, supporting low carbon patterns of development and the development of a low carbon heat network. The view of the Committee on these issues is set out later in the report. The Committee seeks re-assurance from Ministers that the NPF3 and SPP adequately reflect the urgency of the need to decarbonise throughout the subject sections.

Supporting low carbon development patterns

53. The Committee received evidence on how the NPF3 could be strengthened to better support low carbon developments. In oral evidence to the Committee Paula Charleson from SEPA suggested that—

“...We already have a tool: with SEPA and others, the Scottish Government has developed the spatial planning assessment of climate emissions—SPACE—tool, which was applied in the strategic environmental assessments for the national developments....I think that NPF3 could go further and suggest that a carbon assessment should be conducted for all developments, so that people have an understanding of their impacts. SPACE allows for
options appraisal in the siting of housing, industrial developments and so on. I do not think that NPF3 is strong enough on that.”

54. This was supported by Aedan Smith of SE Link who suggested that there could be a requirement placed on local authorities, when considering applications for major developments, to take into account both the carbon impact of the development and how it will help Scotland meet its carbon reduction targets. This point was also made by Stop Climate Chaos Scotland in its written evidence to the Committee.

55. The Committee explored the issue of carbon assessment in the evidence session with the Ministers. In response to the suggestion that a requirement could be placed on local authorities to consider how their development plans support emission reduction targets and how the NPF3 could be better strengthened to support low carbon developments by requiring carbon assessments to be conducted for all major developments, Derek Mackay said—

“… for any development, a proportionate assessment of the environmental impact must be carried out. Some developments may not be on a scale that would require an assessment to be made in any great detail, but for major developments, as Claudia Beamish mentioned, an environmental impact would be expected, and any assessments that are relevant to the application would be made. There is therefore, at present, an assessment of the impact on the environment.”

56. Derek Mackay added that local development plans are already required to assess how they will support low carbon living but what posed the greatest uncertainty was that the number of applications which could be made was unknown and therefore the total impact could not be guaranteed. Paul Wheelhouse agreed the current planning system could be used to influence Scotland’s performance in achieving its greenhouse gas emissions targets.

57. The Committee notes the response from the Minister for Local Government and Planning on how the NPF3 will support low carbon development patterns and welcomes the clarification from the Minister that a requirement for local development plans to assess how they will support low carbon living already exists. However the Committee considers that carbon assessments should be required to be carried out for all developments so that Scotland can effectively respond to the challenging targets set out in the Climate Change (Scotland) Act, and in the RPP2, and the Committee recommends that the Scottish Government reflects this in the final NPF3.

Climate adaptation and resilience

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27 Stop Climate Chaos Scotland. Written submission.
58. The Committee recently considered the Scottish Government’s draft Scottish climate change adaptation programme which aims to increase the resilience of Scotland’s people, environment and economy to the impacts of a changing climate. The Committee understands that there are significant challenges for Scotland in effectively adapting to climate change. These challenges are recognised by stakeholders and the Committee received evidence in relation to the NPF3 and climate change adaptation.

59. In oral evidence Peter Hutchinson of Scottish Natural Heritage (SNH) welcomed the NPF3’s emphasis on green infrastructure—

“With regard to climate change adaptation, we welcome NPF3’s emphasis on green infrastructure and think that the creation of woodland, sustainable drainage and other such practical measures are very important if we are to create a resilient environment.”

60. However, Glasgow City Council and SEPA both highlighted that NPF3 could also better reflect broader issues around building a climate resilient Scotland. Alistair Brown of Glasgow City Council stated that—

“There is also very little in the document about resilience. The Glasgow strategic drainage plan is very much focused on resilience and climate resilience in the coming years. However, that is only one aspect of resilience and climate resilience in the next 20 to 30 years. Climate resilience will be about not just drainage and water, but transport, communications infrastructure and sustainable buildings. Resilience planning will be an important part of what any city does in the coming years.”

61. SEPA’s Paula Charleson suggested that the NPF3 should be strengthened to support stronger action on flood risk—

“With regard to flooding, although SEPA supports the recognition in NPF3 of the importance of catchment scale in flood risk management areas…we think that the framework should be strengthened to ensure that it aligns more strongly with the delivery of sustainable flood risk management in general and that, as a minimum, one priority should be to reduce overall flood risk in developments in Scotland to support the flood risk management process. Indeed, I would almost go so far as to suggest that it be made clear that housing and other types of developments should avoid flood risk areas wherever possible.”

62. The Committee also heard of the importance of recognising that tackling climate change requires local authorities and their partners to work together on a regional basis as action in one area in a river catchment may well impact on another area further along that same catchment.

63. Paul Wheelhouse provided the Committee with an update on the different pieces of work that are ongoing in relation to flood risk management. The flood risk and hazard maps help inform the planning process by helping the determination of where residential property and business development would or would not be appropriate. He confirmed that the Scottish planning policy has been revised to reflect flood risk and that flood risk has been identified as a national issue in the NPF3 and this acts as a signpost to planners and developers that there is an overarching climate change strategy.

64. Derek Mackay stated that—

“NPF3 may not set out where the flood risks are, but those are dealt with in planning advice notes, which lie behind this work. For some, NPF3 will almost be an investment document. Flood risk, water attenuation and waste would be considered in any planning decisions on drainage and infrastructure.”

65. In relation to the importance of other infrastructure Paul Wheelhouse added—

“Obviously, the point that was made about critical infrastructure, such as energy infrastructure, is absolutely right. We need an overview of the resilience of those infrastructure investments as well.”

66. The Committee notes the update from the Minister for Environment and Climate Change on the progress of the work in respect to tackling flooding issues and the explanation of how the NPF3 works as a signpost for planners and developers to this work. However, the Committee considers that the NPF3 might better reflect the issues around building a climate resilient Scotland. The Committee recommends that the Scottish Government gives further consideration to strengthening the NPF3 with regard to these issues.

67. The Committee also recommends that the final NPF3 is strengthened to ensure it aligns with the delivery of sustainable flood risk management and prioritises the reduction in the overall flood risk in developments, making clear that housing and other forms of development should avoid flood risk areas.

Peatlands

Protection and restoration of peatlands

68. The Committee recognises the significant contribution of Scotland’s peatlands to carbon abatement and to meeting the emissions reduction targets set out in the RPP2. A number of the submissions received by the Committee outlined support for the recognition given to the importance of peatlands in the NPF3. In its written evidence SNH stated—

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“We welcome NPF3 recognition of the contribution of peatlands – in particular through restoration – to meeting Scotland’s climate change targets.”

69. The Committee also heard that the protection of peatlands is equally as important as its restoration. Some stakeholders put forward suggestions on how peatland protection could be strengthened in the NPF3, particularly in relation to the carbon assessment of developments and the Committee discusses this below.

70. The Committee heard that the draft NPF3 specifically mentions the relevance of peatlands to the North and North-West of Scotland and it was suggested by stakeholders that this is widened to take into consideration peatlands in the rest of the country. The Scottish Wildlife Trust, for example, stated in their written submission that many lowland raised bogs are found in the Borders and Central Belt areas. This was a view echoed by SE Link in its oral evidence to the Committee.

71. In discussion with the Minister, Paul Wheelhouse confirmed to the Committee that there is a general need to improve the condition of peatlands wherever they are in Scotland, and he agreed that there are opportunities to improve the conditions of bogs in the south and central belt. He added that work is ongoing to develop the peatland code which, he stated, will help develop the tools and approaches required to work with land managers on both small and large scale landholdings throughout Scotland.

72. He also confirmed that work is ongoing by the Forestry Commission to develop a more modern approach to forestry whereby it takes the condition of peatlands into account when designing new forestry schemes and actively looks for opportunities to improve or restore peatlands on land under its control.

73. The Committee recognises the importance of peatlands and their contribution to meeting Scotland’s climate change targets and welcomes the reflection of this in the NPF3. The Committee also recognises that the protection of existing peatlands is as important as peatland restoration. The Committee welcomes clarification that the commitment to peatland restoration set out in NPF3 encompasses peatlands across Scotland, and not solely the North and North West Scotland. The Committee is encouraged to hear that work is ongoing on the peatland code and would welcome an update on progress in developing and rolling out the code to land managers.

Requirement for carbon assessments for developments on peatlands

74. The Committee received evidence on the need for carbon assessments for proposed developments on peatland.

75. SEPA noted that although a carbon assessment calculation is required for larger wind farms of 50 MW or above many wind farms are being developed that fall under this threshold and therefore are not subject to the carbon calculation. In

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34 Scottish Natural Heritage. Written submission.
35 Scottish Wildlife Trust. Written submission.
oral evidence to the Committee SEPA also noted that the impact of other developments on peatland should also be considered—

“There is, however, the opportunity for more assessments to be undertaken, and not just for wind farms. It is odd that we require assessments only for wind farms—why is that?”\(^{37}\)

76. This was supported by Aedan Smith of SE Link who said—

“It is important not to single out wind farms, which always end up dominating the discussion in Scotland, as they have for the past few years. Developments in other sectors cause damage to peatlands if they are in the wrong place, whether they are housing developments, supermarkets or ... opencast coal mining which often has a big interaction with peatlands. The carbon balance of a coal mine is slightly different from the carbon balance of an onshore windfarm.”\(^{38}\)

77. In discussion with the Minister the Committee raised the issue of extending carbon assessments to wind farms below 50MW and to other developments on peatland and explored the scope for extending the carbon assessments of wind farms to include the carbon impact of importing parts for the wind turbines and transportation of these to site. In response Derek Mackay suggested that for any development a proportionate assessment of environmental impact must be carried out.

78. **The Committee recommends that carbon assessments should be required for all developments on peatlands. The Committee also recommends that the carbon impact of every aspect of a wind farm, including the impact of importation and transportation along with carbon payback, should be assessed and recommends that wind farms under 50MW should be included in this requirement.**

**Peat depth**

79. The Committee considered the scope to capture information on peat condition and depth via the detailed data gathered by private developers, as part of their environmental impact assessments, when they are seeking to develop wind farms. The Committee considered this could be used to provide information that would aid understanding of the depths of peat.

80. The Committee discussed this with Derek Mackay who agreed that the roll out of scientific tools that helps inform decisions in respect of both large and smaller scale developments is beneficial and that the Scottish Government encourages the use of best practice in this respect.

81. Paul Wheelhouse agreed that the level of detail of the environmental assessments undertaken by private developers gives an opportunity to capture useful information in relation to peat condition and depth. He agreed that as this

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information has already been presented as part of the planning process it provides an opportunity for the Scottish Government and SNH or other stakeholders to collect it and use it to good effect.

82. The Committee welcomes the recognition of the scope to make use of the information gathered by potential private developers to assist understanding of the condition and depths of peat. The Committee looks forward to hearing more on how this has been encouraged and used by the Scottish Government, SNH and other stakeholders.

**Peatland map**

83. The Committee received evidence in relation to the peatland map which the Committee understands had previously been included in the MIR. SE Link noted in its written evidence that—

“Recognition of the benefits of peatland restoration is welcome but it is not clear how this will be delivered….There seems to have been a downgrade in the importance of peatlands from the MIR, which for example, included a map on peatland depth.”

84. The Committee raised concerns with the Ministers over the missing peatland map and sought clarification on why it had not been included in the draft NPF3.

85. Derek Mackay explained that the difficulty with providing maps is that they may not cover everything that requires to be covered and, in his view, on that basis a peatland protection policy provides greater protection as it will apply in every instance where a decision is to be taken with regards to peatlands.

86. The Committee considers that it was important to have the best possible information available when consulting on the draft NPF3 and that the map on peatland depth has been a useful tool in aiding the consultation process. However, as a strategic policy document, the Committee considers that the inclusion of such detailed maps, which may be subject to change, in the final NPF3, is unnecessary.

**Wild land and wind farm developments**

87. The Committee received a number of submissions relating to work commissioned by SNH which identified core areas of wild land.

88. The importance of wild land was recognised by FoES, by the John Muir Trust and by the Association for the Protection of Rural Scotland (APRS). In its written evidence FoES expressed the view that the SNH core area of wild land map would provide valuable guidance. However, it went on to suggest—

“There is a need for special consideration for community owned energy developments such as wind or hydro schemes…..the map should not become a rigid tool that enables those who do not reside locally to discriminate against rural communities who wish to decrease their

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39 Scottish Environment Link. Written submission.
dependence on fossil fuels and therefore accept renewable energy as part of their landscape.\textsuperscript{40}

89. The John Muir Trust (JMT) provided written evidence\textsuperscript{41} to the Committee stating the importance of areas of wild land to Scotland’s tourist industry and the rural economic benefits that arise from that. The JMT called for the core area of wild land map to be included in the final NPF3 as it considers wild land to be a valuable asset which should be protected.

90. The APRS also called\textsuperscript{42} for these areas of wild land to be identified in the map on page 29 of the draft NPF3 alongside National Parks and National Scenic Areas as areas where large scale wind farm developments should be avoided. A contrary view was expressed in Scottish Power’s written evidence\textsuperscript{43} to the Committee which argued against taking such an approach Scottish Power believes the mapping exercise has not been “sufficiently rigorously tested” and that it failed to differentiate between different levels of wildness.

91. This issue was discussed further at the Committee’s meeting on the 5 February 2014\textsuperscript{44}, and the APRS explained that SNH had carried out an additional consultation on its approach to identifying wild land, that responses had now been analysed, and that the Scottish Government had yet to take a final position on the issue.

92. The Committee sought clarification from the Ministers on whether the core areas of wild land would appear in the final draft of the NPF3.

93. Derek Mackay and Paul Wheelhouse clarified that the term “wild land” is being used in relation to wind developments and turbines and that it is not a wider designation of wild land as has been possibly misinterpreted by some stakeholders. In their view the identification of land as a core area of wild land does not mean that there is a ban on development taking place, development can still take place as long as it can be done in a way that it is fully mitigated and the environment can be protected.

94. Paul Wheelhouse said that it is still possible for renewable projects to be located in areas covered by the wild land map as long as they can be mitigated with regard to their landscape impact and other impacts. He gave the example of Comhairle Nan Eilean Sair which raised concerns about the implications for wider development in its area if a designation was applied to land identified as a core area of wild land. Derek Mackay added—

\textsuperscript{40} Friends of the Earth Scotland. Written submission.
\textsuperscript{41} John Muir Trust. Written submission.
\textsuperscript{42} Association for the Protection of Rural Scotland. Written submission.
\textsuperscript{43} Scottish Power. Written submission.
\textsuperscript{44} Scottish Parliament Rural Affairs, Climate Change and Environment Committee, \textit{Official Report}, 5 February 2014, Col 3254.
“No part of Scotland will be declared dead by the Government – every part should be alive to sustainable development.”

95. In respect of the inclusion of the core areas of wild land in the NPF3 Derek Mackay explained to the Committee that SNH is currently consulting on its analysis and its maps and that it would be wrong to prejudice this work by including it in the draft NPF3. He indicated that once the analysis of the work is complete the Scottish Government will formulate a final position. The timescale this is before the conclusion of the Scottish planning policy review (by June 2014). He stated that as Parliamentary scrutiny of the NPF3 will be complete by this time, in his view it is not appropriate for core areas of wild land to be included in the document.

96. The Committee understands the benefits of identifying core areas of wild land in Scotland in relation to directing the siting of wind energy developments and turbines, and considers that there will be some areas of wild land in which large scale wind energy developments would be inappropriate and should be avoided. The Committee also recognises that there may be a requirement for some development in these areas, particularly community owned energy developments, and welcomes the reassurance provided by the Ministers that development in an area which appears on the core areas of wild land map will not be prohibited as long as the impacts are appropriately mitigated.

97. However, the Committee is concerned with regard to the timing of the SNH consultation on the analysis and map. The Committee believes it would have been helpful to have had the analysis and the finalised core areas of wild land map available to assist the consultation process. The Committee understands that, once finalised, this will provide valuable guidance on the siting of possible wind energy developments. The Committee requests further information from the Scottish Government with respect to the status of the finalised map and its relationship to the SPP and NPF3.

Separation distance and neighbour notification distance for wind energy developments

98. The Committee explored with the Ministers the proposal contained in the Scottish Planning Policy consultation document to increase the separation distance between communities in cities, towns and villages, identified in local development plans, and wind energy developments, from 2km to 2.5km. The Committee also had concerns about how smaller settlements were taken into account when measuring the separation distance.

99. Derek Mackay agreed that the proposal to increase the separation distance could have unintended consequences for some communities, for example it could lead to the prevention of turbines in some areas where they could help sustain local economies through community ownership and community benefit. He was

also in agreement that work was required in order to provide a definition of a settlement.

100. In relation to the Western Isles he stated that—

“The impact of such a policy there might be that very few areas [of the Western Isles] could be developed by turbines, which might be contrary to what local communities want. It would be wrong for us in Edinburgh to create policies that have such a disproportionate effect on other parts of the country, so the policy approach has to be far more sensitive.”

101. He confirmed that for this reason the Scottish Government had commissioned work into separation distances to obtain an “evidence based methodology” of what is appropriate for different areas taking into account local landscapes and environmental considerations. The Minister confirmed that the final position on the issue will be included in the forthcoming Scottish Planning Policy, which is due for publication in June 2014.

102. The Committee notes that there could be unintended consequences of the proposal, contained in the Scottish Planning Policy consultation document, to increase the separation distance between communities defined in local development plans and wind farms, from 2km to 2.5km. The Committee notes that further research is being undertaken in relation to this proposal and the definition of settlements and it supports an approach which will be sensitive to the circumstances of local communities. The Committee understands the outcome of this research will inform the final Scottish Planning Policy.

103. The Committee also raised a concern about the level of awareness of proposals and applications for wind developments in rural areas. The current planning rule, under the provisions of the Town and Country Planning (Scotland) Act 1997, allows applications for wind turbines with a generating capacity of 50 MW and under to be considered and authorised by planning authorities. Under this provision, planning authorities are required to notify neighbours whose land is within 20m of the boundary of the land where the wind turbine development is proposed. In a rural context this means there is often no requirement to notify those living closest to the proposed development as they are located over 20m from the boundary. Therefore there can often be a lack of awareness in rural communities that an application has been made to the planning authority.

104. Derek Mackay confirmed that, in response to a Public Petition which had been lodged with the Parliament in April 2013, the Scottish Government had

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50 Scottish Parliament, Public Petition PE01469. Available at: http://external.scottish.parliament.uk/gettinginvolved/petitions/turbineneighbournotification
agreed to roll out good practice about what developers should do to make others aware of proposed wind developments in the local area. He stated—

“We have asked developers and our partners in SNH to consider the best practice guidance on raising awareness of wind farm developments in local areas.”\(^{51}\)

105. **The Committee welcomes the commitment of the Scottish Government to work with Scottish Natural Heritage and developers to produce best practice guidance on raising awareness of proposed wind energy developments in local areas and looks forward to the publication and roll out of the guidance.**

**National developments**

106. The Committee received evidence from a number of stakeholders in relation to national developments and their inclusion in the NPF3.

107. In oral evidence Bruce Wilson of SE Link expressed disappointment that the National Ecological Network (NEN) had not been included as a national development, noting that—

“We at SE Link support the active travel parts of the CSGN (Central Scotland Green Network), but there is not a lot in the green network about biodiversity, which is key for helping species to adapt, or about networks across the landscape … We would have liked to see a national ecological network to help those species move throughout the landscape and to ensure that it is not just the central belt that we are concentrating on when it comes to biodiversity, as well as such things as adapting to flooding … We need green infrastructure in the upper catchments and a national ecological network could help to deliver that.”\(^{52}\)

108. In evidence SEPA also suggested that it would like to see a NEN in the next national planning framework—

“We support the NPF’s support for the central Scotland green network. It does not go so far as to say that a national ecological network should be established but, nevertheless, it says that that is an aspiration. That is important, and we hope that it will appear in the next national planning framework.”\(^{53}\)

109. The Committee sought clarification on why the NEN had not been included in the list of national developments. Derek Mackay stated that while the Scottish Government values the importance of the NEN, it was unclear how it could meet

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the criteria for national development status primarily because that status is about assisting with consent and giving certainty within the planning system and the NEN is more of a concept than something which would benefit from national development status. The Minister said that while the NEN met some of the criteria it did not meet enough of them to achieve final status.

110. Paul Wheelhouse added that the Scottish Government continues to place a high value on achieving Scotland’s biodiversity strategy; he confirmed that work is underway by networks of local biodiversity action plan officers in this respect.

111. The Committee notes the position of the Minister for Local Government and Planning on the reasons why the National Ecological Network was not included in the final list of national development in the NPF3. However, the Committee is disappointed the National Ecological Network was not included in the draft NPF3 and draws the Scottish Government’s attention to its biodiversity strategy\(^54\) where it states that in relation to habitats, species and protected places one of the stated priorities is to “complete the suite of protected places, and improve their connectivity through a National Ecological Network”.\(^55\) The Committee encourages the Scottish Government to reflect on the scope to include the National Ecological Network as a national development in the final NPF3.

112. In evidence to the Committee, Glasgow City Council\(^56\) and SNH\(^57\) highlighted support for the inclusion of the Metropolitan Glasgow Strategic Drainage Partnership (MGSDP) as a national development. Argyll & Bute Council outlined support for the inclusion of pumped storage hydro and better recognition for active travel as a national development and SE Link welcomed the continued retention of the Central Scotland Green Network (CSGN) as a National Development and the inclusion of long distance walking/cycling routes. In written evidence SEPA also noted that—

“… the NPF3 will support the delivery of RPP2 emission reduction actions for the energy sector through an enabling planning framework for the delivery of renewable energy infrastructure, a High Voltage Electricity Transmission Network and upgraded fossil fuel thermal generation capacity fitted with Carbon Capture Storage, all of which are set out as national developments in the proposed NPF3.”\(^58\)

113. Aedan Smith of SE Link suggested that some of the national developments were contrary to the goal of securing a low carbon place and risk driving up emissions—


\(^{56}\) Scottish Parliament Rural Affairs, Climate Change and Environment Committee, Official Report, 29 January 2014, Col 3225.

\(^{57}\) Scottish Natural Heritage. Written submission.

\(^{58}\) Scottish Environment Protection Agency. Written submission.
“Some SE Link members are concerned that there are contradictions in the framework … It contains very positive words about some things that can be done for adaptation and positive words about the benefits of renewable energy. It also includes some developments that will result in increases in carbon emissions if they go ahead as they stand. Those contradictions have perhaps not been fully addressed.”

114. This point was also raised by in written evidence by Stop Climate Chaos Scotland which stated—

“We believe there are significant contradictions in the draft NPF3...Scotland cannot be low carbon and have an economy based heavily on fossil fuel extraction and high carbon travel.”

115. In response to the point on contradictions Derek Mackay stated—

“Some individual developments might increase emissions but they will be offset by the overall policy approach, which involves the decarbonisation of transport, the reductions of emissions through energy use and other initiatives that should bring emissions down.”

116. The Committee heard from some stakeholders that they believed there were conflicts in the list of national developments in that some supported a move towards a low carbon economy and others did not. However, the Committee notes the view of the Minister for Local Government and Planning and agrees that the list of national developments should be seen as a whole and considered as a matter of balance. The Committee will continue to monitor the issue of carbon emissions within its ongoing scrutiny of a low carbon Scotland.

117. The Committee understands that the Economy, Energy and Tourism Committee will be considering and reporting on energy issues in relation to the draft NPF3. However evidence received by this Committee from SEPA notes that the NPF3 will support the delivery of RPP2 emission reduction actions in the energy sector, including carbon capture and storage. The Committee sought reassurances from the Scottish Government that environmental safeguards relating to air quality and emissions would be put in place in respect of the carbon capture and storage plants found in the list of national developments.

118. Paul Wheelhouse provided assurances that the European Commission’s Directive on industrial emissions would apply and that SEPA would have responsibility for enforcement. He also stated his expectation that SEPA would take a “rigorous approach” to ensuring the EC Directive was applied and would

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60 Stop Climate Chaos Scotland. Written submission.
work closely with the site operators to ensure compliance rather than have to deal with issues of non-compliance.

119. The Committee welcomes the reassurance provided by the Minister for Environment and Climate Change that the strategic environmental impact assessment required for carbon capture and storage plants will consider the potential impact on air quality.

120. Although not a national development the Committee explored the issue of unconventional gas extraction (coal bed methane and hydraulic fracturing), related impacts such as methane leakage from wells, and the potential major impact this could have on communities. These concerns were reflected in evidence from Scottish Environment LINK which, in its written submission, calls on the Scottish Government to invoke the precautionary principle in relation to coal bed developments until climate and other environmental and health concerns are fully addressed.

121. The Committee explored this with Ministers who confirmed that—

“...we in Scotland have taken the view that we need to ensure that appropriate safeguards are in place, should any opportunity arise, so that unconventional gas is robustly regulated. We want to give confidence to communities and the public in Scotland that such opportunities will be taken only when to do so would be consistent with the regulatory constraints.”

122. The Committee also raised concerns with regard to the restoration and aftercare of sites and the requirement for restoration bonds. The Committee understands that planning authorities can set conditions for the restoration of land as part of planning approvals, but that this relates only to land use.

123. The Committee welcomes confirmation from the Minister for Local Government and Planning that local planning authorities will be able to determine the appropriate buffer zone and separation distance for unconventional energy extraction in the light of local circumstances. The Committee also welcomes the reassurance from the Minister that ongoing work and consultation on mineral and coal extraction on the remediation of land (both above and underground) will inform the development of the revised SPP.

District heating

124. The Committee understands that the EET Committee is considering energy matters in relation to the NPF3 and did not specifically seek views on the NPF3 and energy matters. However, the written submission from WWF Scotland contained comment on the progress of district heating in Scotland. WWF Scotland highlighted a concern that to date district heating has progressed in Scotland in an ad hoc way and expressed its disappointment that it had been omitted from the

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64 WWF Scotland. Written submission.
NPF3 as its inclusion would have provided a valuable opportunity to make progress.

125. The Committee raised this with Derek Mackay who confirmed that Point 11 of the action programme for the NPF3 sets out that a Scotland heat map will be published in 2014 and that work will be undertaken with local partners to produce a heat map area for every local authority area.

126. The Committee notes that the development of a detailed heat map for Scotland is a key action in the plan and looks forward to receiving information on how the map will be taken into account in the planning of new developments and how it will help meet the district heating targets.

Waste

127. The Committee received evidence from a number of stakeholders on the reflection of zero waste aspects in the NPF3. SEPA and Glasgow City Council suggested that the NPF3 could better reflect the importance of delivering on zero waste. SEPA suggested that—

“NPF3 could provide stronger policy support to the delivery of Zero Waste by outlining, in a national, spatial context, the Scottish Government’s expectations for the planning system to support sustainable waste management and resource efficiency.”

128. Derek Mackay disagreed with this on the grounds that the NPF3 is a spatial expression of the Scottish Government’s strategy and, in his view, it would be “wholly wrong” for it to propose individual sites for waste to energy plants or to include the zero waste strategy in the NPF3.

129. Calum Davidson from Highlands and Islands Enterprise told the Committee that there needs to be a refocus on waste in Scotland so that it is “seen not as a problem but as an opportunity.”

130. Derek Mackay agreed that there is currently a lack of a joint approach by local authorities and considered there is greater potential to have shared services and collaboration to improve ways of delivering the zero waste strategy.

131. The point made by SEPA above was acknowledged by Paul Wheelhouse, however he went on to explain that both the Scottish Government and SEPA were in agreement that further work would be needed to identify what was actually required. He confirmed that the Cabinet Secretary for Finance, Employment and Sustainable Growth and Derek Mackay are working with local government to identify how a greater consistency of product can be achieved while developing the associated industries in Scotland to reprocess the material, thereby generating jobs and value in Scotland’s economy.

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65 Scottish Environment Protection Agency. Written submission.
132. Paul Wheelhouse also stressed the importance of capturing the value of raw materials—

“We want to improve the quality and consistency of the recyclate material and ensure that we process it in Scotland. We must not lose the value of the raw materials, which are leaving the country to be reprocessed in other parts of the world where we have little control over what happens to them. We must capture their value.”  

133. Calum Davidson of HIE provided the Committee with an example of how this has been taken forward in Shetland. He indicated that it is very expensive to ship glass off the island and consequently a company has been set up which turns the glass into gravel and sand that is then used by the local building industry.  

134. The Committee notes the view expressed by both Ministers that it would not be appropriate to include the zero waste strategy in the NPF3 on the grounds that the NPF3 is a spatial document. However the Committee heard from SEPA and others that the final NPF3 could better reflect the importance of the delivery of the zero waste strategy and provide a stronger policy support to this.  

135. The Committee recommends that the Scottish Government reflects on the views of SEPA regarding the scope for the NPF3 to provide stronger policy support to the delivery of the zero waste strategy and gives further consideration to how this policy support could be incorporated in the final NPF3. The Committee also recommends that the Scottish Government ensures that the NPF3 provides clarity on its expectations for the planning system to support sustainable waste management and resource efficiency.  

136. The Committee has previously taken evidence on the concept of a circular economy and will return to this as part of its future work programme. The Committee notes with interest the views expressed by the Minister for Environment and Climate Change in relation to the importance of a circular economy.  

A sustainable rural Scotland  

Community ownership  
137. The First Minister has set a target of having one million hectares of land in community ownership by 2020. This target is not mentioned on the timeline in NPF3 on pages 58-59. The NPF3 includes a reaffirmation of the Government’s target of having 500MW of renewable energy capacity in community ownership by 2020.  

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138. In the written evidence the Committee received, and at the meeting of the 5 February 2014, there was discussion\(^{70}\) about the importance of ownership of assets by communities for rural development. Examples were given of Gigha and Eigg where community ownership of the land asset has enabled other development to take place. The Committee sought clarification from the Ministers on whether or not they considered community ownership of assets to be an important driver of rural development and, if so, how that had been reflected in the NPF3.

139. Paul Wheelhouse confirmed that the Scottish Government views community ownership as very important and reiterated the First Ministers’ targets, which he thought were “difficult but achievable”.\(^{71}\) He confirmed that the Land Reform Review Groups’ report should be available at the beginning of April and stated that land use and land reform work together and should not be viewed in isolation.

140. Derek Mackay told the Committee that community ownership will not be addressed through the planning system but through legislation such as the forthcoming community empowerment and regeneration bill. He added that while the planning system does not take account of ownership when determining land use it can take account of the economic impact and community benefit of certain decisions.

141. The Committee notes that community ownership will be addressed in the forthcoming community empowerment and regeneration bill. The Committee recommends that the targets for community ownership, set by the First Minister, should be reflected in the action programme in the final NPF3.

**Rural housing**

142. The Committee understands that the ICI Committee is considering housing matters, however, evidence was received by the RACCE Committee in relation to rural housing and its importance in underpinning sustainable rural communities. Written evidence from the Association of the Protection of Rural Scotland (APRS) and Scotland’s Rural College (the SRUC) touched on different aspects of the rural housing debate. The APRS called for new housing development to be concentrated where possible in existing settlements, to reduce landscape impacts, while the SRUC emphasised the importance of affordable housing to secure a sustainable future for rural communities. It called on the Scottish Government to provide additional support for affordable housing in rural areas.

143. In response to the Committee’s question on whether or not the NPF3 and the Scottish planning policy strikes the right balance between protecting rural landscapes, and ensuring that there is a sufficient supply of affordable housing, Paul Wheelhouse said—

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“Housing is a key component in ensuring that we have, as I mentioned in my opening remarks, vibrant rural communities that people enjoy living and working in...It is a very important aspect of policy.”

144. The Minister was of the view that the NPF3 supports such development and the detail is contained in the Scottish Planning Policy. This view was supported by Derek Mackay who confirmed that planning authorities are expected to ensure that a generous supply of land is available to meet local housing need and he agreed that it was important to “get the right developments in the right places.”

145. Derek Mackay also agreed that to do so may require planners to have the ability to be flexible in relation to the quota of how much of a site should be allocated to affordable housing as it was important that the people living in the affordable housing had access to public transport and other facilities. The Committee understands that the question of a flexible quota, where the level of affordable housing required as part of a housing development should generally be no more than 25%, is being consulted on as part of the review of the Scottish Planning Policy. On the same matter Paul Wheelhouse agreed it was important to encourage development to be located where people are able to make use of the existing public transport infrastructure.

146. The Committee recognises the need for planning policy to strike the right balance between protecting rural landscapes and ensuring there is a sufficient supply of affordable, sustainable, low carbon, rural housing. The Committee considers that the provision of affordable, sustainable, low carbon, rural housing, located close to public services, and driven by housing need, underpins sustainable rural communities. The Committee encourages the Scottish Government to ensure that the NPF3 and Scottish planning policy supports this. The Committee would welcome an update on the outcome of the current consultation on the review of the Scottish planning policy with regard to the flexible quota for affordable housing.

Coastal areas and islands
147. The overall spatial strategy set out in the first section of the NPF3 makes a distinction between three types of area, one of which is coastal areas and islands. The NPF3 states that Scotland’s coasts and islands have “an unprecedented opportunity to secure growth from renewable energy generation, which will bring employment, and reverse population decline.” The Committee is aware that Scottish Power recently ended its involvement in the planned Tiree array, and

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Scottish and Southern Energy has announced it will review its involvement in offshore renewables this year.\textsuperscript{76}

148. On this basis the Committee expressed its concern about what opportunities are available to support rural development in coastal and island communities should offshore renewables not progress as quickly as expected and the Committee sought clarity from the Ministers on how the NPF3 could better reflect this scenario.

149. Derek Mackay explained how the NPF3 was drafted to provide a balance, a mix of opportunities and to give greater certainty and, in his view, how the NPF3 has connected the national planning framework and land use more effectively with the marine strategy and marine opportunities. He stated that some developments are wholly dependent on the private sector bringing forward proposals and the Scottish Government is confident that if one individual project does not proceed then there is potential for other developments and industries to step in and, in his view, the certainty provided by the NPF3 will encourage this.

150. This view was supported by Paul Wheelhouse who spoke of parallel approaches such as the land reform process, community empowerment and the focus on creating towns as service centres and hubs of economic activity which, he considered, will benefit islands, coastal communities and the mainland communities equally. In his view, while these activities are happening in parallel to the NPF3 it cannot be expected that the NPF3 would address them all individually.

151. The Committee notes the view of the Scottish Government on how the NPF3 should ensure planning certainty for future developments and industries. However, the Committee remains concerned about uncertainties in the speed of progress in the development of offshore renewables, and considers that the potential alternative opportunities to support rural development in coastal and island communities are not fully explored in the draft NPF3. The Committee urges the Scottish Government to give further consideration to this.

National parks

152. At its meeting on 5 February 2014\textsuperscript{77}, the question of whether the NPF3 should include plans to designate an additional national park was discussed by stakeholders. The APRS made a case for this in a report entitled “Unfinished Business” which it produced in 2013. Other panellists were more circumspect, pointing out that the future of rural Scotland out with national parks needs to be considered. The fact that national parks can be a spur for rural development was also raised.

153. The Committee sought clarification on what consideration the Scottish Government had given to including the designation of additional national park(s) in the NPF3 and Paul Wheelhouse confirmed that there had been some, but not a


\textsuperscript{77}Scottish Parliament Rural Affairs, Climate Change and Environment Committee, Official Report, 5 February 2014, Col 3258.
large amount, of correspondence in support of new national parks. He confirmed that as Minister with responsibility for national parks he had held some meetings with stakeholders, but as yet there was no clear view from them on what the business case or set up would be for a new national park. At this stage the Scottish Government had no plans for the designation of any further national parks.

154. The Committee notes the confirmation that the Scottish Government has no plans to create new national parks at this time, but understands there may be interest in some areas to discuss the scope for, and benefits of, this further. The Committee would welcome updates from the Scottish Government on further discussions and developments in relation to this issue.

Outward migration of young people
155. The Committee understands that the population of rural areas is increasing faster than urban areas due to positive net in-migration. However, the age distribution of the population in rural areas compared to the rest of Scotland is markedly different for particular groups. Specifically, rural areas have a much lower proportion of the population in the ages 16-34 but a higher proportion of people aged 45 and over.78

156. The SRUC identified the continuing outward-migration of young people as a continuing challenge for rural policy. It made some suggestions as to how this could be addressed in the NPF3. Greater provision of affordable rural housing is one aspect, but it also identified the provision of business units that support apprenticeships, and improving transport links as other key issues. In its written submission79 to the Committee West Dunbartonshire Council noted that the NPF3 said little at all about population change.

157. The Committee asked the Scottish Government if there was anything in the NPF3 that would tackle the issue of outward migration of young people. Derek Mackay summarised his position by saying that the NPF3 is for all the people of Scotland, and, in his view, the NPF3 helps give everyone, including young people, a sustainable future, jobs, housing, employment, access and digital connectivity.

158. The Committee remains concerned that the outward-migration of young people from rural areas is a significant issue and impacts on the sustainability of rural communities. The Committee recommends that the Scottish Government considers the scope for the final NPF3 to address the outward-migration of young people from rural areas.

Connectivity
159. Witnesses were generally supportive of the Scottish Government’s policy to make high-speed broadband available in rural areas. In written evidence80 the SRUC raised the issue of the cost of broadband subscriptions in rural areas, and this was picked up in oral evidence. The use of mobile broadband infrastructure

79 West Dunbartonshire Council. Written submission.
80 Dr Sarah Skerratt, Scottish Rural College. Written submission.
was also discussed. The SRUC noted that cost applies equally to other infrastructure in rural areas, such as transport.

160. During its evidence gathering the Committee heard about the importance of rural services, such as high speed broadband and transport links that are affordable and available. The Committee sought clarity from the Minister on how the NPF3 could help to achieve connectivity in rural areas.

161. Paul Wheelhouse agreed that the cost of living in the Highlands and Islands is high and research by the Joseph Rowntree Foundation showed it was up to 20% higher than it is in urban Scotland. He stated that one of the biggest costs for people are those of transport to places of employment and that the draft NPF3 supports the roll-out of digital infrastructure which could help people avoid the need to travel by enabling them to work from home and by providing support to small businesses to locate in rural areas.

162. The Committee has previously taken evidence on the importance of high speed broadband and the progress of its roll-out to rural parts of Scotland during its budget consideration. The Committee understands that there are gaps or “not spots” in provision and this continues to be a matter of concern for the Committee. The Committee encourages the Scottish Government to continue to prioritise and support the roll out of digital infrastructure to remote and rural areas. The Committee also encourages the Scottish Government to consider whether there is further scope for the NPF3, and the Scottish Government, to support connectivity for individuals and businesses in rural areas, given the significant costs of this, compared to the costs for those in urban parts of Scotland.
ANNEXE A: EXTRACT FROM THE MINUTES OF THE RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE

RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE

MINUTES

2nd Meeting, 2014 (Session 4)
Wednesday 29 January 2014

Draft Third National Planning Framework (NPF3): The Committee took evidence from—

Peter Hutchinson, Planning and Renewables Unit Manager, Scottish Natural Heritage;
Paula Charleson, Head of Environmental Strategy, Scottish Environment Protection Agency;
Alistair Brown, Head of Sustainability, Glasgow City Council;
Bruce Wilson, The Scottish Wildlife Trust and Deputy Convener of the LINK Planning Task Force, and Aedán Smith, Convener of the Planning Task Force, Scottish Environment LINK;
Fergus Murray, Head of Economic Development and Strategic Transportation, Argyll and Bute Council.

RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE

MINUTES

3rd Meeting, 2014 (Session 4)
Wednesday 5 February 2014

Draft Third National Planning Framework (NPF3): The Committee took evidence from—

John Mayhew, Director, Association for the Protection of Rural Scotland;
Dr Sarah Skerratt, Head of Land Economy, Environment and Society Research Group, and Director of Rural Policy Centre, Scotland’s Rural College;
Professor Phil Thomas, Chairman, Scottish Salmon Producers’ Organisation;
Scott Dalgarno, Development Plans Manager, Highland Council;
Carroll Buxton, Director/Regional Development, and Calum Davidson, Director of Energy and Low Carbon, Highlands and Islands Enterprise;
Stuart Goodall, Chief Executive, Confor.
Decision on taking business in private: The Committee agreed to take its consideration of its draft report on the draft National Planning Framework 3 in private at future meetings.

Draft Third National Planning Framework (NPF3): The Committee took evidence from—

Paul Wheelhouse, Minister for Environment and Climate Change, Derek Mackay, Minister for Local Government and Planning, Jim Gilmour, Policy Officer, and Dr Fiona Simpson, Assistant Chief Planner, Scottish Government.

Draft Third National Planning Framework (NPF3) (in private): The Committee considered a draft report and agreed to consider a revised draft at its next meeting.

Draft Third National Planning Framework (NPF3) (in private): The Committee agreed its draft report.
ANNEXE B: ORAL EVIDENCE AND ASSOCIATED WRITTEN EVIDENCE

2nd Meeting (Session 4), Wednesday 29 January 2014

ORAL EVIDENCE

Peter Hutchinson, Planning and Renewables Unit Manager, Scottish Natural Heritage
Paula Charleson, Head of Environmental Strategy, Scottish Environment Protection Agency
Alistair Brown, Head of Sustainability, Glasgow City Council
Bruce Wilson, The Scottish Wildlife Trust and Deputy Convener of the LINK Planning Task Force, Scottish Environment LINK
Aedán Smith, Convener of the Planning Task Force, Scottish Environment LINK
Fergus Murray, Head of Economic Development and Strategic Transportation, Argyll and Bute Council

3rd Meeting (Session 4), Wednesday 5 February 2014

ORAL EVIDENCE

John Mayhew, Director, Association for the Protection of Rural Scotland
Dr Sarah Skerratt, Head of Land Economy, Environment and Society Research Group, and Director of Rural Policy Centre, Scotland’s Rural College
Professor Phil Thomas, Chairman, Scottish Salmon Producers’ Organisation
Scott Dalgarno, Development Plans Manager, Highland Council
Carroll Buxton, Director/Regional Development, and Calum Davidson, Director of Energy and Low Carbon, Highlands and Islands Enterprise
Stuart Goodall, Chief Executive, Confor

4th Meeting (Session 4), Wednesday 19 February 2014

ORAL EVIDENCE

Paul Wheelhouse, Minister for Environment and Climate Change
Derek Mackay, Minister for Local Government and Planning
Jim Gilmour, Policy Officer Scottish Government
Dr Fiona Simpson, Assistant Chief Planner, Scottish Government

SUPPLEMENTARY WRITTEN EVIDENCE

- Minister for Environment and Climate Change (396KB pdf)
ANNEXE C: LIST OF OTHER WRITTEN EVIDENCE

SUBMISSIONS RECEIVED IN RESPONSE TO CALL FOR VIEWS

- Richard Lochhead, Cabinet Secretary for Rural Affairs and the Environment
- David Balharry, Project Leader – ECHR Compliance Order, Scottish Government
- Richard Lochhead, Cabinet Secretary for Rural Affairs and the Environment
- Association for the Protection of Rural Scotland (78KB pdf)
- Badenoch & Strathspey Conservation Group (96KB pdf)
- Peter Baten (86KB pdf)
- Comhairle nan Eilean Siar (186KB pdf)
- CONFOR (78KB pdf)
- COSLA - holding submission (209KB pdf)
- COSLA - final submission (283KB pdf)
- Fife Council (73KB pdf)
- Friends of the Earth Scotland (169KB pdf)
- John Muir Trust (328KB pdf)
- North Ayrshire Council (143KB pdf)
- NAV OV (North Ayrshire Vandalised Our Village) (12KB pdf)
- RenewableUK (188KB pdf)
- RES UK & Ireland Limited (252KB pdf)
- RTPI Scotland (87KB pdf)
- RSPB Scotland (158KB pdf)
- Scottish Association for Public Transport (146KB pdf)
- Scottish Council for Development and Industry (125KB pdf)
- Scottish Environment LINK (159KB pdf)
- SEPA(Scottish Environment Protection Agency) (187KB pdf)
- Scottish Opencast Communities Alliance (SOCA) (94KB pdf)
- SNH (Scottish Natural Heritage) (177KB pdf)
- Scottish Power (235KB pdf)
- Scottish Renewables (172KB pdf)
- Scottish Water (6KB pdf)
- Scottish Wildlife Trust (148KB pdf)
- Scottish Salmon Producers’ Organisation (173KB pdf)
- Dr Sarah Skerratt, SRUC (254KB pdf)
- South Lanarkshire Council (173KB pdf)
- Stop Climate Chaos Scotland (68KB pdf)
- West Dunbartonshire Council (156KB pdf)
- WWF Scotland (98KB pdf)

OTHER WRITTEN EVIDENCE

- John Muir Trust (226KB pdf)
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