



The Scottish Parliament  
Pàrlamaid na h-Alba

## Official Report

# RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE

Wednesday 29 January 2014



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**RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE**  
**2<sup>nd</sup> Meeting 2014, Session 4**

**CONVENER**

\*Rob Gibson (Caithness, Sutherland and Ross) (SNP)

**DEPUTY CONVENER**

\*Graeme Dey (Angus South) (SNP)

**COMMITTEE MEMBERS**

\*Claudia Beamish (South Scotland) (Lab)  
\*Nigel Don (Angus North and Mearns) (SNP)  
\*Alex Fergusson (Galloway and West Dumfries) (Con)  
\*Cara Hilton (Dunfermline) (Lab)  
\*Jim Hume (South Scotland) (LD)  
\*Richard Lyle (Central Scotland) (SNP)  
\*Angus MacDonald (Falkirk East) (SNP)

\*attended

**THE FOLLOWING ALSO PARTICIPATED:**

Alistair Brown (Glasgow City Council)  
Paula Charleson (Scottish Environment Protection Agency)  
Peter Hutchinson (Scottish Natural Heritage)  
Fergus Murray (Argyll and Bute Council)  
Aedán Smith (Scottish Environment LINK)  
Bruce Wilson (Scottish Environment LINK)

**CLERK TO THE COMMITTEE**

Lynn Tullis

**LOCATION**

Committee Room 6



## Scottish Parliament

### Rural Affairs, Climate Change and Environment Committee

*Wednesday 29 January 2014*

[The Convener *opened the meeting at 10:02*]

### Decisions on Taking Business in Private

**The Convener (Rob Gibson):** Welcome to the second meeting in 2014 of the Rural Affairs, Climate Change and Environment Committee. I remind everyone to switch off their mobile phones and mobile devices, as they can interfere with the sound system.

Under agenda item 1, I seek the committee's agreement to take in private item 4, which concerns our draft report on the proposed draft Agricultural Holdings (Scotland) Act 2003 Remedial Order 2014. Do we agree to do so and to deal with the matter in private at future meetings?

**Members** *indicated agreement.*

**The Convener:** Do we also agree to deal in private with our approach to the scrutiny of the common agricultural policy?

**Members** *indicated agreement.*

## Subordinate Legislation

**Environmental Protection (Restriction on Use of Lead Shot) (Scotland) Amendment Regulations 2013 (SSI 2013/349)**

**Scotland Act 1998 (Agency Arrangements) (Specification) Order 2013 (SI 2013/3157)**

**Plant Health (Scotland) Amendment (No 3) Order 2013 (SSI 2013/366)**

**Sea Fish (Prohibited Methods of Fishing) (Firth of Clyde) Order 2014 (SSI 2014/2)**

**Environmental Protection (Duty of Care) (Scotland) Regulations 2014 (SSI 2014/4)**

**Common Agricultural Policy Schemes (Cross-Compliance) (Scotland) Amendment Regulations 2014 (SSI 2014/6)**

**Less Favoured Area Support Scheme (Scotland) Amendment Regulations 2014 (SSI 2014/7)**

**Long Leases (Appeal Period) (Scotland) Order 2014 (SSI 2014/8)**

**Long Leases (Prescribed Form of Notices etc) (Scotland) Regulations 2014 (SSI 2014/9)**

10:03

**The Convener:** The second item today is consideration of nine negative instruments. No motion to annul has been received in relation to any of the instruments.

I refer members to the papers that we have before us. Does anyone have any comments on Scottish statutory instrument 2013/349?

**Graeme Dey (Angus South) (SNP):** I welcome the measures that are being implemented at the Barry Buddon shooting centre in my constituency. I note the concerns that have been expressed by the National Trust for Scotland and look forward to making a site visit in the next couple of weeks to see for myself the measures that have been put in place and how they will operate. I welcome the instrument.

**The Convener:** I have a comment on SSI 2014/2. It says that it applies to British fishing boats but not to any other nation's fishing boats. I cannot remember what the solution to that problem is, although it has come up regularly over

the years. We should write to the cabinet secretary about that to find out what the situation is. The order restricts the catching of certain species during certain months, but it does not cover trawling for prawns and things such as that. It would be useful to know why, because fisheries officers of the Scottish Fisheries Protection Agency or the Royal Navy can stop people in these waters during that time. That is the only point that I would make.

Are there any comments on the other instruments?

**Claudia Beamish (South Scotland) (Lab):** I would like to highlight the importance of SSI 2014/4. It relates to the transfer of waste, and it is important that there is a proper paper and computer trail of that process in view of the risk of environmental crime, which can be serious.

**Jim Hume (South Scotland) (LD):** On SSI 2014/6, I note that there has been no consultation with stakeholders because the instrument concerns a transfer from a statutory management requirement to a good agricultural and environmental condition requirement. I would have thought, however, that there would have been some consultation. It will be interesting to see how the Government communicates the fact that the issue might affect GAEC conditions and, therefore, CAP payments if there is any incident concerning the protection of ground water against pollution.

**The Convener:** We will write to the cabinet secretary about that.

**Jim Hume:** That would be worth while.

**Angus MacDonald (Falkirk East) (SNP):** I welcome SSI 2014/7, which simplifies the procedure for the roll-out of less favoured area support in 2014. I hope that a similar procedure can be implemented in 2015, pending advice from Europe. The SSI will give some comfort to rural farmers and crofters.

**The Convener:** If there are no further comments, do we agree to make no comments—other than those that we have just made—on the regulations?

**Members indicated agreement.**

## National Planning Framework 3

10:08

**The Convener:** Agenda item 3 is an evidence-taking session on the draft third national planning framework, which will take the form of a round-table session.

I inform everyone that they need not press anything to make their microphones work. Just indicate to me if you want to speak, and we will try to let the discussion flow.

I invite everyone around the table to introduce themselves, starting with Cara Hilton.

**Cara Hilton (Dunfermline) (Lab):** I am the MSP for Dunfermline.

**Peter Hutchinson (Scottish Natural Heritage):** I am from Scottish Natural Heritage.

**Claudia Beamish:** I represent South Scotland and I am the shadow minister for environment and climate change.

**Paula Charleson (Scottish Environment Protection Agency):** I am from the Scottish Environment Protection Agency.

**Richard Lyle (Central Scotland) (SNP):** I am an MSP for the Central Scotland region.

**Alistair Brown (Glasgow City Council):** I am head of sustainability at Glasgow City Council.

**Nigel Don (Angus North and Mearns) (SNP):** I am the MSP for Angus North and Mearns.

**Bruce Wilson (Scottish Environment LINK):** I am from the Scottish Wildlife Trust and Scottish Environment LINK.

**Alex Fergusson (Galloway and West Dumfries) (Con):** I am the MSP for Galloway and West Dumfries.

**Aedán Smith (Scottish Environment LINK):** I am head of planning for RSPB Scotland, but today I am representing Scottish Environment LINK.

**Jim Hume:** I am an MSP for South Scotland.

**Angus MacDonald:** I am the MSP for Falkirk East.

**Fergus Murray (Argyll and Bute Council):** I am from Argyll and Bute Council.

**Graeme Dey:** I am the MSP for Angus South.

**The Convener:** I am Rob Gibson, MSP for Caithness, Sutherland and Ross.

I will kick off with the first theme that we want to cover. I invite you to consider the extent to which the goals of securing a low-carbon Scotland are embedded across NPF3.

**Peter Hutchinson:** They are embedded positively. NPF3 is helping to support the goals of a low-carbon economy. The framework covers matters to do with climate change mitigation and preventing impacts, and it deals with climate change adaptation, too. Related to that is the issue of getting the right development in the right place as far as mitigation is concerned. On adaptation, NPF3 covers the importance of green infrastructure in creating a resilient environment.

**The Convener:** You do not all have to answer each question, but you have the chance to do so.

**Paula Charleson:** SEPA recognises that the national planning framework has a fundamental role in delivering against Scotland's greenhouse gas reduction targets. NPF3 translates that rather well, in spatial planning terms, as regards how to mitigate carbon, particularly in the energy sector. That is very strong, but there are areas in which we could possibly do more. We can perhaps explore those later in relation to issues around carbon, waste management, zero waste and patterns of low-carbon development.

**The Convener:** We will try to do so.

**Aedán Smith:** There are a range of different views within Scottish Environment LINK about how effective the national planning framework is on that issue. We all agree, however, that there are some really positive words in NPF3 about how we can deliver some things through adaptation and some things through mitigation. The framework is perhaps a bit lacking when it comes to the more precise actions that could be taken over the next 20 to 30 years, or even a bit sooner. It is always worth bearing in mind the fact that the framework looks forward 20 to 30 years, so it covers really long-term things.

Some Scottish Environment LINK members are concerned that there are contradictions in the framework. That is perhaps inevitable, given the nature of the document. 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.

Some LINK members have picked up on the point that, if we move forward with current technology, in order to reduce our carbon emissions there will have to be some transition away from existing sectors. The framework does not tackle that issue as effectively as it might. For instance, oil and gas and other fossil fuel combustion could be compatible with carbon reduction if carbon capture and storage comes on stream. However, if CCS does not come on

stream we will have to think about how we deal with that.

**The Convener:** In the context of CCS, yes.

**Bruce Wilson:** I will put forward the Scottish Environment LINK view on peatlands. Some members have put it to me that NPF3 is good in that it discusses peatlands, although it specifically mentions their relevance to north and north-west Scotland. There are a lot of peatlands in those areas but there are also a lot in the borders and the central belt where bog restoration is going on, and there are a lot of community benefits to be derived from that. Peatlands have been identified as a huge potential carbon store, and it might be good to get NPF3 thinking about peatland restoration projects outwith the north and north-west.

This is perhaps more of an issue for Scottish planning policy, but it might be worth tackling the extraction of peatlands for horticulture, which is in effect banned in England but is still allowed up here.

10:15

**The Convener:** Perhaps that is because England has very little peat left to extract. That is a fair point. Peat extraction can still be seen to be going on in some areas of my constituency in the north of Scotland.

**Fergus Murray:** From Argyll and Bute Council's perspective, the draft NPF3 is a welcome improvement on the main issues report. Our concern is that the role that the west coast and a collection of authorities there could play in contributing to the generation of offshore renewables, in terms of co-ordinated areas, is still not really recognised in the draft. However, we welcome the recognition of pumped storage in hydro, which is important for Argyll and Bute. I realise that, with the threshold for national developments in hydro being set at 50MW, Cruachan might not necessarily be included.

We also welcome the better recognition of active travel routes. There is concern about how we can maintain the routes that we have and start to maintain the new routes that are coming on stream. We all want those new routes, but there is a lot of concern about how we can properly maintain them for the people who will use them.

There could be a little more recognition of forestry in the draft NPF3. Thirty per cent of Argyll and Bute's landmass is forestry, and forestry could play a more important role throughout Scotland in tackling the carbon issue.

**The Convener:** The issue is the extent to which securing a low-carbon Scotland is embedded in

the report, and the committee must make its own comments on that.

**Alistair Brown:** I will restrict my comments to a general overview of NPF3. I assume that there will be opportunity for more discussion on the development priorities, particularly in relation to how they affect the Glasgow area. There is a fairly strong feeling in the west of Scotland that the draft NPF3 may not have picked up on that.

As a narrative on where Scotland is today and where it will be tomorrow, the draft NPF3 is good. It covers a lot of bases. However, as my colleague Aedán Smith said, there are quite a number of issues on which it is not clear about actions over the next 20 to 30 years. We feel that a number of areas do not seem to have any great prominence in the document. Waste is a big issue for local authorities. We have a new waste treatment plant in Glasgow, and other local authorities will have quite a strong focus on waste management in the coming years.

There is very little in the document about the future cities programme, which is another big issue for Glasgow. As you know, we are the future cities demonstrator city for the United Kingdom and we are working closely with a number of the other Scottish cities to roll out some of the benefits of the future cities programme to other cities in Scotland. There does not seem to be any acknowledgement in NPF3 of what the benefits of that might be in the next 20 to 30 years.

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. Glasgow has recently been accorded the status of being one of the Rockefeller Foundation's network of 100 resilient cities. The foundation created the network recently and, in December last year, Glasgow had the accolade of being invited into the network as one of the first 33 cities.

Resilience and climate resilience in Glasgow will be very much a key focus in the coming years as we work with the Rockefeller Foundation and the other network cities throughout the world. 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, and we hope that Glasgow will be at the forefront of that.

There are two other areas in which the document is lacking, one of which is partnerships. In a city that is the size of Glasgow, partnership arrangements are extremely important. The metropolitan Glasgow strategic drainage

partnership—the MGSDP—which is built on partnerships, is referred to in NPF3 but there are various other good examples of what is happening in Glasgow and other cities. Indeed, the Scottish cities alliance is a partnership arrangement. The benefit of working in partnership does not seem to have been picked up on in the document.

The other issue that does not seem to have been included is urban air quality, which is a big issue in all the cities in Scotland and elsewhere. Air quality will be a big issue in the development of public health issues and the economy in the coming years.

**The Convener:** I lodged a motion in Parliament that praised Copenhagen for taking the crown as this year's European green capital and that asked what thinking would need to be done by the Government, the Convention of Scottish Local Authorities and local authorities for any Scottish city to compete in that competition to be Europe's green capital. How do your remarks about the Rockefeller Foundation's 100 resilient cities relate to European cities such as Freiburg, Nantes and Copenhagen?

**Alistair Brown:** At the moment, the Rockefeller Foundation's network, which is an international network, includes only 33 cities but the intention is to build that number up to 100. Only five of those 33 cities are in Europe: Vejle in Denmark, Glasgow, Bristol, Rotterdam and another—its name has escaped me, but it will come back to me before the end of the morning. Only a select number of cities are in the Rockefeller Foundation's network, and Glasgow is one of that select group of international cities.

As you may know, Glasgow bid for the 2015 title of green capital, the adjudication process for which took place in 2013. We reached the final shortlist, along with Ljubljana, Bristol and Brussels. I was part of the team that made the presentation to the European Commission and we reckon—to an extent, this is anecdotal—that we came second. Bristol got the title for 2015. Glasgow's bid was based heavily on the partnership arrangements that I have spoken about, which were key for the EC, and the issue of what was termed "green growth", which was about how the environment can lead to economic growth and jobs. We made a strong pitch in relation to the opportunities that exist in Glasgow to assist with economic development and green growth.

The feedback that we got from the panel was that Glasgow's bid was strong and that the EC was happy with it but that we had not demonstrated that we had done enough up to that point. In our presentation, we gave a good description of where we were going and what we wanted from Glasgow as a sustainable city, but the EC felt that we needed to provide a bit more



evidence of what we had done. We have aspirations to make another bid for the title, potentially in 2018. If we do that, we will have to build on some of the lessons that we have learned from the process over the past year or two.

**The Convener:** Your evidence is welcome because we were less than happy with the evidence from COSLA, which did not seem to wish to engage fully with the process. It is good to hear some of the detail of that from our leading city. Many of our members have an interest in cities as well as in the countryside, and that information is worth knowing.

Does anyone have any points that they want to raise before we move on to some other themes?

**Alex Fergusson:** I would like to ask Mr Brown, who has mentioned the lack of focus on the importance of partnership, to expand briefly on the sort of partnerships that he is referring to and their importance in the whole process.

**Alistair Brown:** A good example is the sustainable Glasgow programme. Before the most recent election, the administration in Glasgow proposed 100 manifesto commitments, the second-largest grouping of which was to do with sustainability. As you know, politicians make promises during elections and have to try to keep them afterwards. The council leader was quoted after the election as saying that the city council would not be able to deliver the sustainability commitments on its own and that partnership working would be important.

The sustainable Glasgow programme, which has been running for the past three years, has been a key part of where Glasgow is going in relation to sustainability. It creates a network of public and private organisations: we are active in Glasgow with the national health service, representatives of the Scottish Government, the academic sector and a number of private sector organisations as well. The partnership arrangement is very much about us working together. For example, the drainage plan is a partnership arrangement involving SEPA, Glasgow City Council, other local authorities and Scottish Water.

We are doing some work now to develop energy networks in Glasgow. It is very much about us working with the large energy companies and with the NHS and other public sector organisations that may wish to contribute to a district heating network. All social housing in Glasgow is now outside of the council, with the housing associations, so we have to work in partnership with a number of other organisations if we are to deliver some of the things that we want to deliver.

**Alex Fergusson:** That information is useful and illuminating, because it highlights the fact that,

where appropriate, we are talking not just about public sector partnership but about involving the private sector and others in the process.

**Aedán Smith:** It is an interesting discussion. The national planning framework is the spatial expression of Government policy. Some of those issues relate more to governance structures, and perhaps the national planning framework does not make the connections as well as it could. I wonder whether there is more that the national planning framework could do to make the connections between what some bits of Government are doing in terms of governance structures and what we want Scotland's towns and cities to look like.

If we want to make Scotland's cities more like some of the fantastic European cities, the national planning framework is quite good at thinking about what we can do to build new stuff, but it is less good at thinking about how to restructure our existing built development. Some of Scotland's cities are doing good work on that, but the national planning framework does not really highlight how things can change.

One obvious example is the move to more sustainable transport and how we can make our existing built environment fit with cycling and walking. The national planning framework picks up on things such as new national walking and cycling networks. That is great, but it is really more about recreational walking and cycling rather than the kind of walking and cycling that gets people to work or to the shops. The framework could do more on how we can restructure existing infrastructure.

**Graeme Dey:** My question is for Alistair Brown. It sounds as if Glasgow City Council is extremely proactive in pursuing partnerships, which is welcome. I do not wish to put you on the spot, Mr Brown, but is that typical of local authorities around Scotland?

**Alistair Brown:** I shall broaden that issue a wee bit. We have a lot of dialogue with other cities and it is becoming more typical of what cities are doing. I recently had a discussion with colleagues in Copenhagen, which is regularly put up as being in the vanguard of the green agenda, and they were asking us about partnership arrangements and how they could develop them further.

If cities really expect to develop infrastructure and make themselves more resilient and more sustainable, they must consider partnerships. That seems to be an emerging trend in cities, not just in the UK but abroad.

10:30

**Graeme Dey:** In our 32 local authorities in Scotland, which are of different sizes and shapes,

is that happening? Is there movement towards developing partnerships?

**Alistair Brown:** I can speak only about cities. Let me give you the example of the dialogue that we have had in the Scottish cities alliance. There is an emerging debate about how cities can work in co-operation with each other and with other partners. For example, in relation to drainage, Scottish Water works throughout Scotland and in all Scotland's cities. There definitely is a trend towards working more in partnership in cities in Scotland.

**Fergus Murray:** I speak from the perspective of a remote rural council. We work in partnership with the likes of SEPA and Scottish Natural Heritage, but our resources are extremely limited compared with the resources of cities. The approach is quite informal. We concentrate on avoiding risk, so in our plans we try to avoid building in flood areas or other vulnerable areas.

I do not think that councils in the rural areas have the necessary resources to do the proactive work on partnership working that cities do. That is my experience from working in the north Highlands and with colleagues in planning and economic development.

A lot of local communities are showing the way forward on partnership working to meet challenges to do with the carbon agenda, for example, which is interesting. Gigha has four wind turbines and has been innovative about battery use in the context of its most recent turbine. The community is driving that work, and it is supported by the likes of Highlands and Islands Enterprise and Argyll and Bute Council, which increasingly provide professional and in-kind support rather than significant resources.

**Paula Charleson:** A good example of local authority partnership working is TAYplan, up in Tayside, which won an award from the Royal Town Planning Institute for its partnership work on its strategic development plan. Another example is SEPA's work with local authorities in developing the flood hazard maps, which has been fantastic. There are pockets and examples of such work across the country.

**Alistair Brown:** There has been a lot of discussion in the Scottish cities alliance about sustainable transport and alternative fuels. Aberdeen has a focus on hydrogen. There has been quite a lot of discussion between cities and bus operators. There are emerging opportunities in that regard.

I have remembered the fifth European city in the Rockefeller Foundation's network: it is Rome.

**The Convener:** That is useful. Thanks for that.

**Claudia Beamish:** The goal of securing a low-carbon Scotland is embedded in NPF3. We have touched on a number of areas in that regard, and Aedán Smith talked about the existing infrastructure. Like him, I do not see much in NPF3 about how we can shift towards a more low-carbon way of living, for example through active travel and district heating projects. There is not much information about low-carbon heat or about waste, as SEPA said. Can we home in on what action needs to be threaded through the whole document? That is a big question—

**The Convener:** Should we think about that when we come to talk about low-carbon place?

**Claudia Beamish:** We could do that, convener, if that is more appropriate.

**The Convener:** Yes, we could park that issue, and you can rejig the question by leading off on low-carbon place in a minute or two.

We need to think about how well NPF3 supports the delivery of the second draft report on proposals and policies. RPP2, which is this committee's particular concern, generally looks at policies to deliver the low-carbon economy that we have just been talking about, and discussion of it might set up a discussion about low-carbon place, which is what Claudia Beamish would like to talk about.

**Bruce Wilson:** I will quickly address the peatlands issue. I know that I have said it before, but—

**The Convener:** We are going to deal with peatlands slightly later. You can come in on that point then, if that is okay.

**Bruce Wilson:** That is fine. I will come in then.

**The Convener:** We have identified peatlands as a theme that we would like to deal with.

The next question is: how does NPF3 support RPP2?

**Aedán Smith:** That is a challenging question for Scottish Environment LINK to answer. We had a discussion about it the other day. Our views on climate change are sometimes a little light because most of our members who have an active involvement in climate change issues tend to work through Stop Climate Chaos or through their individual organisations. Our focus has tended to be on issues of adaptation and mitigation, and I am afraid that we have not looked in detail at the match-up with RPP2. There are a few things that we can touch on, but LINK does not have any very detailed comment to make.

**The Convener:** Stop Climate Chaos seemed relatively happy with the way in which NPF3 is laid out in that respect. Does LINK agree?

**Aedán Smith:** Broadly, although with my earlier disclaimer. The other issue is timescales, as they do not seem to quite match up. NPF3 is a really useful document in that it looks far ahead to a 20 or 30-year time horizon, whereas some of the measures that are being implemented through RPP2 do not look as far ahead as that. The two could match up a bit better—and if they both followed the NPF3 time horizon, that would be useful.

**Peter Hutchinson:** It is important to highlight that NPF3 sees the natural heritage as an asset, so we are not trying to make our challenges any worse. We should encourage people to see the natural environment as an asset rather than a constraint.

In terms of specific actions, NPF3 contains a national development to do with a national cycling network. That is about encouraging active travel where people work, live and visit. There are practical actions in NPF3 in terms of national developments as well as other developments to support a low-carbon economy.

**Paula Charleson:** There is so much to say, but I will pick one thing that fits with your agenda.

NPF3 focuses quite a lot—and very well—on energy supply considerations generally, but more could be done on actions to promote sustainable patterns of new and existing development.

One way of doing that would be to encourage more use of carbon assessment tools by developers in thinking about the carbon impacts of their developments. 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. That was an interesting way of using the SPACE tool. It tends to be used for big developments, so it can be applied to 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.

**Nigel Don:** I want to return to Peter Hutchinson's reference to the national cycle network. There appears to be more emphasis in the NPF on cycling for leisure than for getting to work. That might be the right way round, but perhaps we should do more to ensure that we can get to work by cycling.

In my rural constituency there are places only 10 miles apart that people ought to be able

to cycle between to get to work, but by and large they cannot do so without taking their lives into their hands on relatively busy but minor roads. Ignoring that as a detail, do the witnesses feel that NPF3 says enough about cycling or active travel in rural areas?

**The Convener:** Is there a simple answer to that? Or is the answer more complex? Aedán Smith and Fergus Murray will address that.

**Aedán Smith:** My answer to Nigel Don's question is no, because the NPF could certainly do more. It is interesting, though, that we are straying to an extent into what Scottish planning policy covers rather than the NPF. The NPF is about the spatial vision and the SPP is about criteria-based policy, but it is really hard to tease the two apart.

It is therefore useful that the Government is consulting on both at the same time. There is a statutory requirement for parliamentary scrutiny of the NPF, but there is not for the SPP. That is perhaps a weakness, so it is good that we can touch on issues from both during this period.

Paula Charleson made a point about the carbon assessment of development. One suggestion that some LINK members raised in—I think—the submission from Stop Climate Chaos on the report on proposals and policies is that the SPP, in the criteria-based policies that it requires, could usefully require that when local authorities are considering major developments there should be a specific requirement to consider their carbon impact and how they will help us to meet our carbon-reduction targets. It was also suggested that, when local authorities are preparing their development plans, there could be a specific requirement for them to consider specifically how the plans will help us meet our carbon-reduction targets.

Both those approaches could really help to focus the minds of all of us—local authorities and all the partners working on development plans—on how we will reach the targets. That probably fits better with the SPP rather than the NPF, albeit that it is hard to tease the two apart.

**Fergus Murray:** From Argyll and Bute's perspective, we welcome any investment by Sustrans in active travel routes, and we work closely in partnership with Sustrans to achieve that.

The active travel aspirations are great and we are totally signed up to them. In our rural areas, we try to prioritise multifunctional routes that will serve more than just recreational purposes and that will come into towns. For example, there is a new cycle route from Dumbarton to Helensburgh. We want to have safe routes right into towns that

will both help people who commute and join up to, for example, the John Muir way walking route.

We have a problem about action to maintain such routes. For example, our core path plan in Argyll and Bute has well over 1,000 miles of active travel routes, but the maintenance budget is only £7,000. We welcome investment in active travel routes and will always say yes to it, but we are always struggling to maintain the routes. When we ask "Can we have something to maintain it to the standard that we need?", the answer is always "No. You need a new project."

If we are going to have targets, we need to think about the holistic picture and ensure that, when people use the routes, they do not have to phone me up and complain about how bad they are. That happens quite often.

**The Convener:** Understood.

**Alistair Brown:** There is quite a strong feeling in the west of Scotland that NPF3 has failed to pick up on the need to use vacant and derelict land that is former industrial land. I think that 43 per cent of that land lies within the Glasgow and Clyde valley area. We feel that there must be greater focus on that land in the setting of development priorities in the future.

The use of industrial land is certainly covered in the discussion about Ravenscraig, but the strategic development plan for the Clyde valley area concerns the corridor running from Inverclyde all the way down through Glasgow city centre and into Lanarkshire. Therefore, we seem to be missing a primary focus for Scotland's regeneration. There is a strong feeling in the west of Scotland that that should be given greater prominence in NPF3.

10:45

**Bruce Wilson:** My comment comes back to Nigel Don's point. At the Scottish Environment LINK planning meeting that we had on Friday, one of our members pointed out that paragraph 5.23 of NPF3 specifically says that rural areas should be more accessible and that reliance on the car will remain important in rural Scotland. There is no mention of active travel in that paragraph. That was highlighted as being problematic especially because, as Nigel Don says, there are plenty of towns in rural Scotland that are 10 miles or less apart and could easily be cyclable. I was asked to bring that up.

**The Convener:** We will bear that in mind.

**Peter Hutchinson:** I will come back to the original question about whether the national cycle network would provide access in rural areas, particularly for local people.

The national development is designed to provide key strategic connections, so it will not be

able to provide access for everywhere. However, as has been mentioned in the discussion, it is not only through the national development that active travel will be provided for, and we must think about core path plans.

The challenge is what goes in the national planning framework and what is progressed in local development plans and by other initiatives. A comment was made about funding. That is where the national planning framework must connect with other initiatives. I agree that it is a challenge, but the national planning framework will probably not provide all the solutions to it.

I will pick up on the question about the focus on derelict land. The central Scotland green network proposed national development provides a focus in the draft NPF on reusing existing land. It also encourages a focus on active travel. That might not help for some rural areas, but it provides a steer for that national development.

**Richard Lyle:** I echo the comments that Alistair Brown made, particularly those on Ravenscraig, and I compliment the Scottish Government on finally making Ravenscraig a national priority. The previous Scottish Executive never did that during the years that it was in power. It was continually thrown at me as the Scottish National Party group leader on North Lanarkshire Council.

I suggest that, in the national planning framework document, Glasgow and the Clyde valley should have separate pages, as should Edinburgh and the south-east, because they are diverse areas. On its own, Glasgow has made many improvements, but South and North Lanarkshire have a lot of derelict areas and we want to improve them.

I have always said that we have too many planning restrictions that make people not want to invest. We do not encourage investors to come in. It all boils down to what is good for the area and the local community.

I could go on and on, but I see that you are getting a bit impatient with me, convener, so I will close.

**The Convener:** No, it is useful to have those comments.

Claudia Beamish will kick off on the next section, which is, appropriately, about low-carbon place.

**Claudia Beamish:** There is quite a robust chapter in the draft national planning framework 3 that is headed "Ambition Opportunity Place". Obviously, place is fundamental, as we all live and work, and sometimes try to relax, in places.

On actions, I have highlighted the current built infrastructure. We always seem to be grappling with how we can adapt our cities, villages and

rural areas so that we can effect change. To state the obvious, it is, of course, much harder to adapt old buildings for district heating or to have segregated cycle lanes on roads that already exist, as they were not built for them. Does anybody have any comments on that?

**Aedán Smith:** That is a really good point, and it is perhaps still a bit of a weakness of the document. The national planning framework is evolving. The current framework is the third and only the second that has been statutory. It came from a planning background, so it focuses on things that the planning system, as opposed to building control or roads authorities, for instance, has an influence over.

The national planning framework would be more useful if it looked more holistically at the different sectors that influence the places that we live in. It does that with some issues, but it really only touches on it. The document would be more useful if it was a more comprehensive or complete visualisation of the Scotland that we want and if it looked at the other sectors as well as the things that the planning system can influence.

In the minister's foreword to the document, he says that it is "the spatial expression" of the Government's economic strategy. It kind of is. It starts to head down that route in some areas, but it perhaps does not touch on that quite as much as it could where things are not directly influenced by the planning system, such as some of the things that Claudia Beamish mentioned, which are perhaps more influenced by building control or roads authorities in their planning mechanisms. The document could be the place in which we bring those things together and have a more holistic look at the Scotland that we want to see in a few years.

**The Convener:** Are there any other comments on the Scotland that we want to see?

**Alex Fergusson:** I refer to Mr Smith's comments. Aquaculture and wind farms are two areas in which the Scottish Government and others are keen to develop. As all of us who get representations on those issues are all too aware, both areas carry with them a certain amount of controversy. I noticed that, in its submission, Scottish Environment LINK is strong on and critical of the lack of focus in NPF3 on both those areas of development. Will you expand on your concerns about that and perhaps say where NPF3 is lacking in that regard?

**Aedán Smith:** On the wind farm issue, I will touch on stuff that comes out in the SPP rather than the national planning framework. The SPP recognises the value of wild land, which is potentially a bit controversial in itself. There is a range of views in Scottish Environment LINK

about the role that wild land should have, but the SPP is positive in recognising that there is a national interest in identifying that some areas are more sensitive than others to that type of development. The national planning framework could more usefully tease out that type of thing more frequently.

Mr Fergusson also mentioned the aquaculture sector, and various other sectors could also fall into that bracket. If we recognise as a nation that a sector is nationally important and that we want to support or control it in a certain way, the national planning framework has a role in identifying which areas are more likely to be suitable for that type of development and which are less likely to be. That is not to say, for instance, that areas of wild land definitely should not have wind farms on them; it is simply saying that those areas might be more sensitive to such development, and we might want to be more careful in some instances. That provides a national spatial steer.

Onshore wind is a particularly interesting example, because in planning policy until now, in effect, pressure has been put on local authorities to identify which areas are more or less sensitive. It is good to give local authorities the responsibility to manage their areas but, if something is a national priority, it should be debated a bit more at the national level. Therefore, we might want to think about where things go in a national context, too.

**The Convener:** We will certainly develop some of those points, I suspect.

**Fergus Murray:** From Argyll and Bute Council's perspective, aquaculture and onshore wind energy are the most hotly debated topics in our community. They are very important for the economy of our community. The difficulty for NPF3 in addressing those industries is that they are evolving very quickly. In Argyll and Bute, 485 people are employed in aquaculture, largely in our remote communities, so the sector sustains those communities. Quite often, however, aquaculture projects are very controversial. One project in Loch Etive generated thousands and thousands of objections as well as letters of support.

I do not know whether NPF3 can anticipate the trends, because aquaculture is now moving onshore and to sealed operations, and the industry is becoming larger scale than ever before. Also, it is moving offshore and targeting communities. For example, the industry held a referendum on Colonsay to find out whether the community would support it. The plus side was that the industry would create 12 jobs as well as housing for the workers. The result of the referendum was that Colonsay accepted the industry. However, in another referendum on Coll, the idea was rejected and the company walked

away. The industry is changing rapidly, so we cannot anticipate what might happen.

We have accommodated 14 commercial-sized wind farms in Argyll and Bute. I think that we have done that quite well, in the sense that we have worked with SNH and other partners to try to ensure that the wind farms fit the landscape. As members know, we have a high-quality landscape in Argyll and Bute. However, we are starting to get to a bit of a tipping point for some people. Perhaps regional targets in the NPF3 could be considered. Some people are turning against an industry that has many good carbon benefits, but if they had an idea of where we would stop, they might be more accepting of it. That is just an observation—I know that it is a difficult issue to deal with.

**Graeme Dey:** Following on from that point, I am interested in how you would define “regional”. Also, would you want local authorities to work closely together? There can be issues when a proposed wind farm is on the border between two local authorities—there might be substantial numbers of wind farms on one side while, on the other side, there might be great resistance to just one wind farm appearing because it will impact on the area that sits on the border between the two authorities. How would you tackle such issues? Would you want local authorities to come together in obvious groupings to consider the regional targets?

**Fergus Murray:** I think that that is what we would want. However, with Argyll and Bute, it is always difficult to decide how to group us with other authorities. We engage with both sides—with the central belt authorities and with Highland. However, there are natural clusters, and authorities could work together and talk about a regional target.

**Paula Charleson:** In the context of what we are discussing, wind farms are linked to the development of a low-carbon Scotland. Obviously, onshore wind farms contribute significantly to the Government’s targets on renewables, in particular to the target of 100 per cent of domestic electricity being generated from renewables by 2020. They are also an important development economically.

At the moment, SEPA validates carbon assessments for section 36 consents for major wind farms of 50MW and above. We have done a bit of an assessment and found a significant opportunity to reduce emissions by sensitive siting of such wind farms, taking into account the guidance that is out there and, in particular, thinking about peatlands. We do not want to disturb peatlands and produce carbon emissions while we are busy putting in a renewable energy source. We argue that the requirement for carbon assessments could be strengthened. Perhaps that will be picked up again in the SPP.

The committee might be interested in an example involving Natural Resources Wales, which uses a similar carbon assessment technique to the one that we use for carbon validation. It has made a commitment in guidance that, when a wind farm is developed, if there is a loss of carbon from peatland, there shall be like-for-like replacement. Peat restoration is required, either on the site or near the site, or even through offsetting elsewhere. That reduces the payback period.

11:00

**The Convener:** We will come on to peatlands later.

**Paula Charleson:** Sorry—we were discussing wind farms.

**The Convener:** No, no—the subjects overlap. Before we come on to peatlands, and while we are talking about low-carbon places, I should mention that it was re-emphasised to me last night by an officer active in the Scottish Agricultural Organisation Society, which promotes co-operatives, that it is absolutely essential to ensure community development by having a steady income. The main steady income that people can have in communities such as Gigha comes from their own wind energy. Why would we want to deny people the potential to have that, when it could be the only steady source of income?

We might find that solar power becomes a greater priority in some parts of the country. Income could come from hydro and other sources, not just wind. If we are discussing low-carbon places or businesses, such as farms, should we be denying people the right to make cheaper electricity in order to be a low-carbon contributor in the country? I invite comments.

**Alex Fergusson:** With respect, convener, I am not sure that anybody is seeking to deny that.

**The Convener:** I think that some people are.

**Alex Fergusson:** Some people might do that, but I do not think that anybody round this table is suggesting that, nor do I think that anybody round this table would agree that we can continue with such developments in a completely unplanned way. There has to be some restriction on development—anybody would agree with that.

Surely it is important that NPF3 considers those issues, especially when the evidence suggests that it is not doing so in the most effective way. For instance, I absolutely agree that there has been a welcome increase in local authorities producing their own guidance on wind farm development. Among other things, what gets communities’ backs up is when a plan is rejected on the basis of local authority guidance and then the developers

appeal to the Scottish Government and the decision is overturned, although that does not by any means always happen. There are issues that are worthy of discussion round this table, but I do not think that anybody is seeking to deny the development of renewable energy, particularly when it relates to the on-going economic development of local communities.

**The Convener:** I am talking about low-carbon places, which we are discussing at the moment. In Claudia Beamish's estimation, we need to find ways to make places more resilient. We wonder whether some local communities—I say that in inverted commas—that take strong views about such things would have a different view if they actually controlled the resource themselves.

**Peter Hutchinson:** I was going to come back on the earlier questions about supporting the examination of a more strategic approach to wind farm development. We all agree that we want wind farm development to support the transition to a low-carbon economy.

**The Convener:** And to maintain it, presumably.

**Peter Hutchinson:** We want to maintain it, and we want to have the development in the right places. One challenge is that there are sensitivities, which takes us back to peat. We want to avoid sensitive areas and provide a steer towards other areas that are more robust or resilient. One aspiration of the NPF must be to provide certainty for developers. We do not want to get involved later in the planning system, defending the natural heritage or defending interests; we want to plan for development, and the NPF offers us a chance to get ahead and provide that steer on the right locations for certain developments.

**Fergus Murray:** Planning authorities find it difficult to distinguish between community and commercial projects. When looking at projects, we use the same criteria, which are developed through the SPP. We go down that line to be fair to everyone.

Community projects are usually smaller scale. We work closely with communities. We might tell them that some areas are sensitive—perhaps because of birds, for example—and are not suitable for onshore wind, but we will tell them that there are many other projects to consider. For example, we push hard for mini hydro schemes in communities and we might mention solar energy. Another example is biomass, which is a big thing in Argyll and Bute. We are also working with communities to consider tidal and wave devices. As that technology becomes available, there is a great future for communities. We have 25 islands, all of which are looking at the gamut of renewable

energy projects, so renewable energy will be a big feature in the years ahead.

**Graeme Dey:** I do not want to stray off the subject, but there is an issue with small-scale wind developments. Quite often, and for no real rhyme or reason, individual turbine applications that are made by agricultural businesses are turned down when, perhaps a few miles away in similar settings, other ones are granted. Surely we must be mindful of the pressures that we place on agriculture. The Government and the Parliament are asking agricultural businesses to reduce their carbon footprint. Those businesses also face pressures to become greener from the supermarket contracts to which they are signed up, and they want to reduce their costs. However, there is a shortfall or a deficit in how we deal with the issue.

**The Convener:** That is a matter to which we will return in the next section, too. Paula Charleson has a comment.

**Paula Charleson:** I hope that it is relevant at this point. To return to what Claudia Beamish mentioned about creating a low-carbon place, we have talked about wind farms as community opportunities. Another big opportunity presented in the NPF relates to the role in delivering heat networks, which would be informed by the national heat map that is under development. It is difficult to retrofit district heating schemes, but communities have an opportunity to invest in such schemes. Perhaps NPF3 needs to push more on the issue of designing sustainable places, to ensure that we think about how we might use district heating. We might come on to discuss waste. NPF3 is an opportunity to focus on the use of waste heat from energy plants such as biomass plants.

**The Convener:** Our aim with your evidence is to inform us for the next panel and for our report, so such matters are taken on board; it is not a matter of arguing topics to a standstill.

We seem to have naturally got on to peatlands, so we will move on to that topic

**Graeme Dey:** Paula Charleson has touched on that issue. From the evidence that we have, SEPA is seeking a specific requirement in NPF3 for onshore wind and spatial guidance on the importance of avoiding deep peat areas, as development on such areas can have negative consequences. How prevalent is that problem? Also, is offsetting taking place? To what extent are the associated environmental assessments for proposed developments increasing our knowledge of the condition and type of peat that we have?

**Paula Charleson:** I am happy to add a bit to what I said earlier. The issue will be a growing one, because the more that land is sought for wind

farms, the more they will encroach into deeper peat areas. So that has the potential to be a bigger problem, particularly given the significant area that peatlands cover. Indeed, peatlands cover about a quarter of Scotland, which is far more than in the south, and hold 50 per cent of the total amount of carbon that is sequestered in soils.

You asked whether offsetting is done. At the moment, offsetting is not required for planning consent for a wind farm in Scotland. However, the developer is required to follow the guidelines on the siting of wind farms, which we developed with SNH and the Scottish Government, to minimise the impact on peatlands and to minimise carbon emissions. There is encouragement for some restoration at the end of the 25-year period of the wind farm licence, but there is no requirement for offsetting. There are voluntary codes, such as the peatland code, that some developers and private organisations sign up to whereby they can choose to contribute in order to offset some of their carbon emissions. More of that could be encouraged.

You also asked whether the environmental impact assessment makes a difference. At the moment, a carbon calculator, as it is known, is used only for wind farms that are subject to an energy consents unit consent, which is required for wind farms of 50MW and above. I do not have the figures to hand, but significantly more wind farms are being developed that will have an output below that level, so they will not be subject to the carbon calculator approach, although I think that they will have to take account of the carbon impacts in their environmental impact assessments.

Are environmental impact assessments making a difference? From our analysis of what we have done, we can see a significant difference not just in the requirement for developers to undertake an assessment but in the use of the guidance, which encourages better and more sensitive development. 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? Yes, they receive renewables obligation certificates, but there are other things that receive those and we do not subject them to similar scrutiny.

**The Convener:** Agreed. We will continue this conversation, first with Aedán Smith.

**Aedán Smith:** I will go through the issues in a similar order. Wind farm and peatland interaction is becoming a bigger issue and it makes sense for us to try—in the first instance, if we can—to avoid siting developments of any type on valuable peatlands. The NPF and the SPP could perhaps be more useful in providing more of a spatial guide. The main issues report that was published

by the Government last summer contained a map of peatlands, but that has unfortunately not made it through to the draft NPF.

The other spatial tool that exists at a national level is the national spatial guidance that SNH has produced, which identifies more sensitive areas of peatland. SNH has also produced strategic locational guidance for onshore wind farms that includes a range of constraints. All that it seeks to do is show which areas are more likely to be sensitive and which are less likely to be sensitive. It simply acts as a flag to show that that needs to be considered. It is not about preventing development in any locations; it just says, “If you build here, this is one of the issues that you might need to consider. It’s less likely that you’ll need to consider it over there.”

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 peatland if they are in the wrong place, whether they are housing developments, supermarkets or—a sector that I have been working on quite a lot over the past six months or so—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 wind farm, and that must be borne in mind.

On the issue of offsetting or compensating for losses, if they are going into any area that has peatland of any biodiversity or carbon value in it, most responsible onshore wind farm developers will carry out management works to ensure that that peatland is enhanced and that its value is improved. My organisation, RSPB Scotland, does a lot of work with individual onshore wind farm developers to deliver some positives in that regard and there are a lot of success stories around Scotland.

That leads on to the final question whether our understanding is improving. I think that our understanding of the impacts that wind farms and other developments have on peatlands is improving rapidly, as is our understanding of the types of things that we need to do to restore them.

**The Convener:** Before I bring in Peter Hutchinson, I observe that peat varies in depth. It is important that we recognise that when we talk about peatlands. We should also reflect on the fact that it is unlikely that major developments for renewable energy will take place on deep peat. Some developments might be proposed on shallower peat, and there is the offsetting work that Aedán Smith has just talked about. Please remember that the depth varies considerably wherever such proposals are brought in. That observation is based on what I have noticed on



the ground, and I have quite a lot of ground that is affected.

11:15

**Peter Hutchinson:** Scottish Natural Heritage is leading on the restoration project and we are developing various initiatives to try to restore peat, which reflects its importance. I emphasise that we are working on that project, but we are also learning from experience. The point that the quality of peat varies is important, and we have to reflect that. When we are carrying out restoration, we do not want to make the problem harder than it is at present. I therefore support the comments that have been made about trying to avoid areas that are important for carbon capture. In a way, the national planning framework is trying to achieve a balance between restoring things and promoting development. That is one of the challenges. At a later date, the committee might want to ask us whether that balance has been achieved.

Aedán Smith mentioned our strategic locational guidance, which is trying to help development by identifying sensitivities, whether they relate to peat or something else. That is not about saying no to development; it is about identifying sensitivities that should be considered in relation to development. It involves sensitivities mapping rather than constraints mapping.

**Bruce Wilson:** Aedán Smith has covered quite a lot of what I was going to say, but I will add a quick comment on the point about the mitigation hierarchy. Peatlands are slightly different from other habitats in that they cannot just be replaced per se. We cannot just replace the footprint of a wind farm with deep peat, as it takes thousands of years to form. So, particularly with deep peat, we would want to ensure, first, that we avoid the site if possible and, secondly, that we look at siting the wind farm on the least deep peat. As Paula Charleson mentioned, increasingly, the newer applications that are being made seem to be for areas of deeper peat. I suppose that that is because all the low-hanging fruit has more or less gone.

**The Convener:** That is interesting, but it would be useful to know whether what you are saying is true. If applications are being made for deep peat sites, I would be interested to know where they are. I do not know whether what you are implying is borne out in reality. We have to differentiate between the depths of peat and what deep peat is.

**Paula Charleson:** As you say, convener, the depths of peat vary, and that can be the case within one site. Actually, developers carry out fairly extensive assessments of peat depths and can carry out micro-siting of wind turbines, which makes a huge difference. There are responsible

behaviours, and the developers recognise that difference.

**The Convener:** That is useful—thanks for that short point.

**Aedán Smith:** My point is similar to Paula Charleson's. Peat depths vary across individual sites. However, some individual sites certainly have peat that is quite deep and that is being affected. There are different definitions of what constitutes deep peat. From memory, the Forestry Commission's definition is that peat that is more than 0.5m deep constitutes deep peat for planting purposes. Certainly, development is happening on sites where peatland is deeper than that. Other activities are happening on those areas, so I would not particularly single out onshore wind developments as affecting those sites. We have recently had some concerning opencast coal mine proposals, which have been for sites that have peat that we consider to be quite deep. Different sectors and technologies are having an effect.

I will quickly back up Bruce Wilson's point on peatlands. We have to bear it in mind that, when it comes to offsetting, it is not quick to recreate peatlands, because they take a few thousand years to form.

**The Convener:** Fergus Murray can make a last point on the issue, before we move to our final theme.

**Fergus Murray:** I support your view, convener, on the need for more information about how such activity is affecting peat. My experience of working with wind farms is that developers do everything to avoid peat because of the cost; at all stages, we try to micromanage to avoid peat. It should also be noted that the use of peat is vital for the Islay whisky industry, and they always remind us of that when we take through our local development plans. It is worth bearing it in mind that it is not just wind farms that affect peat.

**The Convener:** I am concerned about people who say that they like whisky but not Islay whisky, if that is the reason. They are wrong.

Our final theme is how NPF3 supports Scotland in adapting to the impacts of climate change. Jim Hume wants to say something about that.

**Jim Hume:** I would like to explore that theme, because many of the respondents mentioned flooding, flood management and the need for catchment-scale flood risk management in response to changing weather patterns. River catchments are not necessarily all within one local authority area and Alistair Brown has already said that Glasgow City Council has been working with North Lanarkshire Council and South Lanarkshire Council. We know that quarries such as those proposed in Overburns and New Lanark in the

past could have affected areas downstream right into Port Glasgow. I wonder whether our guests today have any idea of where we are with catchment-scale flood risk management. Is there any good practice, or are local authorities just working in silos?

**Bruce Wilson:** The Borders land use strategy is the one that is talked about most at the moment and the work that the Tweed forum does is a good example of that, so I would point the committee towards that.

Do you mind if I move on to a further point?

**The Convener:** We can open it out. This is our final main theme.

**Bruce Wilson:** I would like to talk about the central Scotland green network—the CSGN—and about the fact that the national ecological network has not been included as a national development. We at LINK support the active travel parts of the CSGN, 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. That is something that we feel is missing from the central Scotland green network.

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. It is not just central belt towns that suffer from flooding. As we know, the Borders and Aberdeenshire have had some quite severe problems recently. We need green infrastructure in the upper catchments and a national ecological network could help to deliver that.

We have heard about money and compensation from wind farms for local communities, but we do not always know where to spend that most appropriately. Budgets for the Scotland rural development programme are also constrained. We think that a national ecological network could help to focus that money and deliver more bang for our buck. It would be good to include that in NPF3 so that it has a strategic oversight.

**The Convener:** Are you saying that that would be in the context of a more complete view of the Scotland that we want to see?

**Bruce Wilson:** Yes.

**Fergus Murray:** Argyll and Bute Council works closely with SEPA to identify our flood risk. We do not have much interaction with other local authorities on flooding, perhaps because of our geography, but maybe there should be more interaction. We obviously converse with our colleagues in the flood sector at a professional

level, but it does not transpose itself to core strategies.

Our issue in Argyll and Bute is largely coastal flooding, as 80 per cent of our people live on the coast in increasingly vulnerable communities that are subject to regular flooding. We are concerned about the practicalities. The funding from the Government is limited, with any project coming under the £2 million threshold or cap less likely to receive assistance. That is relevant in Argyll and Bute, as most of our schemes are probably less than that and we are concerned whether we will be able to address on-going flooding issues in the years ahead. However, there is scope to work together further on the issue.

**Paula Charleson:** I want to address both the issue of flooding and Bruce Wilson's point about the national ecological network.

With regard to flooding, although SEPA supports the recognition in NPF3 of the importance of catchment scale in flood risk management areas, I should point out that flooding affects both rural and urban areas. As a result, 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. Such an idea might be expressed strongly enough in the NPF, but it needs to be complemented in the SPP. SEPA is also working with partners including the Scottish Government, the Royal Town Planning Institute and Heads of Planning Scotland to further develop flood risk management guidance in the SPP and ensure that the flood risk management strategies that are being developed contain the right mitigations. Now that we have the flood risk hazard maps, we are developing the strategies and, thereafter, the local authority plans.

As for the national ecological network, 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. However, there will need to be concerted action if we are to get such a network to the position at which it could be a national development. I also note the drive in the 2020 biodiversity challenge to encourage such developments and get us to a place where a national ecological framework might be

established. Having those strengths would be useful.

**The Convener:** I wonder whether Alistair Brown can provide a city perspective.

**Alistair Brown:** Something that is not mentioned at all in NPF3 is the climate-ready Clyde project that Glasgow has been working on with Adaptation Scotland. The committee will have to forgive me, because I will focus on Glasgow and the central belt, but the fact is that regionalisation will be really important as far as these issues are concerned. Given that climate change does not end at the Glasgow city boundary, we have to work on a regional basis with other local authorities and partners. I suggest that the example of the climate-ready Clyde project is also relevant to our discussions about drainage.

I do not think that that regionalisation comes out in NPF3. After all, some of its development priorities are geographically localised and it talks about individual parts of Scotland without picking up on the need for the kind of partnership working that we have already discussed and the regionalisation that would bring many benefits, particularly in some city areas.

Another issue in NPF3 that we have not really picked up on is resilience planning. Resilience will be important in some of the larger towns and cities, because we will need to be able to adapt our infrastructure and systems to deal with major climatic events. Of course, that is about not just drainage but transport and communications networks, the various sustainable building opportunities that might exist in housing developments and so on.

11:30

Members will have to forgive me again, but I will make a final point on behalf of Glasgow and the west of Scotland. Our strong feeling is that the development opportunities and national development priorities set in NPF3 will have a weighting as far as future developments are concerned. Going back to my point about regionalisation, we simply do not think that those priorities give enough emphasis to metropolitan Glasgow area's importance to the Scottish economy and Scotland's regeneration and development over the next 20 to 30 years and ask that that issue be addressed.

**The Convener:** Thank you for that.

**Peter Hutchinson:** 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. However, I acknowledge Fergus Murray's comment that we need practical guidance out there. I suggest that that is where the NPF can provide a vision or give a steer but, that said, I have noted the comment that organisations such as SNH must provide guidance on the practicalities.

Finally, although SNH has certainly listened to the various comments about the establishment of a national ecological network, it is trying to take forward the principles of such a network through the development of a green infrastructure, which is something that is emphasised quite a lot in NPF3.

**Aedán Smith:** I will make a couple of quick points. First, the points made in this discussion re-emphasise my previous comment that the national planning framework focuses largely on planning and the built environment. There are links to other land uses, particularly rural land uses, that influence and impact on our built environment and, sometimes, our urban areas but I am not sure that that has been brought out in the NPF as much as it could have been. One exception to that might be the central Scotland green network, but even that focuses on the things that explicitly require planning permission. That is a bit of a weakness in the network's description, which I think could be broadened to make it clear that it includes other things.

My final observation is that we have touched on a broad range of issues, even though the committee has been keen to focus on particular areas. Scottish Environment LINK certainly found it hard to get information together and analyse the document in the very short time that was available; indeed, it has become apparent that 60 days' parliamentary scrutiny gives us only a very short time to get an analysis together and submit it to the committees that are looking at the issue. 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.

**The Convener:** We have had several bites at this particular cherry. I guess that we were not breaking any new ground this morning; instead, we were homing in on particular issues. Nevertheless, your remarks will be taken on board and I thank everyone for their evidence. On 5 February, we will have another evidence-taking session with stakeholders on NPF3 and develop the issues that have been highlighted.

That ends the public part of the meeting. I ask for the gallery to be cleared so that we can move into private session.

11:33

*Meeting continued in private until 12:29.*



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