

SUBMISSION FROM THE JOHN MUIR TRUST

BACKGROUND

The John Muir Trust is the leading wild land conservation charity in Scotland and the United Kingdom. Working with people and communities to conserve, campaign and inspire, the Trust is a membership organisation which seeks to ensure that wild land is protected and enhanced and that wild places are valued by and for everyone. Scotland's wild land is an asset of national and international significance but it is a finite and rapidly disappearing resource. The Trust has experience of the planning process at both the strategic level and through involvement with individual applications.

Main Points:

- **Wild Land and SNH's Core Area of Wild Land (CAWL) map should be referenced in NPF3 as well as in Scottish Planning Policy (SPP) as it is a spatial issue. It is essential that the wording from the NPF3 Main Issues Report (MIR) is restored to the current document :**

"2.18In addition to our nationally important, most scenic, landscapes, we also want to continue our strong protection for our wildest landscapes".

- The Scottish economy benefits significantly from tourism and we should not endanger any aspect of its continued success by degrading our wild land areas with industrial scale developments.
- The boundary between windfarms and settlements should include guidance on proximity to individual houses
- Pump storage hydro electricity was not in the NPF3 MIR and therefore was not consulted on fully and as it stands is not defined spatially
- Onshore and offshore Grid proposals have not been costed financially, assessed appropriately for environmental impact or included in the SPP as part of a national strategic energy policy
- *"Identification of a project as a National Development in NPF3 will establish the need for such a project"* – *NPF3 Participation Statement page 2*. This principle needs re-visited as soon as possible in the light of fast changing technology.

The government clearly states that *"the **National Planning Framework (NPF)** is a long-term strategy for Scotland. It is the spatial expression of the Government*

Economic Strategy, and of our plans for development and investment in infrastructure.”

The Trust wishes to highlight some contradiction within the current NPF and SPP which suggests that the process followed needs reviewed. An important question which arises is that, since there are very significant changes in the NPF3 draft currently before the parliament and many of those changes have had no public consultation about them, what is the capacity for these points to be adequately reviewed by the parliament and, if necessary, changed, in the 60 day period of scrutiny?

The process of reviewing NPF3 and SPP together is clearly intended to bring about a joined-up approach and that is a worthwhile aim. However, since NPF3 sits above the SPP, as a statutory document, it needs to clearly state government aims and how they relate to SPP. It is not adequate for the SPP to refer to an issue of national importance eg wild land, without the over-arching government policy being identified in NPF3.

EET Area of Scrutiny : *The use of the Core Areas Wild Land mapping produced by Scottish Natural Heritage (SNH) as a key tool to inform future planning for wind farm development and more clearly identifies areas to be protected.*

Whilst the aim of reviewing NPF3 and SPP together is worthwhile, the scale of the task and the time constraints may have led to some confusion over which proposals should be in which document. The CAWL map should be included in the NPF3 as it is about spatial issues and it should also be referenced in the Natural Heritage part of SPP as an asset to be protected. This is crucial to maintaining protection for the environment of Scotland's wild land, our tourist based economy and the societal benefits of these areas to health in its broadest context. We hope the committee and Parliament consider the wider context of Wild Land and Scotland's best landscapes rather than just focus on onshore wind developments and possible constraints.

One aspect of the latest draft of NPF3 which the Trust wishes to highlight is the changes in the approach to "Landscape" in the document.

NPF2 stated *"97. Scotland's landscapes are a national asset of the highest value.....*

99. Scotland's remoter mountain and coastal areas possess an elemental quality from which many people derive psychological and spiritual benefits. Such areas are very sensitive to any form of development or intrusive human activity and great care should be taken to safeguard their wild land character."

NPF3 Main Issues Report (summer 2013) stated *"In addition to our nationally important, most scenic, landscapes, we also want to continue our strong protection for our wildest landscapes."*

NPF3 parliamentary draft (January 2014) states *“4.4 Scotland’s landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland/ National Scenic Areas attract many visitors and reinforce our international image. All landscape makes an important contribution to quality of life.”*

There is no mention of wild land, wildness or the Core Area of Wild Land map in the latest draft of the NPF3.

This is despite the fact that Scottish Planning Policy consultation responses showed a two to one majority in favour of strengthened protection for wild land through the Core Areas of Wild Land map and strong wording in NPF3 and the SPP to make clear policy protection.

Of the 110 submissions supporting the wild land map, the vast majority came from Scotland, and included environmentalists, charities, businesses, local authorities, community groups, professional bodies and individuals.

Of the fewer than 50 submissions opposing wild land, almost all were from businesses with a financial interest in exploiting Scotland’s wild land – two thirds of them from outside Scotland, and one third multinational corporations from outside the UK.

EET Area of Scrutiny : [The proposal to extend the boundary between settlements and areas of search for wind farms from 2km to 2.5km.](#)

The extension of this boundary from 2.0 to 2.5km seems to be both a reasonable and prudent suggestion. Whilst the evidence about flicker and possible health effects is currently in debate and the impact of Wind Farms on property values is not conclusive, erring on the side of caution is a sensible way forward. We would however raise the need for planning to protect individual houses in future; currently some houses have turbines as close as 800m. The proposal as it currently stands is applicable to ‘settlements’ not individual houses.

EET Area of Scrutiny : [The proposal to develop the capacity for storage of energy to be exported.](#)

National Developments which were not identified in the NPF3 MIR:

The Trust was surprised to see pumped storage hydro is now a proposed National Development when it was not viewed in the April 2013 Assessment of proposed National Developments Report (proposals 26 and 163), as a good candidate and was not put forward in the Main Issues Report. The only vague indication in the MIR came under Q 5 which asked what more could be done to improve energy storage. As a consequence there has been no public consultation on this proposal.

National Developments which have no spatial indication:

Now that this National Development is suggested, another aspect of concern with this proposal and others is the lack of a spatial framework in which to consider it.

The government states regarding NPF and SPP, “*Reviewing these two key national planning policy documents at the same time will enable connections to be made between **where** we want to see development (NPF) and **how** we want to see it delivered (SPP)*”. However, the NPF gives no spatial indication of the proposed pump storage expansion, or which sites, other than Cruachan, would potentially be impacted.

EET Area of Scrutiny : [Views on the \(other\) proposed national developments.](#)

The **NPF3 Participation Statement** page 2 point 10 states “***Identification of a project as a National Development in NPF3 will establish the need for such a project***”. The Trust does not believe that the need for a National Development can be regarded as proven if it has not been described spatially and in some detail, fully consulted on and future proofed. Of as much concern is the statement that “ **The third NPF (NPF3) will set out the Government's development priorities over the next 20 –30 years**”. We view this timescale of fixed priorities as unrealistic and would cite the changes brought about by the development of the Internet from the mid-1990s as an example of our rapidly changing economy and society. To set development priorities over 20 – 30 years is unrealistic, and society’s views on the most appropriate technology or solutions will change and move on. Challenges in the storage of electricity, for example, may well be overcome and this would radically impact on a number of National Developments. We strongly recommend that the ‘20 - 30 years’ timescale statement should be removed from the documentation.

With regard to the other National Developments, the John Muir Trust will only comment on those where we have considerable expertise.

The Trust has particular concerns about the inclusion of all possible grid additions as outlined in the National Developments for the onshore electricity grid and also the offshore grids. These proposals have not been fully costed either financially or environmentally or included in the SPP as part of a national strategic energy policy. It is essential that the “need case” can be demonstrated to have been examined in detail, and future-proofed against technological changes and society’s requirements before it can be said to be proven. This is not the case for either the onshore or offshore-related grids. Of particular relevance is the advancing technology for sub-sea cabling, changes in costs and maturing of offshore energy technologies which may negate the case for building a particular transmission project onshore.

In view of the long timescale which the NPF is expected to set priorities (20 – 30 years) all proposals should still be reviewed for “need” at the time they are submitted - because the economic and technical case changes all the time, as we have seen with the recent economic upheavals.

In the NPF3 January 2014 3.7 it is stated that “*By 2020 we aim to reduce total final energy demand by 12%*”. This is an ambitious target without detail. However as a highly cost effective means of reducing energy use, energy costs and emissions, it should be prioritised in an energy hierarchy – [see JMT submission to SPP consultation](#).

Carbon Capture and Storage

We welcome the proposed use of an existing gas pipeline to transport Carbon from Grangemouth to Peterhead. This creative use of existing infrastructure is commended.

Conclusions

Wild Land and SNH’s Core Area of Wild Land (CAWL) map should be referenced in NPF3 as well as in Scottish Planning Policy (SPP) as it is a spatial issue. It is essential that the wording from the NPF3 Main Issues Report (MIR) is restored to the current document

The long-term nature of NPF3 must not be allowed to embed commercial proposals. It must include processes which allow projects to be re-examined in the light of new circumstances and the public benefit properly protected. This is a critical issue since designation in NPF3 is the mechanism for establishing the need for developments and any subsequent examination of the detailed planning implications will not be concerned with the principle of the development.

It is crucial that the NPF does not become a vehicle for fast-tracking controversial decisions, using the “national interest” argument to rule out any rigorous examination of the plan by all interested parties. **This would be a dangerous erosion of democratic rights.**

John Muir Trust
January 2014