

SUBMISSION FROM RAMBLERS' ASSOCIATION SCOTLAND

1. This document contains the views of the Ramblers' Association Scotland in respect to the proposals contained within the National Planning Framework 2. Our interest lies within the context of making Scotland a place where people choose to go walking, and where it's easy and enjoyable to do so; we are aiming for good-quality walking environments, and for making walking accessible to all.

2. It is important to have a national framework within which to make the decisions that affect the quality of life in Scotland. This second NPF is a distinct improvement on its predecessor and articulates the important issues that face our society as we plan for future developments.

Key Points

3. We welcome the statements for the vision of Scotland in 2030 that identify important aspects of landscape and wild land (paragraphs 97-99), and for greening the environment through "Green Networks" for wildlife and people (paragraphs 91, 94).

4. We support the recognition that walking and cycling can have health and environmental benefits, and welcome the intention to improve walking and cycling opportunities.

5. Potential conflicts between landscape protection and renewable energy developments need to be recognised and resolved before development proposals come before planning authorities.

6. We are concerned about the inclusion of specified transmission grid upgrades without detailed analysis of their economic, environmental and technical impacts.

Facilitating Walking

7. We welcome the recognition of the role walking will play in the Development Strategy, through Sustainable Communities (paragraph 77) and the Built Environment (paragraph 79) sections. A modal shift is required to deliver fundamental changes in transport patterns and options in Scotland. This means that walking and cycling receive a higher priority in future within transport departments, not only at local authority level, but also within Transport Scotland. We believe that the population of Scotland is aware of the need to change transport use, but will not do so unless given real incentives and the proper infrastructure to enable them to choose not to use their cars.

8. We were pleased to see mention of the potential to develop a national coastal trail, playing a strong role in sustainable tourism. We also note its lack of inclusion in the Annex on National Developments. We suggest that developing a coastal trail as a National Development would send a strong message that

promoting walking is more than fine words, and acknowledges the rising demand for good walking opportunities, tied to the economy.

Landscape Protection

9. Recognition of the value of landscapes for people, and the economic activity that they contribute, is an important point to make in this high-level policy document. In addition, articulating the sensitivity of wild land qualities and that the accumulation of small changes requires as much attention as large-scale development shows an understanding of the protection required for land outwith nationally designated sites. This is the context that should guide landscape assessment policy mechanisms at a more local level.

10. What is not clear in this proposed framework is how these aspirational policy intentions will be delivered in the individual Development Plans produced by local planning authorities, as illustrative maps in the document focus on international and national designations. A further point is how the local distinctiveness of different regional landscapes will be addressed in the absence of Structure Plans in the new planning system.

11. Following the scene setting chapters, the framework delves into infrastructure and spatial perspectives, and loses this wider policy context and how this is to be interpreted and translated down the planning hierarchy. It is not clear how local planners are to determine strategic priorities from this mixture of general policy intent and specific infrastructure proposals. This may become more clear in the proposed Action Programme. Parliamentary scrutiny of the Action Programme will therefore be essential to ensure delivery of strategic policy.

Energy

12. This is a key issue for Scotland, in terms of security of supply of electricity production and cumulative impacts of renewable energy production and associated infrastructure on Scotland's landscapes. NPF2 is the document that will determine what our landscapes will look like in the future as substantial financial investment will be made that will lock the country into a set mode of production and transmission. A sound evidential basis is required for determining what investment is essential in relation to the needs of Scottish landscapes and its people.

13. We agree that parts of the transmission system will require increased capacity to cope with different patterns of generation and consumption. Our concerns lie with the wholesale adoption of the "baseline projects" proposed by Ofgem. These projects were devised in 2001 for hypothetical amounts of renewables capacity. There was no idea of how much power would be required by different settlement patterns, nor of where the power generation would be most likely to be developed.

14. We are now closer to understanding these essential parameters through the

spatial planning to be undertaken by local authorities, as directed by SPP6 Renewable Energy, and through better understanding of power usage by existing urban centres and proposed development areas, like the development corridor between Inverness and Nairn. These growth areas will absorb substantially more power from the grid than was envisaged by the DTI and the transmission companies in 2001.

15. In addition, recent research has shown that in the early days there was little understanding of how significant amounts of power from intermittent renewable sources would be integrated into the grid, and in addition estimates of how much they would contribute to peak demand was fundamentally flawed and inconsistent with grid security. This has serious implications for the NPF2 in that decisions for electricity transmission upgrades would be based on incomplete understanding of peak demand loads and these outdated assumptions are likely to lead to overinvestment in transmission (BERR Centre for Sustainable Electricity and Distributed Generation, February 2008).

16. At this stage, in order to ensure a sustainable approach to transmission (social, economic and environmental aspects) we suggest that all the NPF can say about transmission is that some transmission reinforcement is required, and that it is the responsibility of Ofgem to conduct an economic, environmental and technical costbenefit analysis of proposed reinforcement within the perspective of the GB transmission system as a whole. Proposing eight separate electricity transmission proposals as a “National Development” does not demonstrate their actual need as alternatives are available that have not been properly assessed at a strategic level. The Statement of Need fails in this respect.

Renewable Energy Developments

17. It is stated that in paragraph 44 that growth should benefit the whole of society and should not come at the expense of our environment. At paragraph 52 there are statements that encourage action to “conserve and enhance Scotland’s distinctive natural and cultural heritage” but also to “realise the potential of Scotland’s renewable energy resources.”

18. The section on Renewable Energy (paragraphs 143-149) acknowledges the potential environmental impacts of large hydro-electric projects, but fails to apply the same caution to large-scale onshore wind. The development of large engineering works in the uplands can be highly visible over large areas, and can have an impact on peatland soils, with their water retaining and carbon-storing properties, properties that are essential in mitigating the effects of climate change.

19. The proposed framework mentions the preparation of supplementary planning guidance on the location of windfarms, but if large hydro schemes merit a precautionary statement in a national planning policy, then surely the impact of large wind turbines in upland areas also requires such recognition. The Energy

policies need to explicitly recognise this potential conflict between promotion of wind turbines in the hills and protection of valued landscapes, and not leave it to local planning authorities to deal with piecemeal renewables development proposals.