

## Members' Library Service Request Form

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Originator	Iain Mcfarlane
Originator's Ref (if any)	NPF3
Document Title	Delegated Response to Scottish Government Consultation on Main Issues Report for National Planning Framework 3

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East Lothian Council
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**REPORT TO:** Members' Library Service

**MEETING DATE:**

**BY:** Depute Chief Executive (Partnerships and Community Services)

**SUBJECT:** Delegated Response to Scottish Government Consultation on Main Issues Report for National Planning Framework 3

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## **1 PURPOSE**

- 1.1 To inform Members of the reporting procedures followed in response to the Scottish Government's consultation on the Main Issues Report (MIR) for National Planning Framework 3 (NPF3).

## **2 RECOMMENDATIONS**

- 2.1 That Members note the delegated reporting route followed in making the Council's response to NPF3 as set out in the report.

## **3 BACKGROUND**

- 3.1 The Council made submissions during the preparation of the MIR for NPF3 and sought approval from the Council on 18 December 2012 for a response as given in Annex 1

- 3.2 A 12 week consultation period on the NPF3 MIR was set to end on the 23 July 2013. This end date was during summer recess.

- 3.3 A report to Cabinet on 11 June 2013 (Annex 2) included the following recommendations that the Cabinet:

1. Notes the publication of NPF3's Main Issues Report and this summary of its content, and
2. Delegates to the Executive Director (Services for Communities) in consultation with the Spokespersons for Environment, Transportation & Roads and Economic Development and Tourism, the preparation of the Council's formal response to the consultation.

3.4 The delegated response to the NPF3 MIR dated 17 July 2013 was submitted as per Annex 3. This paper should have been submitted to the Members' Library for publication but due to administrative oversight this was not carried out. This submission is intended to rectify that oversight.

3.5 The Final NPF3 was published in June 2014

#### **4 POLICY IMPLICATIONS**

4.1 None

#### **5 EQUALITIES IMPACT ASSESSMENT**

5.1 This report is not applicable to the well being of equalities groups and an Equalities Impact Assessment is not required.

#### **6 RESOURCE IMPLICATIONS**

6.1 Financial – none

6.2 Personnel - none

6.3 Other - none

#### **7 BACKGROUND PAPERS**

7.1 Report to East Lothian Council - Scotland's Third National Planning Framework (NPF3) 18 December 2012

7.2 Report to Cabinet - Scotland's Third National Planning Framework (NPF3) – Main Issues Report 11 June 2013

7.3 Response by East Lothian Council to MIR Consultation 17 July 2013

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<b>DATE</b>	4/11/2014

**REPORT TO:** EAST LoTHIAN COUNCIL

**MEETING DATE:** 18 December 2012

**BY:** Executive Director (Services for Communities)

**SUBJECT:** Scotland's Third National Planning Framework (NPF3)

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## **1 PURPOSE**

- 1.1 To advise Members that the Scottish Government has started work on the Third National Planning Framework (NPF3), and to seek members' approval for a response to the initial consultation.

## **2 RECOMMENDATIONS**

- 2.1 It is recommended that members note that work has started on NPF3 and approve the proposed response to the initial consultation on Scotland's Third National Planning Framework.

## **3 BACKGROUND**

- 3.1 The National Planning Framework (NPF) is prepared by the Scottish Government. It sits at the top of the hierarchy of Scottish development plans and provides a framework for the spatial development of Scotland as a whole.
- 3.2 The Scottish Government has started work on the third NPF (NPF3). Once published in June 2014, NPF3 will set out the Scottish Government's strategic development priorities over the next 20-30 years. It can designate National Developments, which are considered by Ministers to be essential to Scotland's strategic spatial development. These might include major strategic transport, water and drainage and waste management infrastructure projects. Designation in the NPF establishes the need for such developments in the national interest.
- 3.3 The existing National Planning Framework (NPF2) identifies 14 National Developments, including Cockenzie Power Station as a site for new non-nuclear baseload power generation. East Lothian is also included within NPF2's 'Central Scotland Green Network' National Development. Other

examples of National Developments in NPF2 include the Replacement Forth Crossing and a high-speed rail link to London.

- 3.4 Three publications mark the start of the formal preparation process of NPF3: The Participation Statement, the Call for Candidate National Developments, and the Strategic Environmental Assessment (SEA) Scoping Report. A questionnaire has also been published, asking about the key issues for NPF3 to address.
- 3.5 At this stage interested parties have therefore been invited to put forward proposals for National Development status, and to comment on the priorities NPF3 should address and its spatial strategy. There will be further opportunities to submit comments when the NPF Main Issues Report and associated assessments are published; this is scheduled for March 2013.
- 3.6 Proposals for National Development status must be of more than regional significance, and must make a significant contribution to one or more of: (a) An 80% reduction in emissions by 2050; (b) Achieving the aims of the Zero Waste Plan; (c) The Scottish Government's Renewable Energy Targets; (d) Skills development, reducing unemployment and job creation; (e) Strengthening Scotland's links with the rest of the world; (f) Improving our digital, transport, utilities or green infrastructure networks; (g) Adapting to or mitigating the effects of climate change; (h) Improving the quality of the built or natural environment.
- 3.7 It is recommended that East Lothian Council continues to support the identification of Cockenzie Power Station in the NPF as a site for non-nuclear baseload power generation. This proposed development, and its associated gas pipeline have the required statutory permissions. It is also recommended that the Council supports the continued inclusion of the Central Scotland Green Network (CSGN) and the high-speed rail link to London as National Developments.
- 3.8 In line with priorities identified in the Council Plan 2012-17 and the Council's Economic Development Strategy 2012-2022, it is further recommended that the Council proposes dualling of the A1 east of Innerwick to the English border as a Candidate National Development on the basis that it would strengthen Scotland's links with northern England and markets beyond (see pro forma at Appendix One).
- 3.9 It is also recommended that the Council calls for a stronger focus on delivery within NPF3, including funding of strategic infrastructure proposals such as the key transport improvements required to unlock growth in the Edinburgh city region. The link and junction capacities of the A720 Edinburgh City Bypass are particular issues. Within East Lothian, capacity constraints at the Old Craighall Junction are such that Transport Scotland will raise objection to any significant development that further impacts on this, unless there is an agreed solution and a mechanism identified for its delivery. Without resolution, this position is likely to constrain the delivery of strategic housing land, of which land for affordable housing is a significant component. Transport Scotland

expects this matter to be resolved by local authorities with the funding requirement delivered through developer contributions.

- 3.10 In view of the potential impact of these capacity constraints on the economy of south east Scotland, and consequently on the wider Scottish economy, it is recommended that the Council proposes the upgrading of the A720 Edinburgh City Bypass as a Candidate National Development (see pro forma at Appendix One).
- 3.11 The estimated decommissioning date of the existing Torness Power Station is 2023. Since generation started, in 1988, the station has made a significant contribution to meeting Scotland's energy requirements. It is recommended that the importance of the Torness site be recognised by its inclusion as a Candidate National Development for future nuclear baseload generating capacity.
- 3.12 The Scottish Government has published a questionnaire that asks respondents to select from a list what they think the key ambitions are for Scotland in the long terms and what the opportunities are for planning at a national level to help achieve these ambitions. It is not recommended that the Council submits a response using the questionnaire as it would be difficult not to agree that all of the options within it are important.

#### **4 POLICY IMPLICATIONS**

- 4.1 None

#### **5 EQUALITIES IMPACT ASSESSMENT**

- 5.1 This report is not applicable to the well being of equalities groups and an Equalities Impact Assessment is not required.

#### **6 RESOURCE IMPLICATIONS**

- 6.1 Financial - None
- 6.2 Personnel - None
- 6.3 Other - None

#### **7 BACKGROUND PAPERS**

- 7.1 None

<b>AUTHOR'S NAME</b>	Phil McLean
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<b>DATE</b>	19 November 2012

## National Developments Proposal Form

<b>National Planning Framework 3 - National Developments Proposal Form</b>	
Proposer	East Lothian Council
Contact details	Phil McLean 01620 827017 pmclean@eastlothian.gov.uk
Date	15/11/2012
Title of development	<b>Dualling of the A1(T)</b>
Elements to be covered by national development status (list)	Dualling of remaining single carriageway stretches of A1(T) between Dunbar and the English Border. Associated junction alterations and improvements.
Fit with criteria and statement of more than regional importance (guide - 500 words)	<p>This development is of national significance and would meet the criterion 'improve Scotland's links with the rest of the world'.</p> <p>NPF2 identifies this route as a 'strategic freight corridor' and notes that <i>"Cross-Border road and rail links are of prime economic importance ... The economic benefits of tourism can be spread more widely if more of Scotland can be brought within 3 hours of major English cities. ... Reducing journey times on routes between Aberdeen and Newcastle would improve the connectivity of knowledge economy clusters on the East Coast. ... The Scottish Government will work with the UK Government and other bodies to strengthen cross-Border transport links."</i></p> <p>East Lothian Council believes that support for dualling of the A1(T) is an essential component of achieving this ambition. It would reduce journey times between the Edinburgh city region and the Tyne and Wear conurbation and make them more reliable, with benefits for trade between the two regions and wider national benefits.</p> <p>The A1(T) is one of the key road links with England and it is also significant that as a low-lying route it is the one least likely to be affected by winter weather.</p>
Location (description, map reference, or map)	A1(T) between Dunbar and English Border.



<b>Public Engagement to date (guide - 100 words)</b>	<b>None specifically on this project, however there is a history of support for improvements to the A1 since the late 1980s (the A1 Safelink Campaign).</b>
Environmental Study / Assessment available? (yes / no)	No
<i>If yes, what significant effects were identified</i>	
Delivery timescale	Not applicable at this stage
Development lifespan	Not applicable at this stage
Consents required	Planning permission
Visual representation of the development available? <i>If yes, please list and state if provided.</i>	No but current route of A1(T) is readily identifiable.

<b>National Planning Framework 3 - National Developments Proposal Form</b>	
Proposer	East Lothian Council
Contact details	Phil McLean 01620 827017 pmclean@eastlothian.gov.uk
Date	15/11/2012
Title of development	<b>Upgrading of the A720(T) Edinburgh city bypass</b>
Elements to be covered by national development status (list)	Grade separation of Sheriffhall roundabout and assessment and capacity increases of other junctions including Old Craighall interchange.
Fit with criteria and statement of more than regional importance (guide - 500 words)	<p>This development is of national significance and would meet the criterion 'improve Scotland's links with the rest of the world'.</p> <p>The STPR identifies the A720(T) as part of the national transport corridor linking SE Scotland with the west, north and north-east of the country.</p> <p>Movement of freight is fundamental to economic growth so transport links need to be fit for purpose in providing links to ports, the wider UK and global markets.</p> <p>NPF2 identifies this route as a 'strategic freight corridor' and notes that <i>"The economic benefits of tourism can be spread more widely if more of Scotland can be brought within 3 hours of major English cities. ... Reducing journey times on routes between Aberdeen and Newcastle would improve the connectivity of knowledge economy clusters on the East Coast. ... The Scottish Government will work with the UK Government and other bodies to strengthen cross-Border transport links."</i></p> <p>East Lothian Council believes that support for upgrading of the A720(T) is an essential component of achieving this ambition. It would reduce journey times between the Edinburgh city region and the Tyne and Wear conurbation and make them more reliable, with benefits for trade between the two regions and wider national benefits.</p>
Location (description, map reference, or map)	A720(T) between and including Gogar roundabout and Old Craighall interchange.

Public Engagement to date (guide - 100 words)	None specifically on this project.
Environmental Study / Assessment available? (yes / no)	No
<i>If yes, what significant effects were identified</i>	
Delivery timescale	Not applicable at this stage
Development lifespan	Not applicable at this stage
Consents required	Planning permission
Visual representation of the development available? <i>If yes, please list and state if provided.</i>	No but current route of A720(T) is readily identifiable.

<b>National Planning Framework 3 - National Developments Proposal Form</b>	
Proposer	East Lothian Council
Contact details	Phil McLean 01620 827017 pmclean@eastlothian.gov.uk
Date	15/11/2012
Title of development	<b>Torness Power Station – safeguard for future nuclear baseload generating capacity</b>
Elements to be covered by national development status (list)	The operational and non-operational land associated with the generation of electricity by British Energy at Torness Power Station.
Fit with criteria and statement of more than regional importance (guide - 500 words)	This development is of national significance and would meet the criteria of an '80% reduction in emissions by 2050', 'Skills development, reducing unemployment and job creation' and 'adapting to or mitigating the effects of climate change.' Torness will be decommissioned in 2023. Given its importance as a baseload generating station, consideration should be given now to the future contribution the site can make to Scotland's generating capacity.
Location (description, map reference, or map)	Torness Power Station
Public Engagement to date (guide - 100 words)	None specifically on this project.
Environmental Study / Assessment available? (yes / no)	No
<i>If yes, what significant effects were identified</i>	
Delivery timescale	Not applicable at this stage
Development lifespan	Not applicable at this stage
Consents required	Permission under the Electricity Act
Visual representation of the development available? <i>If yes, please list and state if provided.</i>	No but site is readily identifiable.



**REPORT TO:** Cabinet

**MEETING DATE:** 11 June 2013

**BY:** Executive Director (Services for Communities)

**SUBJECT:** Scotland's Third National Planning Framework (NPF3)  
– Main Issues Report

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## **1 PURPOSE**

- 1.1 To advise Cabinet that the Scottish Government has published for consultation the first formal stage (Main Issues Report) in the preparation of its third National Planning Framework (NPF3), and to provide a summary of its main provisions. The Scottish Government has allowed for a 12 week consultation period on the MIR which ends on 23 July 2013.

## **2 RECOMMENDATIONS**

- 2.1 It is recommended that Cabinet:
- 1 Notes the publication of NPF3's Main Issues Report and this summary of its content, and
  - 2 Delegates to the Executive Director (Services for Communities) in consultation with the Spokespersons for Environment, Transportation & Roads and Economic Development and Tourism, the preparation of the Council's formal response to the consultation.

## **3 BACKGROUND**

- 3.1 The National Planning Framework (NPF) is prepared by the Scottish Government. It sits at the top of the hierarchy of Scottish development plans and provides a framework for the spatial development of Scotland as a whole. When approved, NPF3 will set out the Scottish Government's strategic development priorities over the next 20-30 years.

- 3.2 NPF3's Main Issues Report (MIR) sets out the Scottish Government's preferred spatial strategy and a suite of national developments to support it. It also identifies alternative approaches. National Developments, which are considered by Ministers to be essential to Scotland's strategic spatial development. These might include major strategic transport, energy, water and drainage and waste management infrastructure projects. Designation in the NPF establishes the need for such developments in the national interest.

*Vision*

- 3.3 The preferred strategy for NPF3 is to build on Scotland's opportunities. In moving from NPF2 towards NPF3 the MIR acknowledges that the process is an evolutionary one. It's vision for Scotland is

- **A low carbon place:** for example, prioritising offshore renewables infrastructure; facilitating carbon capture and storage; reinforcing the grid, and supporting further onshore wind farms (while protecting nationally important landscapes and residential amenity).
- **A natural place to invest:** for example: focussing on Scotland's environment as a ecosystem; understanding key natural and cultural assets; supporting tourism, and balancing zero waste ambition with local delivery of waste and resource services;
- **A successful, sustainable place:** for example, highlighting how planning can help ensure that Scotland is a great place to do business; promotes high quality, distinctive, sustainable and healthy places; reflects the importance of cities as drivers of the economy, and maintains a flexible approach to housing provision;
- **A connected place:** for example, world class digital infrastructure; make best use of existing infrastructure; support decarbonising transport sector; identify enhancements to specific port facilities and further new freight capacity on the Forth as national developments, and identify a high speed rail service between Edinburgh and Glasgow and, in time, south to London as a national priority.

*A low carbon place*

- 3.4 In this context, the need to reduce greenhouse gas emissions is a key issue. The MIR notes that draft Scottish Planning Policy makes clear that the Scottish Government does not wish to see new wind farms in National Parks and National Scenic Areas. It is proposed that key onshore infrastructure requirements arising from key offshore renewable energy projects should be identified as a national development in NPF3.
- 3.5 The MIR proposes to identify the key onshore infrastructure requirements arising from offshore projects such as the offshore wind energy projects off the Firths of Forth and Tay as national development in NPF3. The

MIR recognises the need for co-ordination between projects, focussing connection on a limited number of key hubs. It further notes that this would be consistent with the recognition of key locations such as **Cockenzie** and Peterhead within the preferred spatial strategy.

- 3.6 There is further reference to **Cockenzie** under NPF3's intention to retain Cockenzie as a national development for non-nuclear, baseload generating capacity, either as a new or refurbished electricity generating plant, to be fitted with carbon capture technology by 2030.
- 3.7 The MIR confirms there will be no nuclear new build in Scotland (ELC had requested that **Torness** be designated as a national development safeguard for future baseload capacity. However, the MIR advises that the Scottish Government has not ruled out extending the operating life of Hunterston and **Torness** to maintain security of supply while the transition to renewables and clean thermal generation takes place.
- 3.8 As part of the National Renewables Infrastructure Plan (NRIP) sites have been identified with the potential to become hubs for development and investment in renewable energy. Such sites require to be well-connected by land and sea. Within the Forth and Tay area, the ports of Leith, Methil and Dundee are identified as Phase 1 sites. Additional Phase 2 sites with potential are also identified, Burntisland being the only one currently identified in the Forth and Tay area.

*A natural place to invest*

- 3.9 The MIR notes that draft Scottish Planning Policy indicates that assets like prime quality agricultural land, woodland and deep peat should be protected, and that this protection should be balanced against the need for new development and infrastructure. The scenic qualities of Scotland's landscapes and the importance of tourism are recognised. An enhanced network of long-distance paths is encouraged.
- 3.10 East Lothian's agricultural plain has extensive areas of prime quality agricultural land. Both the John Muir way and the National Cycle Network cross East Lothian.
- 3.11 A continuing requirement for locally sourced minerals for construction is recognised, particularly in the Central Belt. A continuing need for sources of coal for Longannet power station is also recognised. The potential resources of shale gas and coal bed methane in the Central Belt are noted.
- 3.12 On waste, the MIR notes that NPF3 does not intend to provide a more specific steer on the locations and types of required nationally significant facilities. Rather, given the pace of technological change, there is a need to maintain a flexible, market-driven approach to provision for the waste and resource management sector.



### *A successful, sustainable place*

- 3.13 Draft Scottish Planning Policy emphasises place making, including the key qualities of successful places: distinctive, welcoming, adaptable, resource efficient, safe and pleasant and easy to move around and beyond. The principles are to be applied to the national spatial strategy and are seen as equally applicable to development planning.
- 3.14 Settlement strategy should facilitate climate change adaptation. The importance of cities and city-regions will continue to be a key theme in NPF3. The need to develop a different approach to planning for town centre revitalisation is recognised, including a broader mix of land uses and full assessment of town centre assets and sites when considering new investment.
- 3.15 The Central Scotland Green Network, of which East Lothian is a part, continues to be supported as a national development. The MIR considers it should focus on active travel networks and bringing vacant and derelict land back into use, and focus projects in areas where there is economic disadvantage and poor health.
- 3.16 The MIR advises that the total number of households in Scotland is expected to increase by 23% by 2035. This growth is projected to be highest in Edinburgh, Perth and Kinross, Aberdeen/Aberdeenshire and **East Lothian**. It notes that the economic downturn has led to lower than expected house completions. However, the MIR advises that there is a need for a significant increase in housebuilding rates to ensure housing requirements are met. NPF3 advises that it can play its part by ensuring that infrastructure is better co-ordinated with planned development.
- 3.17 The MIR advises that strategic and local development plans must focus on the requirement for a generous supply of effective housing land. The Scottish Government wishes to see a more concerted effort to deliver a generous supply of housing land in South East Scotland, noting that the future spatial strategy for delivering this land will need to acknowledge or address the infrastructure constraints that exist here.
- 3.18 It is noted that NPF3 does not intend to set regional targets for housing development. An earlier ELC submission suggested that this be considered. Indeed, there is an argument that in a small country like Scotland there is perhaps no need for three levels of planning. NPF3 could undertake the high level, strategic planning functions of the four SDP authorities, particularly since the Scottish Government has a more direct control over investment in, and delivery of, much of the necessary infrastructure required to support strategic development.

### *A connected place*

- 3.19 On the matter of transport infrastructure, the MIR notes that NPF3 does not intend to revisit the transport infrastructure priorities within the Strategic Transport Projects Review (STPR). East Lothian Council recommended that the dualling of the A1 and capacity improvements to

its junctions, and improvements to the A720 City Bypass should be identified as national developments – neither of these features in NPF3’s preferred strategy, presumably because they are not included in the STPR.

- 3.20 The MIR does note that, around Edinburgh, the capacity of the strategic and local road networks, particularly the A720, has implications for housing and business development in the surrounding area. Strategic and local development plans will have to take due account of potential impacts on transport infrastructure and address any capacity issues this raises. Given the importance of SE Scotland to the Scottish economy, and the acknowledged infrastructure constraints here, it is disappointing to note that no more direct interventions appear to be planned by the Scottish Government, other than non-specific intelligent transport systems and targeted road congestion relief.
- 3.21 The MIR notes investment plans to accelerate the roll out of the next generation broadband to all parts of rural Scotland over the next five years.
- 3.22 In relation to international ports, the expansion of Aberdeen Harbour, the Grangemouth Investment Zone and additional container freight capacity on the Forth are the MIR’s preferred approach. Their designation as national developments is the MIR’s preferred strategy. Interestingly in this regard is the comment that there is potential for port-related development at **Cockenzie**. This is clearly something that ELC should pursue with the Scottish Government and relevant agencies.
- 3.23 On high speed rail, the preferred strategy is to retain a high speed rail link to London as a national development but to broaden this to incorporate plans for a high speed link between Glasgow and Edinburgh.

#### *Next Steps*

- 3.24 This report is intended to provide Cabinet with a summary of NPF3’s preferred strategy and its main proposals. Given that the consultation period ends on the 23<sup>rd</sup> July 2013, it is suggested that the Council’s response be delegated to the Executive Director, Services for Communities, in consultation with the Spokespersons for Environment and Economic Development and Tourism.

## **4 POLICY IMPLICATIONS**

- 4.1 None at this stage, although an approved NPF3 may have policy implications for strategic and local development plans.

## **5 EQUALITIES IMPACT ASSESSMENT**

- 5.1 This report is not applicable to the well being of equalities groups and an Equalities Impact Assessment is not required.

## **6 RESOURCE IMPLICATIONS**

- 6.1 Financial - None  
6.2 Personnel - None  
6.3 Other - None

## **7 BACKGROUND PAPERS**

- 7.1 NPF2, the Scottish Government, 2009  
7.2 NPF3, Main Issues Report, the Scottish Government, 2013

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<b>DATE</b>	23 May 2013

**Scotland's Third National Planning Framework (NPF3)  
Main Issues Report**

**RESPONSE BY EAST Lothian COUNCIL TO MIR CONSULTATION**

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**1 General Remarks**

- 1.1 East Lothian Council welcomes the publication of the NPF3 Main Issues Report (MIR) and its role in taking forward the update of a planning framework setting out many national land use planning priorities and challenges within an accessible document.
- 1.2 The Council believes that previous NPF's have perhaps missed out on the opportunity to take a more robust involvement in national issues such as housing land and renewable energy, by setting a regional requirement taken within a national context. It appears that the current review maintains this previous approach.
- 1.3 The Council is disappointed to note that its suggestions for national developments have not been accepted, and urges the Scottish Government to review this decision. However, the Council is pleased to note, and supports, the continued national significance given to Cockenzie for power generation and the intention to confer national development status on Cockenzie as a renewables interconnector hub and for port-related development.

**2 A low carbon place**

- 2.1 The Council supports the recognition of the need to reduce greenhouse gas emissions as a key issue. It is noted that the MIR acknowledges that draft Scottish Planning Policy makes clear that the Scottish Government does not wish to see new wind farms in National Parks and National Scenic Areas. The Council views this as a restricted range of protection and considers that the national interest would be better served if the Scottish Government, through NPF3, were to take a more proactive role in determining the regional capacity for windfarm development. Additionally, more local landscape designations and policy, properly justified, should be given greater materiality in national policy and in planning decisions.

- 2.2 On the matter of wild land, the Council does not consider that the SNH mapping takes enough account of the need to find wild areas closer to where people live. The wild areas have to be over a certain threshold of 'wildness' and also over a certain size. This means that only larger, more remote areas have been designated. Understandably, these areas are wilder: however, their purpose is presumably so people can experience wildness (rather than so the areas can remain wild unnoticed). Protecting these areas means development is likely to be forced into areas closer to settled areas, making them relatively even less wild. This makes it more difficult for people of limited means to access even relative wildness.
- 2.3 The Council does not believe that enough account has been taken of the coast as a contributor to wildness experience. The coast is genuinely wild – the experience of looking out to sea is generally the same as would have been experienced hundreds of years ago. It also modifies other wildness detractors e.g. by itself having a distinctive noise and odour, thereby diminishing industrial or road noise and odours from other sources from nearby. NPF3 could indicate that local authorities should also map their own wildness based on the relative wildness maps.
- 2.4 The MIR proposes that the key onshore infrastructure requirements arising from offshore projects such as the offshore wind energy projects off the Firths of Forth and Tay should be recognised as national development in NPF3. The MIR also recognises the need for co-ordination between projects, focussing connection on a limited number of key hubs. It further notes that this would be consistent with the recognition of key locations such as Cockenzie and Peterhead within the preferred spatial strategy. There is further reference to Cockenzie under NPF3's intention to retain Cockenzie as a national development for non-nuclear, baseload generating capacity, either as a new or refurbished electricity generating plant, to be fitted with carbon capture technology by 2030.
- 2.5 East Lothian Council welcomes the recognition of the potential of Cockenzie in these regards and fully supports the principle of these uses being designated as national developments in NPF3. There is particular support for Cockenzie's recognition as a key hub for offshore renewable energy, including onshore electricity connections, substations and converter stations. In supporting this designation, the Council would also welcome and would wish to facilitate any further servicing or manufacturing activity related to the off-shore renewable industry that might be attracted to Cockenzie as a consequence of such national designation.
- 2.6 The Council believes that the Cockenzie area has a number of infrastructure and locational advantages that make it well-suited to delivering these national developments (and also its potential for port-related activity – see para 2.16). These include the following:
- a) it has deep water and any required quayside facilities would be free of constraints such as reliance on tidal access

- b) being nearer the major sea lanes/ports than other facilities further up the estuary gives Cockenzie a time and fuel advantage
  - c) the area has good access to the A1 and to markets both north and south of the border
  - d) the area benefits from an existing rail spur directly off the east coast main line
  - e) there are substantial reserves of developable land, even allowing for the retention of an electricity generating use: if required, additional flexibility might be available by using some of the nearby vacant land associated with the proposed Blindwells new settlement
- 2.7 The Council notes with disappointment that the MIR confirms there will be no nuclear new build in Scotland and that the Council's submission that Torness be designated as a national development safeguard for future baseload capacity has not been accepted. However, the Council would support an extension of the operating life of Torness.

#### **A natural place to invest**

- 2.8 The MIR notes that draft Scottish Planning Policy indicates that assets like prime quality agricultural land, woodland and deep peat should be protected, and that this protection should be balanced against the need for new development and infrastructure.
- 2.9 East Lothian's agricultural plain contains some of the most productive farmland in Scotland. Security of food supply and maximising locally-sourced produce are emerging issues. East Lothian is an area of high demand for housebuilding, it is an integral part of SESplan and has close links to the Edinburgh housing market area. In the absence of any real brownfield resource, housing development in East Lothian is largely on greenfield land and, generally, this means land of prime agricultural quality. The balance between development and retention of prime land is inevitably heavily weighted in favour of the former. NPF3 itself should consider if there is a need for a stronger presumption against the use of prime land as a national resource.

#### **A successful, sustainable place**

- 2.10 The Council notes that the growth in households to 2035 is projected to be highest in Edinburgh, Perth and Kinross, Aberdeen/Aberdeenshire and East Lothian. The Council also notes the MIR's acknowledgement that there is a need for a significant increase in housebuilding rates to ensure housing requirements are met, and that NPF3 can play its part by ensuring that infrastructure is better co-ordinated with planned development. It is further noted that the Scottish Government wishes to see a more concerted effort to deliver a generous supply of housing land in South East Scotland, noting that

the future spatial strategy for delivering this land will need to acknowledge or address the infrastructure constraints that exist here.

- 2.11 The Council notes that NPF3 does not intend to set regional targets for housing development. An earlier East Lothian Council submission suggested that this be considered. Indeed, there is an argument that in a small country like Scotland there is no need for three levels of planning. NPF3 could undertake the high level, strategic planning functions of the four SDP authorities, particularly since the Scottish Government has a more direct control over investment in, and delivery of, much of the necessary infrastructure required to support strategic development.
- 2.12 On the matter of better infrastructure co-ordination with planned development, the Council believes that neither the current MIR nor previous NPF's have properly addressed infrastructure provision, particularly within the SESplan area where the MIR requires 'a more concerted effort to deliver a generous supply of housing'. To deliver this, East Lothian Council believes that the required scale of infrastructure provision, particularly for trunk road and junction capacity and new schools, requires direct Scottish Government funding intervention. Without this, the development industry is often unable to secure the required up-front funding: strategic housing land allocations, in places where people would otherwise wish to live, remain undeveloped: subsequent plan failure is a real possibility.

#### **A connected place**

- 2.13 On the matter of transport infrastructure, it is noted that NPF3 does not intend to revisit the transport infrastructure priorities within the Strategic Transport Projects Review (STPR). East Lothian Council previously recommended that the dualling of the A1 and capacity improvements to its junctions, together with improvements to the A720 City Bypass, should be identified as national developments – neither of these features in NPF3's preferred strategy. There seems to be a disconnect between the priorities of the STPR and the priorities of national land use planning strategy (see previous paragraphs). Given the importance of SE Scotland to the Scottish economy, and the acknowledged infrastructure constraints here, it is disappointing to note that no more direct interventions appear to be planned by the Scottish Government, other than non-specific intelligent transport systems and targeted road congestion relief. East Lothian Council requests that NPF3 reconsiders the decision not to include these infrastructure projects as national developments. A reconsideration of the A1 dualling as a national development decision should have regard to the recent announcement (27 June 2013) by the Chief Secretary to the Treasury that a feasibility study is to be carried out on dualling the A1 in Northumberland.
- 2.14 The Council notes that, in relation to international ports, the expansion of Aberdeen Harbour, the Grangemouth Investment Zone and additional

container freight capacity on the Forth are the MIR's preferred approach. Their designation as national developments is the MIR's preferred strategy. The Council notes with interest the comment that there is potential for port-related development at Cockenzie.

- 2.15 East Lothian Council has set itself a challenging economic strategy. In making progress towards its aspirations for substantial employment growth opportunities such as this are to be welcomed. The Council is pleased that the MIR recognises Cockenzie's potential and urges Scottish Ministers to confirm national development status in NPF3 on its use for port related development, as well as a renewable energy interconnector hub.
- 2.16 The benefits offered by Cockenzie in respect of renewable energy, described in para 2.6 above, are equally applicable to its potential for port-related development. In addition, there is potential to consider the development of a cruise liner facility in association with any port facility, making use of the benefits of its location and its proximity to Scotland's capital and to the attractions that East Lothian itself offers.

#### **Areas of Co-ordinated Action**

- 2.17 East Lothian lies within the Firth of Forth Area of Co-ordinated Action. The MIR notes that issues here include (i) accommodating the continuing strong demand for growth in the Edinburgh area within a constrained infrastructure network and sensitive environment and (ii) recognising the Firth of Forth as a key economic asset, supporting numerous nationally significant assets and linking with offshore development.
- 2.18 Being an area with national/international environmental designations, East Lothian recognises its responsibilities in this regard. The Council also recognises and supports the benefits of sustainable economic growth. In Cockenzie, it believes it has a location that can make a major contribution to local and national economic growth and supports its proposed national designations. The Council also recognises that, as a key economic asset, developers and local authorities within the SESplan area must be supported in their efforts to overcome infrastructure capacity issues that threaten to constrain this growth potential for both economic development and housing growth. NPF3 should be more specific about how key infrastructure capacity is to be delivered, and by whom.

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