

NPF 3 Main Issues Report: Consultation Questionnaire

Please send your response to npfteam@scotland.gsi.gov.uk by July 23, 2013.

RESPONDENT INFORMATION – this is to ensure that we handle your response appropriately.

1. Name/Organisation

Organisation Name

Institute of Historic Building Conservation

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Cartwright

Forename

Richard

2. Postal Address

c/o North Lanarkshire Council

Fleming House

Cumbernauld

CartwrightR@northlan.gov.uk

Postcode G67 1JW

Phone 01698 632628

Email

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

A LOW CARBON PLACE

1. How can NPF3 support the transition to a largely decarbonised heat sector?

Could NPF3 go further in supporting a spatial framework to help achieve our ambition of decarbonising the heat sector and guiding the necessary infrastructure investments?

It could strengthen and better recognise the important role of embodied energy held by our existing building stock, and more strongly deter demolition and encourage re-use, in accordance with the new Sc Govt Policy on Architecture and Place which states (on page 55 Design for a Low Carbon Economy): “A ‘re-use not replace’ approach should be considered first when dealing with our existing built environment.”

2. How should we provide spatial guidance for onshore wind?

Scottish Planning Policy already safeguards areas of wild land character. Do you agree with the Scottish Government’s proposal that we use the SNH mapping work to identify more clearly those areas which need to be protected?

Should NPF3 identify and safeguard those areas where we think there remains the greatest potential for further large scale wind energy development? Where do you think this is?

Should further large scale wind energy development be focused in a few key locations or spread more evenly across the country?

Is spatial guidance for onshore wind best left to local authorities?

3. How can onshore planning best support aspirations for offshore renewable energy?

Should we include onshore infrastructure requirements of the first offshore wind developments, wave and tidal projects as a national development?

4. How can we support the decarbonisation of baseload generation?

Do you think that NPF3 should designate thermal power generation at Peterhead and/or a new CCS power station at Grangemouth, with associated pipeline infrastructure, as national developments?

NPF 3 Main Issues Report: Consultation Questionnaire

Is there also a need for Longannet and Cockenzie to retain their national development status as part of a strategy of focusing baseload generation on existing sites?

5. What approach should we take to electricity transmission, distribution and storage?

Should we update the suite of grid enhancements and include the landfall of a possible interconnector from Peterhead? What projects should be included?

What more can NPF3 do to support the development of energy storage capacity?

6. Does our emerging spatial strategy help to facilitate investment in sites identified in the National Renewables Infrastructure Plan?

Are there consenting issues or infrastructure requirements at NRIP sites that should be addressed in NPF3 through national development status or other support?

A NATURAL PLACE TO INVEST

7. Can NPF3 do more to support sustainable use of our environmental assets?

Should NPF3 propose any specific actions in relation to the role of land use in meeting climate change targets, for example for woodland expansion, peatland or habitat restoration?

Should the strategy be more aspirational in supporting the development of a National Ecological Network? If so, what should the objectives of such a network be?

It could strengthen and better recognise the important role of embodied energy held by our existing building stock, and more strongly deter demolition and encourage re-use, in accordance with the new Sc Govt Policy on Architecture and Place which states (on page 55 Design for a Low Carbon Economy): “A ‘re-use not replace’ approach should be considered first when dealing with our existing built environment.”

8. What should NPF3 do to facilitate delivery of national development priorities in sensitive locations?

Would it be helpful for NPF3 to highlight the particular significance of habitat enhancement and compensatory environmental measures around the Firth of Forth? Which projects can deliver most in this respect?

Are there other opportunities for strategic environmental enhancement that would support our wider aspirations for development, or could potentially compensate for adverse environmental impacts elsewhere?

9. Can NPF3 do more to support sustainable tourism?

What are the key national assets which should be developed to support recreation and tourism?

Should a national network of long distance routes be designated as a national development? What new links should be prioritised?

How can we ensure that best use is made of existing supporting infrastructure in order to increase the cross-sectoral use of these routes, and enhance the quality of the visitor experience?

(1) There is no mention in the NPF of the key heritage and cultural assets of its World Heritage Sites- this should be remedied. There should also be more mention given to other aspects of the built heritage environment, including its significant contribution to sustainable tourism.

(2) Town Centres, small towns, and landscapes more generally should be mentioned.

(3) Settings and buffer zones for all designated assets should also be given coverage.

(4) Green Belts need to be actively managed and each should have a Conservation-based Management Plan to make the most of them.

(5) A discussion on the value of National Parks including the possible promotion of further National Parks would also be appropriate here.

(6) Material from the new A&P Policy may also be appropriate for inclusion in this section.

10. Can NPF3 do more to support sustainable resource management?

Should NPF3 support a decentralised approach to provision for waste management or should NPF3 make provision for more strategic waste facilities?

NPF 3 Main Issues Report: Consultation Questionnaire

Should the Metropolitan Glasgow Strategic Drainage Plan be retained as a national development in NPF3 or should we replace the focus on it with a broader, national level approach to sustainable catchment management?

The NPF could strengthen and better recognise the important role of embodied energy held by our existing building stock, and more strongly deter demolition and encourage re-use, in accordance with the new Sc Govt Policy on Architecture and Place which states (on page 55 Design for a Low Carbon Economy): “A ‘re-use not replace’ approach should be considered first when dealing with our existing built environment.”

A SUCCESSFUL, SUSTAINABLE PLACE

11. How can we help to consolidate and reinvigorate our existing settlements and support economic growth and investment through sustainable development?

What more can NPF3 do to support the reinvigoration of our town and city centres and bring vacant and derelict land back into beneficial use?

How can NPF3 support our key growth sectors?

Should the Dundee Waterfront be designated as a national development?

Should the redevelopment of the Ravenscraig site be designated as a national development?

Could NPF3 go further in indicating what future city and town centres could look like, in light of long term trends including climate change, distributed energy generation and new technologies?

How can the strategy as a whole help to unlock the potential of our remote and fragile rural areas?

Two aspects would be to stress the need to build on existing character and sense of place; and to improve the design quality of new development.

12. How can NPF3 best contribute to health and wellbeing through placemaking?

Should the Central Scotland Green Network continue to be designated as a national development? What do you think its top priorities should be? How can it better link with other infrastructure projects in Central Scotland?

There is insufficient emphasis in the NPF of the built heritage environment, including its significant contribution to placemaking. Certain aspects of our built and cultural heritage can also make significant contributions to health and wellbeing by promoting outdoor visits and walking, eg World Heritage Sites, landscaped parks and gardens, archaeological sites, castles and larger listed building sites.

In terms of the CSGN, the Loch Lomond and The Trossachs National Park should be included within the designated area.

13. How can NPF3 help to deliver sufficient homes for our future population?

Are there spatial aspects of meeting housing needs that NPF3 could highlight and help to tackle?

A CONNECTED PLACE

14. How can NPF3 help to decarbonise our transport networks?

Is our emerging spatial strategy consistent with the aim of decarbonising transport?

Are there any specific, nationally significant digital infrastructure objectives that should be included in NPF3?

Should NPF3 go further in promoting cycling and walking networks for everyday use, and if so, what form could this take at a national scale?

15. Where are the priorities for targeted improvements to our transport networks?

Are there other nationally significant priorities for investment in transport within and between cities?

As well as prioritising links within and between cities, what national priorities should NPF3 identify to improve physical and digital connections for rural areas?

16. How can NPF3 improve our connections with the rest of the world?

Should the Grangemouth Investment Zone, Aberdeen Harbour and new freight capacity on the Forth be designated as national developments?

NPF 3 Main Issues Report: Consultation Questionnaire

Should Hunterston and Scapa Flow be viewed as longer-term aspirations, or should they retain national development status?

Do you agree that the aspirations for growth of key airports identified in NPF2 should remain a national developments and be expanded to include Inverness, and broadened to reflect their role as hubs for economic development?

Should the proposed High Speed Rail connection to London be retained as a national development? Should it be expanded to include a high speed rail line between Edinburgh and Glasgow?

Alternatively, should High Speed Rail be removed as a national development and instead supported as a part of the longer-term spatial strategy?

Strategic Environmental Assessment – Environmental Report

1. What do you think of the environmental baseline information referred to in the Environmental Report? Are you aware of further information that could be used to inform the assessment findings?
2. Do you agree with the assessment findings? Are there other environmental effects arising from the Main Issues Report and Draft SPP?
3. Taking into account the environmental effects set out in the report, what are your views on:
 - a) The overall approach to NPF3, as outlined in the Main Issues Report, including key strategy proposals.
 - b) The strategic alternatives, as highlighted in the questions in the Main Issues Report?
 - c) The proposed suite of national developments to be included in the Proposed Framework?
 - d) Alternative candidate national developments?
 - e) The policies proposed for the Draft SPP?
 - f) The key questions for consultees set out in the Draft SPP?
4. What are the most significant negative effects arising from the assessment that should be taken into account as the NPF and SPP are finalised?
5. How can the NPF and SPP be enhanced, to maximise their positive environmental effects?
6. What do you think of the proposed approach to mitigation and monitoring proposed in Section 6?

(1) IHBC would make one comment on the SEA-Envtl Report, relevant to Qns 2 & 4: Pages 18-19 on Town Centres. General comment on this section is that IHBC would endorse most of the statement in the joint SPP/ NPF Environmental Report page 226 on Town Centres: Cultural Heritage issues, that; “Effects on the historic built environment may benefit from further consideration.

The emphasis of the policy is on improving town centres by making use of existing buildings, and this could provide benefits. The current draft of the policy could make further reference to physical structure of town centres and cultural activities. A more robust approach could be to recognise the intrinsic cultural heritage value and importance of town centres and to use this as an asset upon which local distinctiveness and identity can be strengthened. There will also be a need to overcome constraints of the historic fabric in providing innovative approaches to town centre regeneration, and planning has a key role to play in this.” The exception to this endorsement is the final sentence above whose reference to the constraints of the historic fabric needing to be overcome, is unfortunate and not in line with latest government view elsewhere that the HE should be seen positively as an asset/ opportunity and NOT a constraint.

(2) IHBC suggests there should be reference to and some discussion of the implications of, and potential improvements offered by, the recently published Town Centres Review.

(3) The recent Policy on Architecture and Place should also be mentioned; albeit that

NPF 3 Main Issues Report: Consultation Questionnaire

IHBC considers that this requires a great deal more work to achieve anything like the aspirations which we have for architecture and place in Scotland.

Equality Impact Assessment (EqIA)

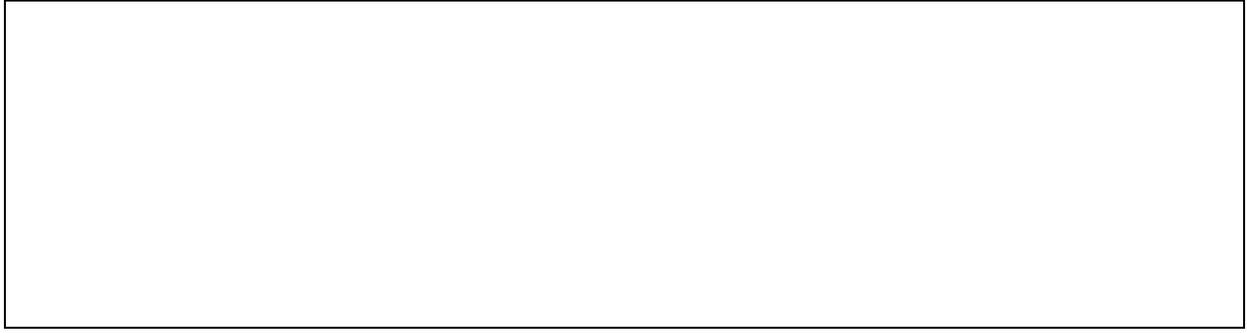
In relation to the Equality Impact Assessment, please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any particular groups of people.

In relation to the Equality Impact Assessment, please tell us what potential there may be within these proposals to advance equality of opportunity between different groups and to foster good relations between different groups.

Business and Regulatory Impact Assessment (BRIA)

In relation to the Business and Regulatory Impact Assessment, please tell us about any potential impacts, either positive or negative, you feel the proposals in this consultation document may have on business.

NPF 3 Main Issues Report: Consultation Questionnaire

A large, empty rectangular box with a thin black border, occupying the upper portion of the page. It is likely a placeholder for a questionnaire or report content.