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7 April 2008

Mr James MacKinnon  
Chief Planner  
Freepost RRHE-GBSA-BJLR  
National Planning Framework Team  
The Scottish Government Planning Directorate  
Victoria Quay  
Leith  
Edinburgh EH6 6QQ

Dear Mr MacKinnon

### **NATIONAL PLANNING FRAMEWORK 2: DISCUSSION DRAFT**

As the lead body for the Central Scotland Forest (CSF), Central Scotland Forest Trust (CSFT) welcomes the opportunity to comment on the draft. We are pleased to note the supportive references to the CSF in the text and inclusion of the Forest Boundary on Map 14.

### **Central Scotland Green Network**

We note and fully support the intention to establish a Central Scotland Green Network (CSGN) at the heart of which would be the Central Scotland Forest. We are already actively pursuing working arrangements with the G&CV Green Network partnership to our west and are supporting (through staff input) the newly formed Edinburgh and the Lothians Forest Habitat Network Partnership to our east to ensure that our approaches can be aligned, particularly, on our boundaries such that integration (at a policy level and on the ground) will take place. We believe that recognition of the Green Network will support this process further.

We confirm that we are happy to work closely with your team, Forestry Commission Scotland, the relevant local authorities and our neighbouring woodland and regeneration initiatives to realise the delivery of the Central Scotland Green Network by 2030. The exact nature of this joint working will become clear over the coming months but we would put forward the following in respect of the NPF2 Action Programme:

1. **identification of the preferred Green Network** across central Scotland - to some extent this will be informed by work completing in June whereby Forest Research will have Indicative Habitat Networks models (IHNs) for Falkirk and for C&CVGN which can be combined with earlier research for Edinburgh and the Lothians to establish, for the first time, an IHN for central Scotland. Using other data on GIS plus some ground truthing it should be possible to map the Green Network
2. **confirmation of the extent of the CSGN** - this might be grounded on the IHN and other data but will also need to reflect the willingness of local authorities to participate.
3. **preparation of an issues paper** to inform the new Strategic and Local Development Planning process – the aim being to have the CS GN mapped within the SDPs and LDPs to inform future location of development and to identify where planned development will impact upon the realisation of the Network.
4. **consideration to produce** either a **PAN** for the CSGN or **SPG** advice to be adopted by all councils covering the green networks more generally.



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5. some **work on spatial planning** either across the central belt or in 'test' areas to test landscape and environmental carrying capacity/character in respect of delivering the CSGN in addition to other planned activity and NPF2 priorities.
6. within planning documents, a focus on **securing green gateways and green corridors** – including designation of critical sites (see attached paper prepared by CSFT last year) which we believe will be critical in securing the CSGN.
7. **identifying mechanisms** to deliver the CSGN – both existing (e.g. working with FCS to direct its land acquisition budget) to securing and delivering key sites, working with the Scottish Government's rural/environment group and the RPACs to prioritise RDC and LEADER monies, targeting developer contributions, for example from wind farm developments which are currently tending to result in a reduction in woodland cover) or setting up new funds (e.g. new Challenge Funds).

Given our experience in managing partnerships, developing and delivering strategies, track record of delivery on the ground and our capacity, CSFT would be willing to play a leading role in helping co-ordinate this activity if this was felt to be helpful and useful by the other partners.

In respect of the final content of the NPF2 doc, we would ask that the following be considered:

1. Strengthening support for the CSGN – could it become a Strategic Priority?
2. Building into the text reference to the new partnership and linking the CSGN into the Edinburgh and the Lothians Forest Habitat Network .

### **Peri-urban Landscapes**

Aligned to our interest in the above, we are also supporting work that the Scottish Landscape Forum is undertaking into peri-urban landscapes. The initial findings from this work should go out for consultation in the summer and may provide helpful context for the spatial planning activity proposed above. A focus on peri-urban landscapes would fit well with the European Landscape Convention and the importance of considering all landscapes not just those of high quality and might sit well with the CSGN work – the former might address identity, condition, character with the latter looking at land uses and benefits over the same geographic areas.

### **Strategic Priorities**

We have some specific comments on 4 of the 8 strategic priorities (numbered as NPF2) that have been identified. These follow a common theme, which is about how, if set up with the Forest in mind, each of these priorities has the potential to support the realisation of the CSF. This would require appropriate briefing of commissioning bodies to ensure Forest requirements are considered (backed by supportive Strategic and Local Development plans, planning briefs, developer contributions in kind or cash etc.):

1. Replacement of Forth Crossing – Potential to create a major Forest Gateway at the southern landing.
2. Edinburgh Airport Enhancement – Ecological development in respect of tree planting and creation of open water is heavily constrained on the basis of aircraft safety. Further airport expansion is unlikely to ease the problem. However, the Airport Authority could fund the development of an M8 Forest Gateway and could also facilitate compensatory planting elsewhere, for example in West Lothian as part of the CSF .
3. Grangemouth Freight Hub – here we are keen to ensure that development proposals are drawn up in consultation with the HELIX team to maximise any win - wins.

We also wish to highlight the potential for the Torphichen Bridge section of the A801 to be developed as a small visitor destination (to support the River Avon Heritage Trail) once the new M9/M8 connecting road is constructed.

8. Glasgow Strategic Drainage Scheme – As a greenspace delivery mechanism for North and South Lanarkshire Councils, we would hope to be heavily involved in the development of the

Green Network associated with this major drainage scheme. Again we would be keen for key sites to be developed as Forest Gateways into the CSF.

### **Detailed Comments**

In the Appendix we have identified further comment on the consultation document again highlighting areas/ activities which would further the delivery of the CSF.

### **Positive Planning 2**

Lastly, we wish to confirm that we are keen to see the planning process generally support the furtherance of the Forest. We have recently concluded a piece of work with Land Use Consultants, **Positive Planning 2**, which sets out how the National Planning Framework, Strategic and Local Development Plans, development briefs etc. can all assist in the delivery of the Forest regionally and locally. We are keen to work with the Planning Team to get this message across to the 5 Forest local authorities and neighbouring Glasgow and Edinburgh councils to ensure that the CSF sits at the heart of a connected central belt green network. A copy of **Positive Planning 2** is appended for your information and consideration.

### **Further Consultation**

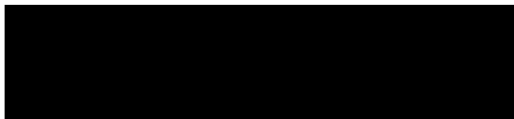
In the *Making it Happen* section, the document indicates that key stakeholders will be consulted further and that organisations responsible for taking action forward will be identified.


In this respect we are keen to be involved in:

- future debates about the development of the Glasgow and Edinburgh City Regions to inform decision-makers about the CSF and the benefits it offers to both cities
- delivery of the Central Scotland Green Network.

Should you have any queries on this response, or require any further information at this time, please do not hesitate to contact myself or my Head of Development, Sue Evans

Yours sincerely



 Simon Rennie  
Chief Executive

Enc. Appendix, Gateway Paper, PP2

## NATIONAL PLANNING FRAMEWORK 2: DISCUSSION DRAFT

### Other CSFT comments:

#### The Cities and their Regions, para 154, 250, 252

We are keen to enter into dialogue, individually and jointly, with Edinburgh and Glasgow to develop a shared understanding of the contribution (environmental, cultural and economic) the CSF can make to both cities. We believe the process of finalising NPF2 and the forthcoming development of Strategic Development plans will be critical in highlighting the potential of the CSF and the linking Central Scotland Green Network to deliver an environment worthy of a shared world class city region.

#### Sustainable Growth, paras 155 – 168

The CSF has a major part to play in the delivery of sustainable communities providing a good environment, health benefits, good access as a substitute for motorised transport and raising community pride and confidence. The Scottish Government can further its aim of sustainable development by encouraging planning authorities to adopt the guidance in our *Positive Planning 2* guidance and by supporting CSFT activity directly or through appropriately targeted mechanisms.

#### Housing, paras 169 and 172

We are keen to raise awareness of the condition of greenspace around existing housing. Frequently this is very poor, particularly around social housing, and we would encourage the Scottish Government to ensure through the planning process that, for example, as part of consent for refurbishment, consideration is given to improving greenspace so that it is fit for purpose and in respect of design, implementation and management standards.

In relation to new development, we are keen that new housing is set in connected greenspace. We believe that the forthcoming Integrated Habitat Network for the CSF should become a key decision tool for planners in establishing just where greenspace should be located (and in establishing the land take needed) in any particular development.

#### Vacant and Derelict Land, paras 178-180

We support the continuing focus on treating V&DL and the decision to look at new mechanisms to address barriers to site treatment. In recent years issues around unknown ownerships and lack of funding have hampered our efforts to green undevelopable sites in the CSF. We would be keen to share our experiences to help inform future mechanisms and tailored support.

However, whilst this land is a problem, significant areas of land which are lying unused but are not on the register. These areas can have a significant negative impact on businesses and local communities. We would welcome a focus on measures (including fiscal) which would see this land either put into 'productive' use, even if temporarily, whilst awaiting development. Such 'uses' could include allotments, biomass, biodiversity, sites for scramble bikes etc. but critically would involve engagement with local communities and active management and maintenance so that sites are clearly 'useful' and cared for.

#### Transport, paras 194 – 196, 216, 219

We would welcome closer working on transport issues that impact either positively or potentially negatively on the CSF. There are clearly opportunities to deliver integrated access points for walkers and cyclists to road and rail networks and to 'green' this infrastructure. However, "promoting higher densities" could be to the detriment of creating green corridors (which may also be needed to deliver the Central Scotland Green Network) if development is allowed to occur too close to the road or rail corridor. For example, the landscaping of the M77 as it enters Glasgow is of very high visual quality with effective use of mounding and planting. However, this continuous green corridor is now severely interrupted at Silverburn where the earth bund and planting have been removed. This is just one example of development too close to the road, but there are other generally smaller examples on the main motorways and A roads across the central belt.

Within the CSF, we would welcome the opportunity to help shape discussions around the enhancements of the A8/M8, M80 and M9 particularly. Depending on how these roads are landscaped and their corridors developed, the routes have the potential to either sever the Forest or act as access points or 'gateways' to it. We are keen to work with planning authorities and Transport

Scotland to explain our concerns and develop thinking to achieve the second of these outcomes. We would welcome the Scottish Government's support in facilitating such discussions.

Energy, Decentralised Production, paras 231-232

We support, in principle, the production of renewable energy from a range of sources. As an organisation tasked with doubling woodland cover in the CSF we are keen to see woodlands used productively both for home heating and for larger biomass production.

However, there are also conflicts and the Forest is currently losing more woodland as a result of wind farm developments than is being planted. This trend is likely to continue given the interest in industrial scale wind farm developments coming forward.

We believe there is an urgent need to review the CSF area for its renewable potential so that there can be a discussion about wind, biomass, biofuels etc to look at optimum sitings, landscape impacts and indirect impacts, for example on the ability to deliver the Central Scotland Green Network. A co-ordinated exercise would remove risk for developers, ensure mitigation could be fully co-ordinated, and enable potential benefits to be fully realised.

## **About the Central Scotland Forest Trust**

The Central Scotland Forest Trust leads and secures the creation of the Central Scotland Forest (CSF), an ambitious and imaginative project which is transforming the countryside and towns between Edinburgh and Glasgow. Through CSF-related environmental, community and economic action, the area will be fundamentally altered for the better.

The CSF is already starting to become an attractive mosaic of enhanced landscapes including new woodlands and trees, but this is only one of a range of measures by which the Forest is improving the quality of life in the area. Through the creation of a network of paths, access is being increased to greenspaces and countryside for people of all abilities and varied interests, for recreation, sustainable transport, healthy living and social inclusion. Valuable wildlife habitats are being protected, restored and expanded to maintain and increase biodiversity. Community participation, volunteering, and events help to maximise the benefits for people living and working in the area, while Forest-linked arts and culture contribute to revitalising the locality's identity and vibrancy. There is a programme of Forest education for children and young people, and practical training provides employment skills for adults, while lifelong learning increases involvement in and enjoyment of the Forest for all age groups.

Economic benefits will stem not only from the improved attractiveness of the Forest as a place in which to live, work and invest, but also from the expansion in countryside and woodland related enterprises, including sustainable recreation and wood businesses and opportunities for farm diversification.