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Craidlockhart Community Council

10/04/2008

National Planning Framework Team
The Scottish Government Planning Directorate
Victoria Quay
Leith
Edinburgh EH6 6QQ

Dear Sir/madam,

National Planning Framework 2: Discussion draft: Comments.

Many thanks for the invitation to comment on the above document and the opportunity to attend the briefing session on 07/03/2008 which was most informative.

I attach our comments on the Discussion draft and look forward to reading the revised version in due course.

Yours sincerely,

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Alan J. Dickson and S.T. Macdonald

National Planning Framework for Scotland 2

Comments on the discussion draft (January 2008) from Craiglockhart Community Council, Edinburgh.

1.0 Presentation

1.1 Para 83.

In this paragraph it states that Stern recommends that a green house gas threshold of 550ppm should not be breached. It then goes on to discuss Scottish greenhouse gas emissions in terms of MtC. The text however, does not relate the two dimensions and therefore does not make sense.

1.23 Para 127.

Some indication of current electricity demand should be inserted to put the targets and estimates in context.

2.0 Issues

2.1 Paras 87,242,243and 244.

These briefly refer to the risks of flooding and SPP7 but we believe that this risk to the economic prosperity of Scotland is greater than these paragraphs indicate. The strategic measures to be taken to mitigate the risks of widespread flooding should be given more prominence in NPF2.

2.2 Paras 73-75,137-138,233-234.

These raise the issue of waste management but in no instance specifically acknowledge that Scotland will require new, modern incineration capacity to deal with the disposal of waste such as Clinical and controlled substances which cannot be put to landfill or recycled. Such a facility will be required to provide safe and secure disposal capability and siting will be controversial. This is a national and strategic necessity and recognition of this need in NPF2 may assist in ensuring that it receives the attention it deserves.

3.0 Comments on text.

3.1

The document as a whole is somewhat confusing because topics crop up in several places. For example, Scotland Today, para 23 mentions "largest falls in population in.....and Aberdeen" but not until para 93 at Drivers for Change do we note outward migration across a tight city boundary and a consequent increase in population in Aberdeenshire.

Again, the introduction at para 5 mentions wealthier, fairer greener etc. but the definitions of these strategic objectives are in para 78 at Drivers of Change.

Redrafting should bring these matters together to make more coherent and comprehensible document.

3.2

In the Annex :National Developments - Statements of Need there is only one project which ticks the "smarter" box identifying a contribution to meeting climate change, renewable energy or waste management targets. This seems poor recognition of the strategic importance of these matters.

3.3

The commitments to the preservation of Scotland's natural heritage given in para 146 under Scotland 2030 are not clearly reflected in the section on the Creation of Sustainable Communities on page 88. Some redrafting is required to ensure that the former is recognised as critical to the latter.