



A+DS'S RESPONSE TO THE DISCUSSION DRAFT OF THE NATIONAL PLANNING FRAMEWORK FOR SCOTLAND 2

EXECUTIVE SUMMARY

A+DS welcomes the opportunity to comment on the National Planning Framework for Scotland 2 – Discussion Draft which will guide Scotland's spatial development to 2030, setting out strategic development priorities and promoting suitable sustainable growth. A+DS has previously offered enthusiastic support for the preparation of the NPF and the comments contained in this paper reflect this earlier advice, relative to the content of the Discussion Draft.

Our key points with respect to the NPF2 are:

- Under the terms of the Planning etc. (Scotland) Act 2006 the NPF has been put on a statutory footing and will naturally have a cascading effect on other planning policy documents: it is imperative, therefore, that design is given due prominence in this leading statutory document.
- The importance of good design, in helping to make Scotland a better place, is largely ignored in the Discussion Draft. This omission is worrying when one considers that the document *'will be a material consideration in determining planning applications.'* The country's main planning policy document, which will cascade policy down to other documents and plans, should highlight the importance of good design as a material consideration in the determination of planning applications.
- There is little specific mention of design quality in the paper and A+DS would contend that as design quality is a pre-requisite of any development the topic must be properly, and fully, addressed in the NPF2; both as a general point, and also in relation to projects of national significance.
- *'Economic development must be closely integrated with the promotion of environmental quality. Areas of change must be seen as opportunities to create high quality environments.'* These laudable aims from the existing National Planning Framework for Scotland should not be ignored, as it has long been recognised that quality design does offer a return on investment.
- In many European countries the importance of design quality is recognised and identified at a national level as being an essential component of the development process. On such matters it is important for Scotland to benchmark itself against other countries and to benefit from examples from abroad.
- Sustainable design and good design are synonymous. High design quality is necessary for the creation of sustainable places. Good design supports economic development and benefits the country through enhanced efficiency and productivity. A+DS recommends that the importance of high design quality should be specifically stated relative to projects of national importance.

1.0 INTRODUCTION

- 1.1 The purpose of this report is to highlight the key points arising from the Scottish Government's Discussion Paper on the National Planning Framework 2 and, in particular, to identify areas where A+DS may seek to effect change.

2.0 BACKGROUND

- 2.1 The first National Planning Framework (NPF) was published in April 2004 and set out a strategy for Scotland's development through to 2025. The second National Planning Framework for Scotland (NPF2) will act as the guide for the country's spatial development through to 2030, setting out the strategic development priorities to support the promotion of sustainable economic growth.

3.0 COMMENTS ON NPF 2

- 3.1 The vision of A+DS is of a *'well designed, sustainable built environment in Scotland of which the Nation is proud'*. Through SPP 20 (The Role of Architecture and Design Scotland) the government makes it quite clear that *'The aim is to raise the quality of new development so that high standards of layout and design are the rule, not the exception.'* The success of the planning system is measured by the quality of the development on the ground and it has long been recognised that quality design does offer a return on investment. It is contended that the NPF2 does not adequately address the importance of design issues with respect to the sustainable growth and development of the country.
- 3.2 The strategic objectives of the Government, namely: wealthier and fairer; greener; safer and stronger; smarter; and healthier are acknowledged and it is accepted that any development should seek to ensure to contribute to the well being of the country by working to these objectives. In all such cases the design of the product would be the key element. However, although design has been an important consideration in recent policy documents (e.g. Designing Places, the Development of a Policy on Architecture for Scotland, SPP 20) it barely gets a mention in this important policy document. A+DS would contend that design quality should be a pre-requisite of any development proposal and that this must be clearly stated and highlighted in NPF 2, if Scotland is genuinely seeking to successfully deliver sustainable economic growth.
- 3.3 The opportunity has not been taken to provide a Spatial Vision or to develop a National Spatial Strategy as has been done in some other European countries. For example, in the Netherlands the National Spatial Strategy states that *'To prevent an unbalanced population structure from developing, the national government is encouraging more variation in the types of housing provided. In the cities in particular, more high-quality housing options are needed. This prevents the middle-classes and the higher income groups from leaving the city. At the same time, urban renewal and restructuring are urgently required to increase the liveability of the cities.'* The same document also stresses the importance of *'preserving and strengthening the variation between city and countryside'* and *'safeguarding environmental quality'*. Research done for the Ministry of Housing, Spatial Planning and the Environment, in the VROM

Liveable Cities document, states that *'for local residents, quality of life is determined first and foremost by the quality of their homes and the appearance of the neighbourhood.'*

The importance of design quality is recognised and identified at a national level as being an essential component of the development process. On such matters it is important for Scotland to benchmark itself against other countries and to learn from examples from abroad.

- 3.4 The NPF has been put on a statutory footing through recent legislation in the Planning etc. (Scotland) Act 2006 and it should, therefore, have a cascading effect on other planning policy documents. It will be referred to in SPPs, PANs, developments plans, and appeals. In such circumstances it is essential that design is given due prominence in this leading statutory document. There is a serious danger that by failing to do so the issue of design could be left off the 'development' agenda for the next five years and this would be the very antithesis of advice received from various earlier government documents which accept that 'good design is indivisible from good planning' and that it 'is a key element in achieving sustainable development'. The overarching and aspirational aims of such policies cannot be ignored and the importance of good design must be prominently featured in NPF 2.
- 3.5 At the NPF 2 Strategy Presentations Jim MacKinnon quoted Alex Salmond as saying *'I ask every Scot to pause and reflect not on the kind of country we are – but on the kind of country we could be – we should be.'* A+DS is of the opinion that this was well defined in SPP 20 (Role of Architecture and Design Scotland) Paragraph 22 which stated that *'The aim is to raise the quality of new development, so that high standards of layout and design are the rule, not the exception. Overall, the development of well designed and attractive cities, towns and villages will support Ministers' determination to make Scotland a better place to live, work and visit.'* Regrettably, the importance of good design, in helping to make Scotland a better place, is ignored in the Discussion Draft as there is little, or no, specific reference to the issue in the paper. This omission becomes more worrying when one considers that, as stated in the document, the NPF2 *'will be a material consideration in determining planning applications.'* In other words, the main planning policy document within Scotland – which should theoretically cascade policy down to other documents and plans – fails to highlight design as a material consideration in the determination of planning applications. This sets a poor benchmark for future policy documents at national and local levels.
- 3.8 The Discussion Draft appears to be more 'economically driven' than the original NPF. The NPF2 seeks to play *'a key role in co-ordinating policies with a spatial dimension and integrating and aligning strategic investment priorities'* and in this respect its importance cannot be underplayed. However, it must be accepted that good design is an essential part of the development/investment agenda: it has long been recognised that good design contributes to making places better for people and that, in all respects, high-quality and inclusive design should be the aim of all those involved in the development process. Unless these matters are specifically highlighted in NPF2 there is a serious danger that the importance of design in the process will be ignored, resulting in a poorer quality of environment and a diminution in the overall quality of life.
- 3.9 The on-going nature of the development process requires that these policy documents are constantly reviewed and updated. In such circumstances it is

imperative that major policy issues are not diminished or, indeed, ignored completely. The current NPF pays some respect to design and high quality environmental issues and, given the increased focus on such matters over the past five years, it was felt that this importance might have been articulated in the current Discussion Draft: unfortunately, this opportunity has not been taken and design issues have largely been ignored. It is important that it is placed back on the national planning agenda through NPF2 and, consequently, through inclusion in the successor document NPF3.