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Dear National Planning Framework Team,

Response to consultation on National Planning Framework 2

The following is my personal response to the discussion paper on the National Planning Framework. I did not see a respondent information form on the website, however, I have no objection to my response and my name being made available to the public. Regrettably, I only found time for a very quick read of the discussion paper, so my apologies if any of the points raised here are already addressed within the paper itself.

Scotland-wide issues

I found the discussion paper in general extremely interesting and informative, and found many statements with which I wholeheartedly agree, such as, for example:

- the recognition of the crucial role of community involvement and ownership, and of the importance of social enterprise, in ensuring successful regeneration (paragraph 105)
- the commitment to promoting decentralist policy solutions that devolve power to the local level (para. 147)
- the intention to facilitate the development of a more dispersed and decentralised pattern of energy generation (para.s 231 and 232).

I would however find it easier to support a number of other statements if they were expanded or reworded, for example by:

- adding tele-working and other forms of virtual access and participation – and other initiatives intended to reduce the need to travel – to the very good measures intended to reduce emissions from transport already mentioned in para 117
- expressing the targets in para 233 in terms of reducing the amount of waste produced, rather than – or as well as – in terms of waste diverted from landfill
- setting out more explicit and enthusiastic support for small-scale, community-based energy in paragraph 132 – this approach would both reflect the recognition of the regenerative impacts of community-led development set out in para 105, and support the development of a more dispersed and decentralised pattern of energy generation envisaged in paragraphs 231 and 232
- including presumptions against the more intrusive forms of engineered flood protection structures and in favour of the more holistic catchment management solutions mentioned in paragraph 244.

There may be also opportunities to enhance the way in which the paper supports the Government's strategic aims; for example, the promotion of a greener Scotland would be better supported by an explicitly stated presumption against waste incinerators.

The Government's commitment to sustainable development should be supported by the use of alternative indicators to replace, or at the very least complement, the use of GDP. Given the important role that planning can play in meeting the Government Economic Strategy – the focus of which is on increasing sustainable economic growth – it would be useful for planning's contribution to Scotland's sustainable development to be assessed using an appropriate indicator, such as the Index of Sustainable Economic Welfare. A commitment to doing so could be added to para. 142.

Given the concerns raised within the paper itself about the potential negative effects of expanding the production of biofuels (para 140) and recent reports about the impacts of climate change and other factors (including the production of biofuels) on food shortages, it would be better if the Framework included a strong presumption against the production of biofuels in paragraph 162.

Highlands & Islands

There seems to be a lack of consistency and cohesion in the discussion paper when it seeks to relate the 2030 vision to specific proposals affecting the Highlands and Islands.

On the one hand, the paper reports the vastly increased population of Inverness – up by a third since the 1970s (para 45) – and sets out the challenges faced by small and medium-sized towns (para 47) and rural areas (para 48). It goes on to mention the Government's commitment to "reducing regional disparities and ensuring that growth benefits the whole of society" and to state that "a more even spread of economic activity will help to relieve pressures in high growth areas" (para 158). It advises that "many rural areas can absorb more people without losing their environmental quality, and modern communications technologies now make widely dispersed economic activity a practical proposition" (para 160) and that "new houses should generally be built in and around existing settlements" (para 173) before urging "planning authorities [...] to develop strategies for more sustainable patterns of development which take account of climate change predictions" (para 177).

And yet, even while recognising the continuing decline of other Highland areas such as Caithness (para 277) and the "need to develop models of sustainable development which are applicable to the geography and settlement pattern of the area, including the needs of island and crofting Communities" (para 270), the discussion paper is prepared to accept as inevitable the proposals put forward in the 'A96 Corridor Development Framework' (para 272). These include the creation of a new settlement at Tornagrain – to be built on farmland, some of it organic, at a time when the importance of local food production is increasingly recognised – as part of plans to accommodate an additional 30,000 people in the area between Nairn and Inverness.

The type and scale of development envisaged within the A96 'masterplan' is inconsistent with the issues and approaches set out within the National Planning Framework discussion paper and would have detrimental effects on the whole region, both within Highlands and beyond. The paper should recognise this and encourage a rethink – and appropriate levels of public involvement and consultation – on these proposals.

Many thanks for providing this opportunity to take part in this debate on the future of Scotland.

Kindest regards

Fabio Villani