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15<sup>th</sup> April 2008

Dear Sir/Madam

**Response to the National Planning Framework 2: Discussion Draft**

Forward Scotland welcomes the opportunity to contribute to the Scottish Government's consultation on its discussion draft of the second National Planning Framework. We welcome the acknowledgement of the statutory requirement on the NPF to contribute to sustainable development, and support the key aims of the strategy, which are broadly consistent with sustainable development principles.

However, it is still apparent from the document that sustainable development is dealt with by the Scottish Government as a section within the overall policy, rather than a priority thread running through every aspect of the Framework. We would urge the Scottish Government to redress this balance and ensure that every section within the document is addressed with the aim of contributing to sustainable development.

Forward Scotland is very keen to continue working with the Scottish Government and its agencies to develop a number of initiatives to further sustainable development among communities. Our experience in coordinating numerous projects and identifying new approaches to foster thriving communities will support the government's goals of achieving a greener, healthier, fairer and stronger Scotland.

Yours faithfully

## **National Planning Framework (2): Discussion Draft**

### **A CONTRIBUTION FROM FORWARD SCOTLAND**

Forward Scotland welcomes the opportunity to respond and provide feedback to the Scottish Government's discussion draft of its second National Planning Framework (NPF2). We are happy to have this response placed in the public domain, and invite questions or further discussion on any issues raised in this document.

Forward Scotland supports action for sustainable development through practical projects and research. Our mission is to champion innovative approaches to sustainable development. We work to inspire a culture where the benefits of sustainable development are understood, valued and achieved. To do this we aim to promote sustainability in the widest sense in ways that change people's perceptions, attitudes and behaviour, while also achieving economic vitality, social wellbeing and a good quality environment for all.

Our response is based on over ten years of experience promoting sustainable development in Scotland, and of managing and delivering grant schemes which have supported a significant number of communities, social enterprises and other organisations to increase capacity and improve their local environments.

#### **Scottish Government Policy and Sustainable Development**

The aim of pursuing sustainable development is a core component of the Scottish Government's planning legislation and overall priority. The Planning etc. (Scotland) Act 2006 states that, in preparing and revising the NPF:

*"Scottish Ministers must exercise those functions with the objective of contributing to sustainable development"*<sup>1</sup>.

NPF2 aims to set out strategic development priorities to support the Scottish Government's central purpose, as stated in the Scottish Budget Spending Review<sup>2</sup>, of:

*"creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth"*.

The Government defines sustainable economic growth in the Spending Review as:

*"building a dynamic and growing economy that will provide prosperity and opportunities for all, while ensuring that future generations can enjoy a better quality of life"*.

Sustainable development can be interpreted as being concerned with improving the wellbeing of people and the communities in which they live, for current and future generations. This can be achieved by integrating economic, environmental and social impacts. Through the pursuit of sustainable development, it can be expected that society will maintain or improve its levels of wellbeing in the long term.

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<sup>1</sup> Planning etc (Scotland) Act 2006, Part 1: Section 3D  
[www.opsi.gov.uk/legislation/scotland/acts2006/pdf/asp\\_20060017\\_en.pdf](http://www.opsi.gov.uk/legislation/scotland/acts2006/pdf/asp_20060017_en.pdf)

<sup>2</sup> Scottish Government (2007) Scottish Budget Spending Review  
[www.scotland.gov.uk/Publications/2007/11/13092240/0](http://www.scotland.gov.uk/Publications/2007/11/13092240/0)

## SUMMARY OF COMMENTS

Forward Scotland welcomes the acknowledgement of the statutory requirement on the NPF to contribute to sustainable development, and supports the key aims of the strategy, which are broadly consistent with sustainable development principles.

However, it is still apparent from the document that sustainable development is dealt with by the Scottish Government as a section within the overall policy, rather than a priority thread running through every aspect of the Framework. We would urge the Scottish Government to redress this balance and ensure that every section within the document is addressed with the aim of contributing to sustainable development.

Through our work on practical projects with communities and our own research, it is clear that a long-term, strategic approach is required to planning policy.

We would also stress that it is vital that developers and planners actively engage with communities as early as possible regarding potential developments. Not only will this ensure that communities are kept informed, but it is likely this will benefit developers by improving relations with communities, reduce the likelihood of opposition and may speed up the planning process.

Sustainable development is an approach that covers all policy areas, and therefore has a bearing on all aspects of planning and economic development in Scotland. This response, however, focuses only on the areas of the consultation document where there are clear opportunities for taking a more sustainable approach, resulting in improvements to Scotland's communities and places, and thus the increased wellbeing of the Scottish people. We have highlighted the sections and questions that we have responded to specifically.

## COMMENTS ON THE FRAMEWORK

As a member of the Scottish Council for Development and Industry, Forward Scotland broadly supports the response submitted by SCDI to this consultation. Although our views on the national developments differ to some degree, we wish to highlight and echo some of the key points made in SCDI's response that we support, with particular reference to the overall structure and scope of the document:

- The draft NPF2 currently exhibits insufficient clarity and vision, showing a lack of ambition and aspiration, and not enough detail on how the limited vision presented will be achieved
- NPF2 needs to make explicit reference to the other relevant strategies and plans at the appropriate points and ensure coherence across government policy
- The Framework must ensure there is an appropriate balance to development across Scotland, addressing the specific issues arising in peripheral areas, those experiencing economic fragility and social exclusion
- More detailed information on how well each of the proposed national developments fulfil the criteria outlined in the Framework would help determine whether these are the correct projects to include.

Forward Scotland is also a member of TRANSform Scotland and would like to repeat the main points outlined in its response to NPF2. In particular that the national developments proposed support unsustainable transport rather than sustainable transport. Our views on the national projects are detailed later in this response.

### **Sustainable Development and Climate Change**

We welcome the discussion within the *Drivers of Change: Sustainable Development* section on the issue of climate change, arguably the greatest challenge facing humanity and other species across the globe. However, sustainable development is an approach that encompasses all aspects of life – spanning the economy and society as well as the environment, yet this section discusses environmental and climate change issues only. This

anomaly could be redressed by re-naming this section 'Climate Change' or 'the Environment' and discussing the principles of sustainable within the introduction to Drivers of Change.

We look forward to receiving further details on the upcoming planning guidance on sustainable development due to be published this year.

### **National Developments**

Forward Scotland is concerned that the national developments proposed in the draft Framework are inconsistent with the Scottish Government's sustainable development objectives and will hamper its ability to achieve its climate change targets and objectives. Although the grid reinforcements to support renewable energy developments are key to this, some of the other proposals are likely to significantly hamper these efforts. In particular, the developments that cause most concern in this regard include:

- Replacement Forth Crossing
- Edinburgh Airport enhancement
- Glasgow Airport enhancement

Each of these three proposals is likely to increase Scotland's carbon emissions through encouraging greater demand for air and road travel. The Scottish Government must give urgent and serious consideration to how it will meet its sustainability and carbon reduction aims should these developments go ahead.

As explained by TRANSform Scotland in their response, the national priority projects do not reflect the need for modal shift to sustainable transport modes. This is in conflict with what is set out in the National Transport Strategy and a number of other government policies. The Framework does not explain how it intends to achieve its aims of promoting the use of public transport or active travel, nor ways to reduce road traffic levels.

The expansion of Edinburgh and Glasgow airports is not compatible with Scottish climate change policy. The removal of many flights between the Central Belt and London through a concentration on measures to deliver air-rail substitution would in itself remove much of the necessity for expansion of these airports in the short- to medium-term. In the longer-run, even the current levels of aviation are incompatible with requirements to reduce all carbon emissions by 80% by 2050, let alone planning for increases in the numbers of flights.

### **Internal connectivity**

In order to avoid encouraging increased commuting distances across Scotland, Forward Scotland would urge caution in focusing on reducing rail journey times between cities within Scotland. A far more valuable contribution to sustainable development would be achieved through increasing connectivity of Scotland's rural, peripheral and deprived areas, whilst contributing to the majority of the objectives outlined in the Government Economic Strategy and the key aims of the spatial strategy.

We would also suggest that the Framework should propose the long-term electrification of the rail system across Scotland (from renewable sources) as a means of reducing carbon emissions from transport.

### **Housing**

Forward Scotland responded to the Scottish Government's recent discussion document, *Firm Foundations: The Future of Housing in Scotland*. We welcomed the vision described to create sustainable, mixed communities and sustainable places and supported the assertion of generating long-term social, economic and environmental benefits through the development of "sustainable, successful settlements" by investing in quality.

Our key recommendations included the following actions for Government, which we would echo in response to the National Planning Framework:

- ensure that planning policies and guidance are closely aligned to the principles of sustainable development in order to ensure that developments managed appropriately,

with the long-term social, environmental and economic wellbeing of Scotland and its people the ultimate objective of all planning and housing policies

- ensure that developers and planners actively engage with communities as early as possible regarding potential developments, informing and empowering communities, and helping to reduce blockages in the planning process at a later stage

### **Sustainable Communities**

Forward Scotland welcomes the objective of creating sustainable communities and supports the preference stated in the document of building any new houses "in and around existing settlements, making best use of brownfield land and existing infrastructure and minimising the need for commuting". This preference should extend to all new developments, not just housing.

We wish to add that new developments should be located, where possible, in areas where the options of active travel and public transport are available, accessible and safe in order to discourage car use.

Forward Scotland broadly welcomes the proposed Scottish Sustainable Communities Initiative. We would, however, stress that it is crucial that the Scottish Government and planning authorities give sufficient consideration to who is perceived or expected to live in these communities, and how future inhabitants and neighbouring communities will be involved and engaged as part of the planning and development process.

Further clarity is required on how proposals for these Sustainable Communities will be encouraged, funded and the criteria against which they will be assessed.

### **Decentralised energy networks**

The recently published report<sup>3</sup> by the Forum for Renewable Energy Development in Scotland (FREDS) sub-group on Renewable Heat provided recommendations to Scottish Ministers on promoting the development of renewable heat in Scotland.

Forward Scotland supports these recommendations and would urge the Scottish Government to ensure that the relevant parts of the National Planning Framework are consistent with these aims. In particular, it is crucial that the Framework addresses the importance of planning for, and accommodating, district heating networks across Scotland, and the necessity for planners and planning authorities to be well-trained on sustainable development principles and how these relate to both town and spatial planning in practice.

### **Summary**

Forward Scotland supports the key aims of NPF2, which are broadly consistent with sustainable development principles. In order to realise the Scottish Government's vision, sustainable development must be placed at the heart of the Framework, with the long-term social, environmental and economic wellbeing of Scotland and its people the ultimate objective of all housing and planning policies.

Sustainable development by its very nature seeks to create the conditions whereby society can thrive. The environment will be protected and improved, the economy can grow and society will be pushed to greater equity.

Forward Scotland is very keen to continue working with the Scottish Government and its agencies to develop a number of initiatives to further sustainable development among communities. Our experience in coordinating numerous projects and identifying new approaches to foster thriving communities will support the government's goal of pursuing sustainable economic growth.

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<sup>3</sup> FREDS Renewable Heat Group (2008), Scotland's Renewable Heat Strategy: Recommendations to Scottish Ministers [www.scotland.gov.uk/Publications/2008/03/11102501/0](http://www.scotland.gov.uk/Publications/2008/03/11102501/0)

We welcome the opportunity to contribute to this consultation and we look forward to supporting the work of the Scottish Government in promoting sustainable development and wellbeing. We would be pleased to meet with you if clarification or further detail is required.