

SUBMISSION FROM DIANA CAIRNS

I wish to give my views on the National Planning Framework. I would like to preface my comments by saying that although I have been involved in several planning issues in my own community over the last few years I was unaware that consultation was taking place on the NPF. So, if someone who is engaged with planning issues is not aware of what is going on, how can people who are not engaged be expected to participate?

With reference to whether the policies set out in the NPF2 support the Government's key aims for the development of Scotland to 2030, the lack of consultation means that they do not fulfil one of the key aims of the strategy for Scotland's spatial development to 2030: to help build safer, stronger and healthier communities, by promoting improved opportunities and a better quality of life.

Community participation in the planning system is a key part of building safer and stronger communities. People have a right to influence strategic documents and plans such as the NPF, however the NPF consultation process has not enabled people to do this.

The Government's own Planning Advice Note (PAN 81 on Community Engagement, 2007) states that: "many people believe that there are barriers to engagement in the planning system, inaccessibility of documents complex procedures, lack of expertise; consultation fatigue; belief that views are not taken into account and distrust of local Government. We need to change all of this. We now have a golden opportunity to create a planning system which Scotland can be proud of - modern, efficient and above all with communities at its heart". The consultation on the NPF has not lived up to this aspiration.

The Building Alternatives report "Critique of the National Planning Framework 2 Consultation Process, An independent evaluation from a community perspective" has found that the Government has not consulted the people of Scotland properly on the NPF because the Government, although it carried out a number of events and a written consultation, did not do the following: specifically consult people who will be affected by the developments; consult people in a way that they could understand both the implications of the NPF and the developments and policies contained in it; consult people at a time and place suitable to them (for example all of the events were held during working hours); reach out to people who are not normally involved in planning issues; have an effective way of informing the people of Scotland about what was happening.

The report also concluded that the consultation was not really a consultation, but more of an information giving process.

My own experience of consultation under the new Planning Act, although it was not on NPF-type developments, is that it is seen as a box-ticking exercise by developers. For example, a waste management company applied to build a massive waste transfer station in Portobello, Edinburgh, where I live. They held a pre-application exhibition for local residents at which residents were asked to complete a post card saying whether they were for or against the development. In the community consultation document the company produced as a result of this exercise, they reproduced 19 comments from the public, four of which were broadly in favour of the development, giving the impression that around 25% of local residents backed the scheme. However, there were over 700 letters of objection written by the public, not one of which was in favour of the development. The company also promised to keep residents informed of progress via a newsletter in the months leading up to the determination of the application and promised to circulate a video showing a similar installation to the one they proposed in Portobello. They did not fulfil either of these promises and as a consequence local residents had no trust in the claims the company made about how they would mitigate the worst effects of the development.

A housing developer's architects recently made a pre-application presentation to our local community council and they wrote a summary of the discussion which took place following the presentation and wanted to circulate their account (which gave the impression of a more favourable response by the community council than that which actually occurred) to the community council members. Their account did not concur with the community council's account of the discussion, which it was felt was largely unfavourable towards the development, so the request was declined.

I give these examples as illustrations of how some developers may pay lip-service to the community's opinions about developments and how communities will have to be vigilant to make sure that the consultation process is not manipulated for developers' own ends. Not all communities are equipped to do this and this concern will need to be addressed, either by using independent community consultation experts to oversee consultations or by providing more resources to local authorities to carry out this role.

I would ask that the committee looks at the Critique of the National Planning Framework (NPF) Consultation Process report on the way the consultation was carried out and see the evidence that it has not addressed these key barriers to community engagement. There should be a halt to the progress of the NPF until the concerns over the consultation process have been resolved.

I would also like to comment on whether the proposals listed as potential national developments meet the criteria set out by Ministers in a statement to Parliament on 13 September 2007.

My concern with these criteria and the deemed suitability of NPF projects is that they are subject to change according to which political party is in power. For example, the SNP government will not identify any nuclear power stations as being required national developments but if a Labour government came into power, it undoubtedly would. The NPF should be more robust than this and the only way to ensure this is to include the concept of need in the NPF so that projects can be assessed objectively, rather than according to the political flavour of the month.

I hope you find my comments of use.

Diana Cairns