

SUBMISSION FROM MATILDA GIFFORD

I am writing to you out of concern for the national Planning Framework (NPF2) and its implications.

The NPF2 is being seen through its final phases: evidence must be submitted by January 13th 2009. As I'm sure you know, the NPF is a decisive planning document, outlining all the major development projects in Scotland until 2030.

A number of projects prescribed by the NPF are directly opposed to Scottish national interest in terms of economics, environment, and democratic credibility. In economic terms, projects from the NPF are incompatible with Scottish government's policy to "promote sustainable economic growth". More seriously, many of them openly contradict the Scottish Climate Change Bill: locking Scotland into decades of carbon-intensive infrastructure. In addition, not only are the outcomes of the NPF cause for concern, but the consultation process itself was massively insufficient.

I am using the case study of the aviation industry, though a number of other developments – be they coal or road related – can illustrate similar points. The development of Glasgow and Edinburgh airports are prescribed in the NPF2 as 'national developments'.

1) NPF and Economics

The government's own first criteria for the NPF is that the project "must make a significant contribution to Scotland's sustainable economic development". An economic report, recently launched in Parliament, demonstrates that the expansion of Glasgow Airport as planned, will incur an annual deficit of £1.3 billion per annum (Gerry McCartney, 'The economics of airport expansion: a briefing paper on the economic case for the Glasgow Airport Master Plan'). The heaviest argument advanced by government and BAA, that airport expansion is essential for economic reasons, has now been exposed as an economic fallacy.

2) NPF and Climate Change

The NPF is pivotal in determining Scotland's position on Climate Change. The Climate Change Bill calls for 80% cuts by 2050. If aviation expansion continues as projected, aviation alone will take up the entire carbon budget for the whole of Scotland, within the next few decades (Tyndall Centre for Research).

Not only the Climate Bill, but the NPF's own demands are being disregarded. Criteria 4 states: "[the projects] must make a significant contribution to the achievement of climate change, renewable energy or waste management targets". Airport expansion is one of the priority projects in the NPF, with projections to triple the capacity at Glasgow and Edinburgh.

Aviation is the fastest growing source of Greenhouse Gasses accounting for 13% of the UK's climate impact (government figures).

The Government asks the question, "What do we want Scotland to be by 2030?". All the Climate science (from IPCC, Tyndall Centre) is clear about what we need to do. Between now and 2030 is a critical window of opportunity of about a decade – the NPF must reflect that.

3) THE NPF's consultation

In the areas most impacted by the current airports, enduring the current noise impacts of living under the flight path – a massive majority of the community were not even made aware of expansion plans – let alone consulted.

The consultation process – as outlined by government's criteria PAN 81 – has been a sham. Evidence from the communities around the airports is being gathered to make this point. Clare Symonds has written a report ("Critique of the National Planning Framework 2 Consultation Process. An independent evaluation from a community perspective"), spelling out the government's failure to consult the Scottish public.

The democratic credibility of the NPF jeopardises the integrity of the Scottish government. The inherent contradictions of the Scottish government – with drafts of the NPF and the Climate Change Bill which simply cannot add up – could also undermine the Scottish government's credibility.

We call for the postponement of the NPF process until the consultation criteria have been fulfilled. We also call government to look at the economic evidence, the climate science and to re-examine the NPF to create a coherent development plan for Scotland which is both equitable and sustainable.

Please let me know your intended position on this issue. If you can recommend further activity to postpone and re-shape the NPF please do not hesitate to be in touch.

Matilda Gifford