

SUBMISSION FROM PLANNING AID FOR SCOTLAND

Planning Aid for Scotland – Who We Are

Planning Aid for Scotland (PAS) is a company and a charity registered in Scotland which provides services to people seeking to engage more effectively in the planning system and related activities which affect the environments of local communities. It is funded by the Scottish Government, charities, members and sponsors and provides advice and training through its small complement of staff and over 180 volunteers from the membership of the planning profession in Scotland.

PAS believes in a plan led system which gives clear direction to developers and communities and takes an active interest in improving the way that planning serves local communities, national interest groups, minority and hard to reach groups, as well as any member of the public who would benefit from understanding and participating better in how plans and planning policies are adopted and planning decisions on individual cases made. We are especially interested in law, procedure and good practice techniques for informing, consulting and involving all groups of society in a transparent and equitable way.

Comments on NPF2

Consultation on NPF2

The National Planning Framework 2 (NPF2) sets out a long-term vision to guide Scotland's development and support sustainable economic growth. NPF2 will become a significant component of the planning system in Scotland that will inform development plans and affect decisions at a local level.

PAS is aware that widespread engagement with the general public in strategic and long-term planning issues such as those provided in NPF2 can be difficult to achieve given the perceived complexity of the planning system and a difficulty to envisage changes which are to occur over a long period of time and over a wide geographical area.

PAS is of the opinion that the strategic nature of NPF2 has resulted in the document which is relatively inaccessible for many people. However, this in itself should not be seen as a fault with NPF2. Instead, it represents the challenge faced by the government, PAS and all other parties concerned with improving access and participation in the Scottish planning system. It is hoped that the Planning etc. (Scotland) Act 2006 will lay the foundations for creating and improving awareness and involvement of the public.

PAS has examined the Participation Statements that have been prepared at regular intervals to update stakeholders and the general public on the progress of NPF2. They show that the methods used to raise awareness and seek comments have been wide-ranging and have incorporated a variety of

consultation methods including targeted engagement, a website, a helpline, seminars, events and leaflets. We also wish to commend the efforts made to engage harder-to-reach and diverse sections of society in the discussion of the overall vision.

PAS believes that the value of Participation Statements as a method to provide information and evidence on the inclusivity of a consultation process is demonstrated by their use in NPF2. Furthermore, the Participation Statements have shown that engagement in NPF2 negates the presumption that little effort has been made to consult with the general public.

PAS was pleased to see that the Government adopted the principles of Planning Advice Note 81 (Community Engagement) and the National Standards on Community Engagement in the preparation of NPF2.

National Developments

The following statement contained within the Annex of NPF2 is of particular relevance to PAS:

“Developments designated as national developments will still require to secure planning permission and other relevant consents, but Ministers may intervene at any stage of the process to ensure that decisions are made expeditiously. Designation in the National Planning Framework is the mechanism for establishing the need for these developments. Any subsequent examination of the detailed planning implications, whether by a session of a public inquiry or a hearing, will therefore be concerned with matters such as siting, design and the mitigation of environmental impacts, not the principle of the development”.

It may well be seen by many that the establishment of need for the 12 National Developments contained in NPF2 is effectively a back door approach to in-principle consent that will avoid exposure to legitimate public scrutiny. We believe that the inability to challenge the need of the National Developments is something that the general public may find difficult to comprehend. It is felt that there is a risk this could lead to a feeling of being unable to influence the planning decisions resulting in increased disengagement and lack of confidence in a planning system which operates in the public interest. PAS envisages that it will have an important role to inform the public of how National Developments will progress through the planning system.

It is therefore essential that the general public is made fully aware of the Strategic Environmental Process that the National Developments have gone through prior to their inclusion in NPF2. It is also essential that they are fully aware that they will have the opportunity to comment on national developments during the planning application and environmental impact assessment process.

Notwithstanding the above, PAS is of the opinion that concerns surrounding the establishment of need for the National Developments contained within NPF2 will be first real test of public confidence in the new plan led system.