

SUBMISSION FROM THE ROYAL TOWN PLANNING INSTITUTE IN SCOTLAND

The RTPI is the UK body chartered to represent the planning profession. It has approximately 2100 members in Scotland, working across all sectors of central government, local government, government agencies, the voluntary sector, private consultancy, the development industry and academia. Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.

Our views on the issues raised in your consultation paper are set out in the annex to this letter. These comments have been drawn together by the RTPI in Scotland Task Group on the National Planning Framework. The Institute was represented on the Scottish Government's Advisory Group on the National Planning Framework and our previous responses to consultations on this topic are available on our website.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way.

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National Director

Submission by the Royal Town Planning Institute in Scotland on the National Planning Framework

Introduction

1. This submission from the Royal Town Planning Institute in Scotland is provided in response to the Local Government and Communities Committee's request for views on the proposed National Planning Framework 2. These comments have been drawn together by the RTPI in Scotland Task Group on the National Planning Framework.
2. In general, the Institute warmly welcomes the draft NPF2 which we consider provides a good basis for detailed development of a coherent spatial planning strategy for Scotland. The strategy builds on the success of NPF1 and whilst it continues to reinforce existing strategies, we believe that the action programme has the potential to develop into a vital document to drive change and influence development.
3. Whilst the Institute agrees with the production of a short and clearly focused final document, we would recommend that supporting survey and analytical materials should be easily available via the website. A summary review of the previous NPF might be included. In time, a more forward looking document would be achieved by a longer strategic horizon, addressing climate change, mitigation measures, and the steps needed to move towards a carbon neutral economy. In the longer term, and before NPF3 it would be useful to consider ways in which carbon proofing of plans including the NPF might be addressed. We also now need to provide clear links with the Scottish and UK marine strategies and to begin a programme of preparation, action and related research to assist with monitoring and evaluation and to explore emerging issues.

Whether the policies set out in the NPF2 support the Government's key aims for the development of Scotland to 2030

4. The Scottish Government's strategic purpose 'to focus government and public services on creating a more successful country with opportunities for all of Scotland to flourish, through increasing sustainable economic growth,' and its four strategic objectives of wealthier and fairer; healthier; safer and stronger; and greener, are supported to varying degree by the policies set out in the NPF2.
5. The full potential of the NPF in representing the spatial implications and interaction of government policy areas needs to be recognised. The NPF has an important role in co-ordinating the spatial dimensions of key national policies such as responding to climate change, renewable energy, settlement strategies, transport, green infrastructure and waste disposal. The relationship between NPF 2 and the future form and content of Scottish Planning Policy and their combined effect on strategic and local plans has yet to be clarified and worked out in practice.
6. In this context, NPF2 has an authoritative role in providing a corporate view from SE Directorates of long term policies and priorities; in indicating how key issues manifest themselves in spatial terms; in providing the framework for further development of policy through strategic and local development plans. The Institute recommends that other Government Directorates and public agencies should be encouraged to sign up to NPF policies and proposals.
7. It is particularly important that there should be synergy between the NPF and other key Government policy documents in particular the Climate Change Bill, the Economic Strategy, the Rural Development Plan and the details of the Strategic Transport Projects

Review. In turn, synergy will be required with strategic and local plan policies and proposals. This may be particularly relevant to proposals for airport enhancement and the need to consider aviation passenger forecasts in the light of sustainable development and climate change policies.

8. In response to climate change, the Institute notes the need for strategic approaches to flooding and to coastal issues particularly in view of the current discussion on approaches to the Marine Bill and the Flooding Bill.
9. The Institute would support the development of territorial development indicators to include measures of health; deprivation; employment change etc as a basis for monitoring and measuring change.

Whether the correct balance has been struck between economic development and environmental protection

10. Scottish Ministers are tasked with preparing and revising the National Planning Framework with the objective of contributing to sustainable development. Regard may be had to any guidance issued. We believe such guidance should build on the framework of sustainable development established by the Scottish Sustainable Development Strategy '*Choosing Our Future*' and with reference to the five principles of living within environmental limit, ensuring a strong, healthy and just society, achieving a sustainable economy, promoting good governance, and using sound science responsibly. Issues of sustainable development are therefore wider than just economic development and environmental protection. These should not necessarily be in conflict as environmental quality can be seen as an important driver of economic development.
11. Within NPF2, social and environmental protection objectives are clearly stated as important elements of the spatial strategy, however, mechanisms to deliver environmental enhancement are imprecise and limited when compared with economic development proposals. The Institute supports the policy emphasis given to strengthening green infrastructure, regeneration, housing and sustainable communities. We think that an integrated approach to economic development and environmental protection objectives will be required. A new sustainable communities programme should be delivered through the development plan process and should grow out of the housing, economic development and regeneration agendas.
12. The approach to environmental conservation within NPF2 needs to build on the work done in NPF1 and to recognise new policy developments. This includes policies on landscape, historic environments, culture and distinctiveness of place and the growing demand for better design and quality of environments particularly in small towns and across the central belt.
13. As noted in NPF 2, commitment to the European Landscape Convention should assist in achieving a more holistic approach to landscape issues and 'ownership' of landscape policy across all sectors. Whilst many of these concerns are more appropriately dealt with through SPP and development plan policies, it will be important for the NPF to illuminate the critical role they play in contributing to sustainable development objectives. How this might be achieved through the Action Programme, strategic and local plans will require further consideration. The development of new environmental capital such as a Central Scotland Green Network is supported but greater emphasis might be given to the development of national ecological networks including longer distance trails and green infrastructure around towns; and to a strategy for managing coastal environments. Such landscape scale approaches to ecosystem management will require national leadership.

14. In addressing sustainable development, NPF2 is also concerned with issues of deprivation and poverty in Scotland. This should provide the framework for closer integration through community planning partnerships and single outcome agreements in addressing issues of quality of life, distributional access to resources such as greenspace, poor housing, lack of acceptable building design and service provision in rural areas.

Whether the proposals listed as potential national developments meet the criteria set out by Ministers in a statement to Parliament on 13th September 2007

15. The Institute considers that the national developments identified in the NPF are generally pragmatic choices, which in the main, will be implemented early in the plan period. Transport proposals will have been costed through the Strategic Transport Projects Review. However, other proposals in particular relating to energy provision involve matters of technological risk and uncertainty; might have involved the testing of other alternatives including centralised versus distributed provision; and need to be tested against climate change objectives of the reduction of emissions and a move towards a carbon neutral economy.
16. While many of the national developments are of strategic significance and could be expected to deliver economic benefits, there is not a complete alignment with the Government's stated aims on climate change. Some projects could lead to significant increases in emissions and it will be important that they do not make achievement of these reductions more difficult. The challenge will be to design projects to minimise carbon impact, and to mitigate impact of emissions.
17. Details of funding of programmes and regular monitoring and reporting will be required. The action programme should be a live document and should provide more detailed costings and stakeholder involvement. Early involvement will facilitate delivery through strategic and local development plans.

The key priorities for regional development set out in the spatial perspectives section.

18. In future, the NPF will be the only document where strategic information for areas outwith the city regions will be readily available. It will be important to retain the synergy which existed in the preparation of NPF2 for these areas to make effective links between planning levels.
19. As noted in the NPF, there is a particular need for closer links with the Rural Development Plan and a clear read-across to the work of the Regional Project Assessment Committees. The links with the River Basin Management Plans might also be further developed in NPF3.

The potential impact on local authority development planning and development management

20. NPF 2 has raised the profile of planning and provides an important statement of the value of spatial planning at the national level. NPF 2 is welcomed as a valuable framework and context for development plans.
21. The potential impact on development management is less clear. This is particularly true in relation to National Developments where more clarity will be needed on the nature of projects, more information will be required on the components of the action programme and the resources required. In addition greater clarity on the process and on the interface with other delivery mechanisms will be necessary together with the commitment from other agencies. This should be achieved through the expansion of the section on 'Making it Happen' and by drawing partner agencies into the process.

Any financial implications for local authority planning departments

22. Implementation of the Action Programme will require appropriate commitment, resources, and skills. It is likely that local authorities will have a significant role to play in implementing the spatial priorities for Scotland, however, at this stage specific costs cannot be quantified.
23. The Institute is concerned about the funding of spatial planning in local government, particularly at this time when there is a significant loss of planning fee income. There is a need to raise the status of planning within local government, to recognise the importance of the new development plan led system and to address issues of the recruiting and retaining skilled and experienced staff. The Institute is taking active steps with the SSDP, Scottish Government and the Improvement Service to address these issues.

Looking ahead to NPF3

24. The completion of NPF2 and the production of a spatial strategy for Scotland is a major achievement. This should be seen as the beginning of a dialogue amongst stakeholders, with active engagement through the action programmes going forward, efficient evolution of process, and transparent and careful monitoring to provide an informed evidence base for NPF 3.

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