

SUBMISSION FROM SCOTTISH EDUCATION AND ACTION FOR DEVELOPMENT

This response to the NPF2 consultation process, has been compiled by SEAD (Scottish Education and Action for Development)
12th January 2009.

An answer to the consultation questions

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

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

National Planning Framework 2 (NPF2) consultation process.

SEAD was not asked to give evidence on this consultation and has not been included in previous consultations on the NPF. We were concerned when we learned that the Local Government and Communities Committee had launched the call for evidence for NPF2 on the 12th December 2008, with little or no announcement to communities and groups. The NPF has a direct concern to communities living next to proposed developments and we feel that their involvement within this and previous consultations and developments concerning the NPF are of great importance. We therefore feel that this consultation process is not fair and directly excludes communities from having a say.

What is even more worrying is that this is the second stage of the NPF and consultations with communities and concerned groups were equally as sparse. We therefore want to bring your attention to two investigations

1) Research and a report published on the NPF process, a report called 'A Critique of the National Planning Framework (NPF) Consultation Process' (www.planningdemocracy.org.uk/NPFreport.pdf). The report has been endorsed by a number of organizations including the RSPB, John Muir Trust, Friends of the Earth Scotland and the Association for the Protection of Rural Scotland. As we are drawing your attention to this report we are endorsing the report also.

The report finds that the government has not consulted the people of Scotland properly on the NPF. The reason claimed is that 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

In effect the NPF consultation was not really a consultation, but more of an information giving process.

2) Since the 17th of December we carried out a survey on a small amount of communities (11 participants due to the short time scales of the consultation process - 4 weeks and over the Christmas break) if they have heard of the NPF2, were aware of the consultation, wanted to be consulted and felt that they were entitled to be consulted. You can see for the results that these responses are disturbingly similar to results in the report mentioned above, for the NPFs consultation from February 2007 to April 2008 as the survey questions and results shown below (based on numbers of answers yes and no 11 respondents)

1) Are you aware of the National Planning Framework 2 that is currently under consideration at the parliament? **2Y/9N**

2) Have you been consulted during the NPF consultation process? **11N/0Y**

3) Do you want to be consulted and feel you are entitled to be consulted in the NPF 2? **0N/11Y**

4) Do you want to be kept informed with the NPF 2 and its future developments? **N/11Y**

Final conclusion to the questions

The new planning Act (2006) states that the Government has to write a statement of participation saying how they will consult people. Before the NPF can be approved they have to prove that they have fulfilled this statement. SEAD believes that the government has failed in this commitment. The NPF consultation was the first and most critical test, but has revealed major problems with the effectiveness of the Government approach to consultation.

The lack of consultation means that the government has not fulfilled 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.

Furthermore, the Government's own guidance which 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' (PAN 81 on Community Engagement 2007)

On these grounds and for the importance of the document to communities, we strongly advise the The Local Government and Communities Committee to demand a proper, fair, democratic and just consultation on the NPF . We demand that this consultation be stopped and a proper process and time scales be created so that communities voices can be heard.

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SEAD