

**RTPI**

mediation of space · making of place

The Royal Town Planning Institute in Scotland
57 Melville Street
Edinburgh
EH3 7HL

Tel: 0131 226 1959

Fax: 0131 226 1909

www.scotland.rtpi.org.uk

Registered Charity No: 262865

Email to: Debbie.Nicol@scotland.gsi.gov.uk

Ms Debbie Nicol
API Division
Scottish Executive
Area 2F North
Victoria Quay
Edinburgh
EH6 6QQ

16 August 2006

Dear Ms Nicol

Review of Scottish Ports Policy

The Royal Town Planning Institute (RTPI) is grateful for the opportunity to respond to this consultation, which addresses devolved port matters and the development of Scotland's ports as an integral part of Scotland's National Transport Strategy.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and policy neutral professional body committed to supporting devolved government in Scotland. The Institute has 1900 members in Scotland. 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.

The Institute has championed the case for effective spatial planning both on land and in the marine environment through its work with the Scottish Executive which has led to the National Planning Framework and through its current lead role on Marine Spatial Planning with the Advisory Group on Marine and Coastal Strategy. The key to this is recognition of the added value which spatial planning can bring to integrated public policy making without necessarily confining the discipline to the scope of the statutory planning system. We believe that these principles are vitally important to the development of a Ports Policy where a perspective which straddles terrestrial and marine spatial issues is essential.

The Institute does not wish to comment on all issues raised in the consultation. However, we hope that the following brief comments will be of assistance to you in taking forward this work. Our comments on the consultation questions are set out below under the relevant questions posed in the consultation paper. You are also referred to the RTPI's response to the UK Department of Transport's Ports Policy Review, which will be made available via our website at <http://www.rtpi.org.uk/resources/policy-statements/2006/toc.html>

Current policy framework as set out in 'Modern Ports, a UK Policy'

The Institute agrees with the proposal to review the framework as set out in 'Modern Ports, a UK Policy' to ensure that it remains fit for purpose. We consider that the revised policy framework should give greater emphasis to emerging policies in relation to marine spatial planning; coastal zone management; and sustainable transport policies for Scotland as set out in the Sustainable Development Strategy and the National Transport Strategy. The Institute considers that in addition to closer links with the National Transport Strategy, links should also be strengthened with the National Planning Framework, which in the future will be the key government policy document to guide the spatial development of Scotland, including the offshore area.

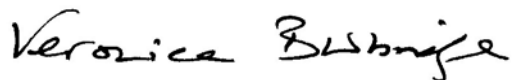
One issue specific to Scotland will be the requirement to undertake a Strategic Environmental Assessment of any Scottish Ports Policy. Further consideration will be needed on how this should be approached given the relations between reserved and devolved policy areas; and to how the assessment might provide a framework for lower tier plans and programmes.

Planning

As noted above, the Institute considers that it is essential for the Ports Policy in Scotland to be closely linked to the National Planning Framework. Ports policy also needs to be influenced by and to be reflected in a number of Scottish Planning Policies such as SPP17 Planning for Transport, SPP 2 Economic Development; and NPPG 13 Coastal Planning. A high degree of co-ordination is also needed at strategic and local plan levels and further guidance on the implications of the current changes set out in the Planning etc. (Scotland) Bill for ports developments will be required.

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. Should you wish any clarification please do not hesitate to contact me at the RTPI Scotland, Edinburgh office: 57 Melville Street, Edinburgh, EH3 7HL phone: 0131 226 1959, email: veronica.burbridge@rtpi.org.uk

Yours sincerely



Veronica Burbridge

Scottish Planning Policy Officer
The Royal Town Planning Institute in Scotland