



**RTPI**

mediation of space · making of place

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Registered Charity No: 262865

Charity Registered in Scotland: SCO37841

31 August 2007

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Dr Graeme Purves  
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Dear Graeme

**NPF Strategic Environmental Assessment: assessment of strategic alternatives**

Many thanks for meeting with the RTPI in Scotland's Task Group on the National Planning Framework earlier this month and for the opportunity to comment on the Stage1: Assessment of Strategic Alternatives Discussion Paper. The paper has been considered by members of the Task Group and we would like to offer a few comments in response to the points raised. Many of these issues have been covered in our discussions with you and in our previous consultation responses. I hope that the following highlighted points will be of assistance. I will forward a note of our last meeting to you separately.

**Biodiversity**

The Institute supports the inclusion of strategic green network enhancement in the NPF. This has a number of climate change advantages, including those for biodiversity, and also addresses issues of sustainable flood management, carbon sinks, landscape restoration and human population health and quality of life. One area where such an initiative might be targeted is the continued work on the Central Scotland Forest. Water environments should also be considered and continuing support for the Firths Initiatives and coastal habitats should also be considered.

The Institute considers that links between biodiversity initiatives and the more economically and amenity-driven agenda are important at all levels. A high level statement within the NPF should

provide the framework for connections to be made through the Scottish Biodiversity Strategy and its implementation plans. Whilst national level commitment to biodiversity enhancement is important, the Institute agrees that action at a more local level, cascading from SPP14 through strategic and local development plans, and supported by local biodiversity action plans will also be necessary.

## **Health**

The NPF should aim to raise awareness of strategic environmental health issues and point to any apparent spatial dimensions of health inequalities and environmental justice. More research and wider dissemination of information on relations between health and environmental factors are needed. These issues should be developed further through the SPP series and development plans.

## **Population**

The Institute agrees that the NPF should have a role in identifying long-term regeneration areas.

## **Sustainable Settlements**

The Institute considers that sustainable settlements are largely a development plan issue, however, sustainable expansion does require infrastructure funding which is a national level issue and therefore policy frameworks are required at both levels.

## **Energy consumption and CO<sub>2</sub> emissions**

The Institute considers that the NPF should address this key issue through strategic locational decisions, and through grid capacity and connectivity proposals.

The NPF should aim to address the mitigation of climate change, particularly in relation to flooding and estuaries and in relation to carbon footprints in urban areas. However, it is important to recognise the contribution to be made through spatial planning as opposed to other mechanisms e.g. in relation to building fabric. The NPF should perform an important role in providing a national policy context, which can lead to local action.

## **Water**

The Institute agrees that the relationships and priorities in future River Basin Management Plans should be considered within the NPF, however, these are currently at an early stage of development.

## **Soil**

In view of the forthcoming EU Soils Directive, and the important role that soils play as a platform for development, in food and fibre production, in providing a medium for biodiversity, and in offsetting the causes and consequences of climate change, the NPF should recognise the strategic significance of protecting soil functionality through development planning and land management.

## **Efficient use of land and resources**

The Institute agrees that the NPF should make strategic provisions for carbon sequestration. We support the inclusion of consideration of the effects of spatial approaches to waste management facilities.

## **Cultural heritage**

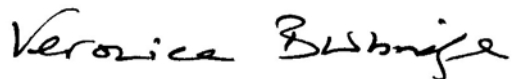
The Institute agrees that the NPF has a role in supporting the protection of designated and non-designated cultural heritage resources. We consider that the policy implications should be explored further through SPPs including the new SPP14 and any revised NPPG5 and NPPG18. Climate change issues might also be considered at this level and consideration might be given to a separate SPP on Climate Change.

## **Landscape**

The NPF has an important role to play in providing the spatial framework for the protection, enhancement and planning and management of Scotland's landscapes. This should provide an holistic approach and reflect the need to development a national landscape policy in response to the European Landscape Convention. Whilst the NPF should reinforce accepted landscape protection measures, new approaches based on landscape characterisation and local distinctiveness are required and will require policy support.

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](mailto:veronica.burbridge@rtpi.org.uk)

Yours sincerely

A handwritten signature in black ink that reads "Veronica Burbridge". The signature is written in a cursive, slightly slanted style.

Veronica Burbridge

National Director  
The Royal Town Planning Institute in Scotland