



**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](http://www.scotland.rtpi.org.uk)

Registered Charity No: 262865

Scottish Charity Registration Number SC 037841

Email: [NPFTeam@scotland.gsi.gov.uk](mailto:NPFTeam@scotland.gsi.gov.uk)

Dr Graeme Purves  
Assistant Chief Planner  
Built Environment Directorate  
Scottish Government  
Victoria Quay  
Edinburgh  
EH6 6QQ

10<sup>th</sup> April 2008

Dear Graeme

## **NATIONAL PLANNING FRAMEWORK FOR SCOTLAND 2 DISCUSSION DRAFT**

The RTPI is grateful for the opportunity to respond to this consultation which addresses a key element in the modernising planning system. The Institute is represented on the NPF Advisory Group and has had many opportunities to contribute to the on-going debate on the NPF. We are grateful to the Scottish Government for the open and inclusive manner in which it has developed the National Planning Framework; we would like to congratulate the members of the NPF team on their approach to consultation, awareness raising and consensus building.

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 approximately 2000 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.

The Institute's response to the consultation, which is set out below, has been led by its Task Group on the National Planning Framework.

## General comments

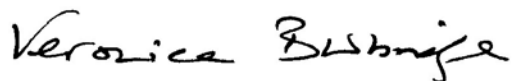
The Institute agrees with the Scottish Government's intention to produce a short and clearly focused final document with supporting material easily available via the website in separate documents. As the document will be substantially changed in its final version, our response addresses the more general questions of principle and builds on our earlier responses. Our detailed points are set out in the attached Annex under the questions addressed at the recent discussion events.

In general, the Institute welcomes the draft NPF2 which we consider provides a good basis for discussion and 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 consider that the action programme has the potential to develop into a prescriptive and 'live' document to drive change and influence development.

A shorter document will allow for the removal of some repetition and for key messages to be brought out more clearly. However, it will be important to ensure that all key messages from the initial sections are incorporated into the final strategy. The Institute considers that paragraph 141 on page 43 provides a strong statement of aims and objectives and might be used as an introduction to the document. The document might then be arranged around these themes.

The Institute trusts that these comments are of assistance and has no objection to them 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



Veronica Burbridge

National Director  
The Royal Town Planning Institute in Scotland

## Annex 1

### Detailed comments by the Royal Town Planning Institute in Scotland on the National Planning Framework for Scotland 2: discussion draft

#### How can the NPF2 be strengthened?

1. The Institute considers that the NPF2 might be strengthened by a longer term perspective which: gives recognition to the urgency of tackling climate change and the primacy of policies and national developments in addressing climate change issues; provides strong links with the Climate Change Bill; considers the carbon proofing of future plans; and emphasises stronger links with the strategic priorities of 'well-being; quality of place and equity of opportunity as set out in the Scottish Government's economic strategy.
2. The Institute agrees that connectivity should remain an overriding principle of concern for the NPF. We would like to see further consideration of external linkages both in terms of Scotland's peripherality within Europe but also with regard to wider international relations.
3. More might be made of the section on the sub-national spatial perspectives, particularly outwith the city regions. In future, this would be the only document where strategic information on these areas would be readily available; it will be important to build on strengths and to recognise differences; to address issues of quality of environments and to address these within national 'programmes' which could be part of the action programme.
4. Questions of how to address continuing pressure in Edinburgh versus continuing environmental degradation, poverty and health issues in the west of Scotland suggested that there is a need to consider the degree of 'common economic space' across the two conurbations, and the basis of national policy with regard to growth poles or regional development principles. This would be in line with the priority given in the Scottish Government's Economic Strategy to achieving balanced growth across Scotland and giving all across Scotland the chance to succeed.
5. The Institute would support the development of some kind of a territorial development index to include measures linked to social indicators of health; deprivation; employment change etc as a basis for monitoring and measuring change in terms of the economic strategy targets of solidarity, cohesion and sustainability.
6. Care will be needed to ensure that all the key messages from the first section of the current draft are incorporated into the strategy. For instance it will be important that the softer aspects of environment and quality of place are maintained. NPF2 needs to continue to recognise the importance of 'green infrastructure,' landscape and Scottish cultural and historic roots in the encouragement of sustainable place making. The NPF should also reflect the new agenda for the National Waste Plan and emphasis on recycling.

#### Have we got the list of National Developments right?

7. The Institute considers that the nine developments identified in the draft are acceptable and pragmatic choices. They represent developments to which commitment already exists and all will be implemented by 2014. Further thought should be given to the preliminary identification of longer term 'developments to be implemented by 2030 and to those that might emerge more directly out of the climate change agenda. Such projects could include: development of high speed trains between Glasgow and Edinburgh and between these two cities, London and the rest of Europe and the development of the Glasgow rail cross link, to increase national connectivity.

### **How can NPF2 be more aspirational?**

8. A more aspirational document would be achieved by a longer strategic horizon, addressing the geography of Scotland in twenty-five to thirty years time, and addressing climate change, appropriate mitigation measures, and the need to move towards a carbon neutral economy. In the longer term, and before NPF3 it would be useful to consider ways in which the carbon proofing of plans including the NPF might be addressed; and how the NPF might set the context for the marine energy strategy.
9. In response to climate change issues, the Institute notes the need for strategic approaches to flooding and to coastal issues. The current document identifies areas for marine energy potential; it is suggested that these need to be incorporated into an integrated strategy for the coast particularly in view of climate change issues and the current discussion on approaches to the Marine Bill and the Flooding Bill.
10. It is also suggested that a programme of related research might be initiated. Such a supporting programme might address issues and topics likely to be included in subsequent plans and assist with monitoring and evaluation.

### **How detailed should the Action Programme be?**

11. The Institute considers that the action programme should be a live document; it will require more detailed costings, details of funding of programmes and should be monitored and reported on regularly. We consider that the delivery of 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. The encouragement of local employment opportunities and the provision of infrastructure and transport will be key elements in achieving such a strategy and will require local integration. It is also suggested that housing targets will need to be expressed regionally.
12. In addressing the implementation of the Action Programme it might be helpful to consider a range of different types of demonstration projects and an incremental approach to delivery.

### **Do we need other delivery mechanisms?**

13. It is suggested that further consideration might be given to funding mechanisms involving the private sector, infrastructure trusts or use of the market by local government. In addition, European experience might be investigated.
14. 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.