

Response to NPF4

has read the responses by LINK environmental group and by Planning Democracy. It supports the majority of their representations, but adds some specific comments and suggestions.

1. fully endorses the discussion and recommendations of the whole of LINK's document.

For many years, and in giving evidence at planning proposals, has advocated in essence many of these proposals.

We endorse **all** the key recommendations of LINK. (pp.1-3.) We also endorse most of the points in the following discussions (pp14-15) made by LINK, leading to their recommendations affecting the following recommendations:-

1, 2, 3 (including para 3); 4, 6, 8, housing policy, 9, 10 on Parker Morris standards, 11, 12, 13, 14.

2. would go further, and in some cases be more specific, though some of its concerns will be raised again at regional and local plan level:-

a) Housing

i) A housing audit must include consideration of means of paying for repairs of existing housing where the owners cannot do so. Removal of VAT on repairs would assist, but in the case of repairs to neglected tenement housing, for example, there should be consideration of how this is to be enabled, alongside any planning provisions.

ii) Tenements¹ are a valuable form of Scottish housing which should be preserved. To be effective, a review of the planning process should be enabled which takes into account the possible effects on neighbours' quality of life as well as the structure itself when considering planning applications for internal alterations whether the building is listed or not.

Greater transparency in planning and building control is also necessary.

iii) Planning should take account of the context of applications, which should not adversely affect the existing community, its rights, livelihoods or quality of life.

iv) We are particularly supportive of the view that there should be no continuation of unbuilt planning applications.

We recommend that the practice of a nominal "start" which may consist of a length of footing or other minimal preliminary work, should be disallowed. Some are left for years.

[Some may even have been allowed where they would not currently be given permission in view of climate change.]

3. a) **NPF4 should be made feasible.**

i.e. the system of appeals also should be reviewed.

The current system of appeals favours the developer both financially and against any local arguments and policies, however well founded. It also can undermine the carrying out of national and local policies. There are insufficient safeguards.

b) NPF4 should be reviewed in 5 years to see whether its principles are being attained or could be improved.

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Tenements are properties which have been subdivided horizontally, as well as the traditional constructions of blocks of individual flats. The points about quality of life applies to all.

4, Health, climate change and changing circumstances

a) Air Quality

Air Quality has been a regular feature of [REDACTED] [REDACTED] s agenda for several years. It has interacted with scientists and officers and has given evidence at public enquiries.

- i) Measures should be undertaken in all planning matters to reduce the current level of dependence on the car and, where possible, on HGVs in inhabited areas. Good planning and design can minimize it.
- ii) The improvement in air quality and public health during the Covid 19 pandemic, where NO2 and PM2.5 emissions are concerned, has been dramatic. Consideration should be given to improving public transport, to making it universally accessible and assisting existing rural and suburban areas to be able to work closer to home or sustain local facilities, not just in new developments. In towns and cities local transport, and a reconsideration of parking policies that currently encourage incoming car use should be addressed.

b) We agree that the green belt should be preserved.

5. Wildlife and biodiversity

We agree with LINK that our seas and coastline are in need of protection. We would go further and suggest that there be an enquiry into the effect of commercial fish-farming on the sea and aquatic life, and an exploration of alternative methods and places of such farming. NPF4 could include a provision for changing this when/if found possible and controlling future expansion where damaging.

Conclusion

NPF4 should be looking to redress the inadequacies of current planning provisions.

It should also be making sure that where evidence suggests that damage can be solved there is a means in the legislation of so doing.

ENDs