

Response ID ANON-8KUC-UG4E-G

Submitted to National Planning Framework (NPF4)

Submitted on 2022-01-10 17:16:27

About you

Please read the privacy notice below and tick the box below to show that you understand how the data you provide will be used as set out in the policy.

I have read and understood how the personal data I provide will be used.

How your response will be published

I would like my response to be published in its entirety

What is your name?

Name:

Jennifer Hunter

What is your email address?

Email:

jennifer@culturecounts.scot

Are you responding as an individual or on behalf of an organisation?

Organisation

Would like to be contacted about future opportunities to get involved in this work, such as engagement events?

Yes

Organisation details

Name of organisation

Name of organisation:

Culture Counts

Information about your organisation

Please add information about your organisation in the box below:

Culture Counts is a network of arts, heritage and creative industries organisations. We advocate for the development and protection of culture as fundamental to our common future.

Mission

Our mission is to work with members to:

- promote the public benefit of the arts, heritage and creative industries
- protect the eco-system of the arts, heritage and creative industries for our common future; through administration and policy change
- demystify the operations of Government and Parliament; allowing more people from the arts, heritage and creative industries to influence policies that impact on them

Values

- Ambition: for the arts, heritage, creative industries & future generations.
- Broad mindedness: collaboration, innovative democracy, inclusion, learning and understanding different points of view.
- Creativity: experimentation, patience, and perseverance. Some changes are going to take time.

Consultation and development of the draft NPF4

Please provide your views on the consultation and development of NPF4 and how this has contributed to the draft.

Please provide your response in the box provided.:

Given the constraints due to Covid-19, the consultation that has taken place is accepted.

The consultation has been well organised and it has been very clear how to be involved.

However, the early stages of the consultation (2020 events) were tightly controlled, questions and topics for discussion were decided in advance. This causes discussions to be partly pre-determined. The events were very well designed and facilitated, though I wonder in future if we could open it up a little so that less is predetermined.

I would appreciate it if the Scottish Government would consider signing up to the principles of the Design Justice Network.

<https://designjustice.org/principles-overview>

Please provide your views on the structure of the National Planning Framework 4 document.

Please provide your response in the box provided.:

The structure is clear, and the visual design is good.

The 'purpose of planning' statement is good (page 3, para 1), though it's a little bland and lacks a feeling of ambition and action.

For example, a re-write where I change the language to be more positive would look this:

"The purpose of planning is to ensure that we develop and use land to build a wellbeing economy.

We want to create great places which centre our ambitions on future generations, improve health and wellbeing, restore biodiversity and adapt to climate change."

Please provide your views on the incorporation of the Scottish Planning Policy and coherence of the NPF4 document overall as a roadmap.

Please provide your response in the box provided.:

Part 1 – A National Spatial Strategy for Scotland 2045

What is your view on the Sustainable Places section?

Please provide your response in the box provided.:

What is your view on the Liveable Places section?

Please provide your response in the box provided.:

What is your view on the Productive Places section?

Please provide your response in the box provided.:

What is your view on the Distinctive Places section?

Please provide your response in the box provided:

What is your view on the 'Spatial principles for Scotland 2045' section?

Please provide your response in the box provided.:

Do you have any other comments on the National Spatial Strategy outlined in NPF4?

Please provide your response in the box provided.:

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The 'purpose of planning' statement is good (page 3, para 1), though it's a little bland and lacks a feeling of ambition and action.

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What is your view on the 'Action areas for Scotland 2045' section?

Please enter your response in the box provided? :

Action 2: Support the Blue and Wellbeing Economies

It may be useful to include a definition of Blue Economy and Wellbeing Economy within this action.

For example:

Blue Economy

The 'Blue Economy' is an emerging concept which encourages better stewardship of our ocean or 'blue' resources. It underpins the thinking behind the Commonwealth Blue Charter, highlighting in particular the close linkages between the ocean, climate change, and the wellbeing of the people of the Commonwealth.

(Source: <https://thecommonwealth.org/blue-economy>)

Wellbeing Economy

A Wellbeing Economy is certain about going 'beyond GDP', and to complement – or even replace – the metric with a broader set of social and environmental indicators fed by the ever-growing amount of publicly available data on wellbeing. This is what enables the Wellbeing Economy to tackle some of society's most looming issues such as loneliness and mental health problems, as well as complex climate and environmental challenges.

(Source: Wellbeing Economy Alliance)

This section misses out the arts, museums and creative industries. It's important to remember that residents and tourists are also interested in attending art galleries, cinemas, museums, theatres and music venues. There is good inclusion of heritage via the tourism sections and world heritage sites.

There is a need to include arts, museums and creative industries in this action, otherwise we're making assumptions about what people want to do with their time and missing the opportunity to offer people a sense of belonging and connection.

When we're thinking of improving outdoor infrastructure for camping for example, we need to also consider what will people be doing, what's the view from the tent? Is there a bandstand or potential for a natural amphitheatre?

If this action included arts, museums and creative industries it may look like this:

'Arts, museums and creative industries are a key sector, improvements in infrastructure and internet connectivity will ensure this sector can continue to make our places vibrant, interesting and beautiful. The sense of wellbeing of residents and visitors depend on the offering of opportunities to connect with each other, this is why the arts, museums and creative industries are important, they offer a chance to make a connection, a chance to belong, and this should not be overlooked.'

We need to remember that it's not always possible to be outside in Scotland. We need to design outside spaces to keep the wind away, maximise light etc. We have to prioritise user-centred-design.

Action 19: Grow a wellbeing economy

This action reads a little like we should focus on economic growth with the understanding that we should remember to think about how there might be hidden wellbeing impacts coming from the traditional view of economic growth. The focus seems to still be on traditional forms of economic growth, with a nod to other additional potential benefits. This will not lead us to realisation of a wellbeing economy.

This action misses out valuable jobs and industries, such as software and games development, a key growth sector. If we want to attract people to Scotland, we have to have a cultural offer. A job in a space-port will be available to very few people; whereas tech jobs could be available to thousands, if we create places where people want to live. e.g. Places with libraries, gardens, hot-desk hubs, cafes, cinemas, parks. This is why it's important to look more closely at the word wellbeing. We don't have to start with economic growth and end up with wellbeing. We could if we were radical start with wellbeing and end up with economic growth.

The last paragraph of this action leans towards this, as follows:

"Significant investment in our health and social care, justice and learning estates will continue to provide important sources of employment and income for smaller scale local businesses.

Town centres

throughout this area will also play a critical role in driving a new economic future. The recent town centre review highlights opportunities to expand the range of services and facilities they offer, reuse redundant buildings and provide new homes for a wide range of people. This in turn will ensure their crucial role in defining our sense of place is protected and enhanced, future-proofing a key asset for Scotland as a whole."

I think this should be the first paragraph and not the last paragraph as this is where we need to get to. It's important to centre this thinking and to include a definition of wellbeing economy.

In relation to all of the above, please see the link below to a recent piece in the Scotsman by Councillor John Alexander (Scottish Cities Alliance)
<https://www.scotsman.com/news/opinion/columnists/how-cultural-activity-can-fuel-scotlands-covid-recovery-john-alexander-3502365>

Do you have any other comments on the Action areas for Scotland 2045 outlined in NPF4?

Please enter your response the box provided.:

Part 2 – National Developments

Please provide your views on each of the National Developments in the text boxes provided below.

Central Scotland Green Network :

National Walking, Cycling and Wheeling Network :

Urban Mass/Rapid Transit Networks (Aberdeen, Edinburgh, Glasgow):

Urban, Sustainable Blue and Green drainage solutions :

Circular Economy Material Management Facilities :

Digital Fibre Network :

Island Hub for Net Zero :

Industrial Green Transition Zones :

Pumped Hydro Storage :

Hunterston Strategic Asset :

Chapelcross Power Station Redevelopment :

Strategic Renewable Electricity Generation and Transmission Infrastructure :

High Speed Rail :

Clyde Mission :

Aberdeen Harbour :

Dundee Waterfront :

Would it be possible to include the significance of the cultural offer in Dundee to the success of securing transformational projects?

From Page 16:

"Continued delivery of the waterfront transformation is crucial to securing the role of the city as a location for investment in the net zero economy."

For example please see a recent piece in the Scotsman from Councillor Alexander.

<https://www.scotsman.com/news/opinion/columnists/how-cultural-activity-can-fuel-scotlands-covid-recovery-john-alexander-3502365>

Edinburgh Waterfront :

Stranraer Gateway :

Please provide any other comments on the National Developments section of the NPF4?

Please provide your response in the box provided.:

Part 3 – National Planning Policy

Please provide your views on each of the National Planning Policies in the text boxes provided below.

Policy 1: Plan-led approach to sustainable development :

Policy 2: Climate emergency :

Policy 3: Nature crisis :

Policy 4: Human rights and equality :

The consultation that we currently use to consult communities is not currently user-led.

When we create tools such as the Place Standard, although well-meaning, we are deciding what the parameters of the conversation with communities is, in advance.

Whoever controls the questions, controls the outcome.

Community consultation technology is currently produced outwith Planning Legislation and therefor has the power to quietly control outcomes for communities.

It is important for planning that will impact on communities to be user-led and Culture Counts support the principles as laid out in Design Justice Network.

<https://designjustice.org/principles-overview>

In order to ensure that design of technology is user-led, Culture Counts would support the exploration of the idea of appointing V&A Dundee as a statutory consultee for the development of any future government led consultation tools. V&A Dundee would be consulted on the development of software for the purpose of community consultation to ensure that user-centred-design principles are followed.

Policy 5: Community wealth building :

Policy 6: Design, quality and place :

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Policy 7: Local living :

Policy 8: Infrastructure First :

Policy 9: Quality homes :

Quality Homes: G

What is Antigypsyism/anti-Tsiganism/ Romaphobia?

Antigypsyism/anti-Tsiganism/Romaphobia essentially means the same thing and is a specific and long-established form of racism. Throughout history, the words "Gypsy", "Tsigane/Zigeuner", and similar terms, have been used. These words have taken a derogatory connotation in very many languages.

This section is not using enabling language, it's providing a list of ways to stop people living in a particular way.

Policy 10: Sustainable transport :

Policy 11: Heat and cooling :

Policy 12: Blue and green infrastructure, play and sport :

Policy 13: Sustainable flood risk and water management :

Policies 14: Health and Wellbeing :

Policies 15: Safety :

Policy 16: Land and premises for business and employment :

Policy 17: Sustainable tourism :

Policy 18: Culture and creativity :

It's great to see that the impact of culture and creative industries has been recognised and included in NPF4.

The Scottish Governments commitment and realisation of the Agent of Change principle is noted and appreciated.

Policy 18b

I'm not sure that 'public art' is the phrase that the drafter intends?

Instead we could consider for example:

b) Development proposals should consider how to provide opportunities for community belonging and connection by consulting the arts and creative community where they involve a significant change to, or the creation of new public spaces.

It's not about including a piece of public art, to make the place look nice. It's about creating beautiful spaces where people can connect with other people and feel a sense of belonging. Working with the local arts and creative community to think things through will produce ideas which wouldn't have otherwise been realised.

Policy 19: Green energy :

Policy 20: Zero waste :

Policy 21: Aquaculture :

Policy 22: Minerals :

Policy 23: Digital infrastructure :

Policies 24 to 27: Distinctive places :

Policy 28: Historic assets and places :

F)

Should community consultation take place before a building is demolished?

It could be that the local authority do not deem the building to be valuable, whereas the local community disagree.

There is also often scope for arts, heritage and creative industries to use buildings and re-purpose them. For example The Whiskey Bond in Glasgow.

Policy 29: Urban edges and the green belt :

Policy 30: Vacant and derelict land:

Policy 31: Rural places :

Policy 32: Natural places :

Policy 33: Peat and carbon rich soils :

Policy 34: Trees, woodland and forestry :

Policy 35: Coasts :

Any other comments on the NPF4 Draft

Do you have anything else to add in relation to the draft of the National Planning Framework (NPF4)?

Please provide your response in the box provided. :

This section has two parts.

Part 1

The six qualities of successful places

1 Designed for life-long health and wellbeing

This section only offers 'active' solutions to physical health and wellbeing.

Whereas people access health and wellbeing in various ways including by attending a local choir, or dance group.

Other solutions could be covered in the following way.

Proposed re-draft

By encouraging healthy lifestyles, through walkable neighbourhoods, as well as opportunities for connection and belonging, we can ensure equitable access for everyone (regardless of gender, age, ability and culture) to well-designed buildings and a nature-rich local environment, including quality blue/green spaces that are cared for and well maintained.

2 Safe and pleasant

Why is the word joy in quote marks?

It seems like what this paragraph is getting at is more along the lines of:

"designing, or retrofitting spaces of all sizes and purpose to enable connection and belonging, to encourage happiness and a sense of joy"

This section could be called 'Connection and Belonging' instead of 'Safe and pleasant'.

The word playful seems to infantilise the feeling of happiness, like I have to pretend to be a kid, in order to feel happy.

6 Adaptable

A re-draft (to include user centred design)

"By building in flexibility in line with circular economy principles, so that they can quickly be changed to accommodate different uses as well as maintained over time.

By recognising the need for consultation and user-centred-design to change and cope with social, economic and environmental pressures as well as accepting the critical role of ongoing maintenance to ensure resilience and community wellbeing over time."

Part 2

Throughout the document the NPF4 uses the word 'Recreation'.

Recreation is not really used in day to day language and means different things to different people.

We propose that 'Recreation' is replaced throughout with 'Culture and Leisure'.