

10 Big Ideas for National Planning Framework 4

RTPI Scotland response to Scottish Government's call for ideas

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2100 members in Scotland and a worldwide membership of over 25,000. RTPI Scotland's members will in large part be responsible for the successful implementation of the National Planning Framework

Background

The Scottish Government has issued a call for ideas to hear views on the future of planning in Scotland, focusing on the following questions:

1. What development will we need to address climate change?
2. How can planning best support our quality of life, health and wellbeing in the future?
3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?
4. What policies are needed to improve, protect and strengthen the special character of our places?
5. What infrastructure do we need to build to realise our long term aspirations?

RTPI Scotland welcomes the open, transparent and inclusive way that Scottish Government is seeking ideas on the next NPF and is keen to provide constructive ideas and thinking to support this. This paper outlines 10 'Big ideas' for NPF4. These have been informed by a call for evidence we launched for our members in December 2019. The details of the responses received can be found at Annex 2.

What Scotland Needs – 10 Big Ideas

We have developed 10 'Big Ideas' to help guide the format, shape and content of the 4th National Planning Framework. We would be happy to further develop the detail of these and explore how best to ensure that they are measurable and actionable given the important role the NPF will play in not only providing a vision for Scotland's future development but also to support local policy and the determination of planning applications.

Our 10 Big Ideas are:

- 1. NPF4 embeds the new purpose of planning.**
Ensure that the National Planning Framework embeds the purpose of planning, to "manage the development and use of land in the long term public interest" and, as part of this, recast the measures of planning performance to be more focussed on outcomes.
- 2. NPF4 is supported by a capital investment programme.**
Ensure that NPF4 is accompanied by a 10 year capital investment programme with buy in from across government.
- 3. NPF4 is a "First Minister's document".**
Ensure that NPF4 is a key corporate document that influences Scottish Government decision making and has buy in from all Cabinet Secretaries in supporting their Post Covid-19 recovery ambitions and as a vision piece on planning for the 'new normal'.

- 4. NPF4 contains milestones that are tracked transparently.**
Ensure that NPF4 includes short-, medium-, and long-term milestones and establish a delivery oversight group (which should include representatives from younger generations) to report annually on progress being made and implications of changing contexts.
- 5. NPF4 prioritises climate action and tackling health inequalities.**
Structure the NPF around outcomes which are tied into planning authority performance assessment frameworks and priority strategic themes on achieving climate action, delivering a net zero carbon Scotland and improved health and wellbeing.
- 6. NPF4 promotes active and sustainable travel.**
Include large scale improvements to active and sustainable transport networks across Scotland as a national development.
- 7. NPF4 embeds the Reuse First Principle**
Ensure that the reuse first principle - where previously used land, buildings, places, materials and infrastructure are given preference to new - is applied across all of planning for places.
- 8. NPF4 promotes decision making based around the well-being of future generations.**
Ensure that NPF4 adopts and embeds the principle of planning decisions that provide long-term positive impacts to prevent persistent problems such as poverty, health inequalities and climate change and which meet the needs of future generations.
- 9. NPF4 becomes The National Plan for Scotland**
Position the NPF as the spatial articulation of the Scottish Government's National Outcomes - much as development plans are the spatial articulation of Local Outcome Improvement Plans - which clearly sets out relationships between the planning at national, regional, local and community levels.
- 10. NPF4 embeds and champions the Place Principle and Place Standard Themes**
Embed "Place and Wellbeing" themes from Place Standard and ensure collaborative implementation of the NPF through the place principle

The context for each of these is set out below.

What the NPF needs to do

RTPI Scotland believes that the 4th National Planning Framework provides an opportunity to effect real, positive change to the planning system. We want to see changes that make it easier for planners to maximise their contribution to building a more sustainable and successful Scotland.

RTPI Scotland has prepared this position paper to set out implementable changes to the planning system that can be achieved through the National Planning Framework. This has been prepared with the intention of supporting the development of a system that is able to deliver the key outcomes of achieving net zero carbon by 2045 and tackling inequalities, especially health inequality, across Scotland.

The current situation regarding Covid-19 shows the need to plan, prepare and provide a routemap for a different Scotland. There is a need to agree that we need a new normal and how we achieve this. We need to embed resilience into how our cities, towns, villages and neighbourhoods function and develop over time. This needs to embrace risk in a more positive and constructive way.

The Covid-19 emergency has highlighted a number of issues that will have an influence on the way our built environment needs to change. Issues about how we ensure people have equal accessibility to the things they need such as shops, green space, leisure and jobs. How the built environment will be changed by new behaviours and how it can also influence how people behave. How communities will function in the future and how they will engage with institutions and one another. How our towns, cities and villages will look in the future given possible new opinions on design and density to minimise carbon emissions as well as virus transfer. And how we take forward and stimulate an economy that serves everyone whilst protecting and enhancing our environment.

To make this change RTPI Scotland is of the view that there is a need to undertake the following shifts:

- From short term thinking to long-, medium- and short- term thinking
- From having many overlapping and disjointed strategies to complementarity
- From an opportunistic, reactive approach to development to a planned, proactive approach
- From economic priorities to holistic priorities covering environmental, social and economic issues
- From a competitive investment approach to one of managed investment
- From a deal-making approach to one based on providing a place vision first
- From short-term, project focussed investment to a planned long term holistic vision

The NPF should take this approach and provide a long term vision of Scotland in 2050. It needs to set out what we want Scotland to be like in 30 years' time and have clear milestones to provide the pathway to achieving its ambitions.

Doing this requires a planning system that is:

- corporate and collaborative to support and influence investment and policy across local and national government
- frontloaded and proactive system to allow for community and stakeholder engagement on the priorities for an area and who is going to take them forward
- able to deliver development by ensuring the vision for an area is viable and resourced
- recognised as a valuable way of providing solutions to complex issues, and resourced to fulfil this task

Delivering a new planning system for Scotland

RTPI Scotland believes that NPF4 needs to include a bold strategic framework as a meaningful component to underpin delivery of the whole plan.

Unlike its predecessors, the enhanced status and longer term of NPF4 means that to be effective it needs to be durable, truly visionary and be the cornerstone of Scotland's new planning system for at least 10 years. To achieve this, the strategic framework should be led by a succinct, holistic and spatially based vision for Scotland in 2050, supported by a limited number of strategic objectives or principles.

The Role of NPF4

Acting together the vision and strategic objectives/ principles should:

Champion and further define/ explain the statutory purpose of planning – including providing a clear definition of sustainable development (aligned rather than competing with the Scottish Government's 'inclusive & sustainable economic growth' concept

Set out Scotland's spatial vision for 2050 – Providing a spatial vision for 2050 rather than being tied to individual current thematic plans. Whilst the vision should certainly include responding to the climate emergency, it must also reflect the need to improve health, prosperity and environmental quality for all. This will include planning to meet the housing and connectivity needs of current and future generations.

Provide a high level vision and objectives - to support delivery of NPF4 itself the vision should be supported by a limited number of strategic objectives/ principles. Rather than adding another layer of complexity, these should function as meaningful, 'central organising concepts' throughout NPF4, and by implication the wider planning system. To be effective the strategic objectives/ principles should synergise the diverse sets of statutory NPF4 Outcomes and Scottish Government's National Outcomes and, in doing so, provide a clear direction of travel and series of key expectations regarding *how* planning should help delivery these outcomes such as, for example, the need for planning to be evidence based.

Align and Influence - Once finalised in NPF4, the bold spatial vision and strategic objectives/ principles (i.e. the strategic framework) should play an important role in governance and serve as the core of future policy development in Scotland. This would help to align funding/ investment decisions, thematic strategies, enhance links between spatial and community planning and avoid silo working, whilst also strengthening the durability of NPF4 itself.

The Shape of NPF4

Responding to key challenges and opportunities facing Scotland to 2050 NPF4 needs to be:

Long Term - NPF4 is the Scottish Government's opportunity to link together strategies, spending priorities and visions in a coherent spatial framework. In doing so, NPF4 must include a national spatial strategy which is bold, evidence based and durable. It should be capable of functioning as a spatial strategy for 10+ years, not overly tied to current thematic policies.

Deliverable - As well as identifying the key spatial priorities, issues and opportunities facing Scotland to 2050, the NPF4 spatial strategy needs to include an emphasis on *how* the strategy will be delivered e.g. how it reflects regional priorities, relates to key planning stakeholders and aligns with funding, bearing in mind the spatial strategy needs to be durable for 10 years.

National Developments - Any identified National Developments must be seen fundamentally as part of the NPF4 spatial strategy, rather than being viewed or selected separately. The identification of National Developments should therefore align with key priorities, issues and opportunities identified in indicative Regional Spatial Strategies (RSS). National Developments also need to be flexible enough to respond to changing circumstances.

Housing - In relation to housing delivery, whilst there is a clear and useful role for national government, the regional and local nature of housing markets needs to be recognised in setting housing targets and planning for their delivery. NPF4 also needs to provide sufficient flexibility to accommodate changes in housing need throughout its implementation period.

Transport - In relation to connectivity, NPF4 should operationalise the strong platform for Scotland's future transport system now set out in National Transport Strategy 2 (NTS2). This means transport investment decisions can and should in future be primarily based on their alignment with NTS2, NPF4, RSSs and where appropriate LDPs. This would help to integrate spatial and transport planning to achieve the NPF4 vision, which presently follow different decision making criteria.

The Big Ideas emanating from this are:

- 1. NPF4 embeds the new purpose of planning.**
the Ensure that the National Planning Framework embeds the purpose of planning, to “manage the development and use of land in the long term public interest” and, as part of this, recast the measure of planning performance to be more focussed on outcomes.
- 2. NPF4 is supported by a capital investment programme.**
Ensure that NPF4 is accompanied by a 10 year capital investment programme with buy in from across government.
- 3. NPF4 is a “First Minister’s document”.**
Ensure that NPF4 is a key corporate document that influences Scottish Government decision making which has buy in from all Cabinet Secretaries in supporting their Post Covid-19 recovery ambitions and as a vision piece on planning for the ‘new normal’.
- 4. NPF4 contains milestones that are tracked transparently.**
Ensure that NPF4 includes short-, medium-, and long-term milestones and establish a delivery oversight group, which should include representatives from younger generations, to report on progress being made and implications of changing contexts on annual basis.

Addressing climate change

There is a need to bear in mind the longer time horizon for NPF4 and what that affords. It must align with other work coming out of Scottish Government, such as the Infrastructure Commission which focusses on reuse of exiting assets which is a theme that ought to be repeated in NPF4. There is also need to be mindful that NPF4 is a strategic document which will have a full set of regional spatial strategies below it. Given this policy in NPF4 should guide those individual strategies to respond to the climate emergency given issues such as energy production and transmission, flooding and coastal erosion transcend boundaries. This could provide opportunities to support jobs and the economy. Decarbonisation supports locally generated jobs and income generation. Greater connectivity supports repopulation which produces more sustainable places where people can work and live.

Finally there is a need to recognise that policy to support climate change and health and wellbeing are strongly linked. NPF4 can emphasis the role of place themes to deliver on both.

Achieving net zero emissions by 2045

Placemaking - Increased urban density has a clear link with reducing carbon emissions however a policy framework is required that achieves this without compromising on quality of place. Research on the adoption of Scottish Planning Policy in LDPs recommended greater emphasis on placemaking at the forefront of development and that NPF4 should be more directive in ensuring principles are implemented. Given this NPF4 should therefore be more prescriptive to ensure that placemaking principles are carried through to development management

Place Sustaining - Planning and placemaking tend to focus on and favour the new. There is a need to change the narrative to be about place sustaining using what we have and building on it both to make it more resilient and to secure what is special about places for future generations. We need to be wary of the unintended consequences of not joining up the different elements that make a place – Environmental, social, and economic.

Connectivity - Both physical and digital connectivity is key to supporting sustainable and inclusive economic growth. There needs to be a stronger emphasis on connectivity and multi-modality in policy wording. This should include identification of multi-modal hubs and encouraging multi-method travel through provision of infrastructure and improved processes. Policies should encourage lower maximum parking standards in areas well served by public and active transport.

Energy - Our energy systems need to be transformed. Scottish Power estimates that we need to quadruple the level of renewable energy production in Scotland to meet climate targets and this has implications for our landscapes, seascapes and transmission from energy production to distribution. Battery storage will only cope with short term fluctuations not long term storage. To meet zero-carbon targets, Scotland will need to build upon good progress made towards the decarbonisation of electricity and significantly increase the decarbonisation of heating. More widely, consideration should be made as to how planning policies can support investment in low carbon infrastructure and innovation.

Flooding - With increased flood risks resulting from climate change, the need to manage flood risks, develop plans to address flooding, including natural flood management where possible, and enable better planning decision regarding flooding will require even more primacy in NPF4. This requires a stronger policy framework to encourage blue-green infrastructure to address surface water flooding as a climate change mitigant and an adaptation measure, as well as delivering a range of wider benefits to people and wildlife. In addition a stronger national spatial focus on impacts of sea level rise and coastal erosion on vulnerable communities, infrastructure and land uses (especially agricultural land) is required. This should address the reality that communities and critical infrastructure may have to relocate in the lifespan of the plan and ensuring that new development is future proofed to cope with the long term predicted effects of climate change on the coast

Creating Resilient Places

Places can and should be made more resilient to the long term impacts of climate change. This can be supported by:

Location - Policy emphasis on location of new housing development on public transport corridors and making new housing accessible by public transport in LDPs. Early engagement with public transport providers in LDP preparation,

Density - Increased urban density has a clear link with reducing carbon emissions however a policy framework is required that achieves this without compromising on quality of place. Research on the adoption of Scottish Planning Policy in LDPs recommended greater emphasis on placemaking at the forefront of development and that NPF4 should be more directive in ensuring principles are implemented.

Landscapes - Give our landscapes a purpose that transcends a single function or industry. Forestry, peatland, renewable energy production, floodplains all need to be both protected and developed in the right places to support a low carbon economy and they then need to be maintained and “protected”

The Big Ideas arising from this are:

- 5. NPF4 prioritises climate action and tackling health inequalities.**
Structure the NPF around outcomes which are tied into planning authority performance assessment frameworks and priority strategic themes on achieving climate action, delivering a net zero carbon Scotland and improved health and wellbeing.
- 6. NPF4 promotes active and sustainable travel.**
Include large scale improvement to active and sustainable transport networks across Scotland as a national development.

7. NPF4 embeds the Reuse First Principle

Ensure that the reuse first principle - where previously used land, buildings, places, materials and infrastructure are given preference to new - is applied across all of planning for places.

Tackling Inequalities

NPF4 needs to improve the health and wellbeing of people living in Scotland. It should define and support a consistent ask around how place must contribute to public health reform and Scotland's national outcomes. This must include the following:

Place Environments

There is a need for NPF4 to explain that place is predominately made up of four linked environments. Physical, social, economic and digital and that this exists at all levels: neighbourhood, town, council area and region.

Consistent National Policy Support

NPF4 should:

- Embed the themes and aspirations in the Place Standard to provide an evidenced, consistent framework for Scotland. As a national level "Place and Wellbeing" policy requirement they provide a simple, understandable remit for how place impacts behaviour change to improve health and wellbeing, reduce carbon emissions and improve biodiversity. The themes are valuable for their contribution to all aspects of place including digital. They are simple, already well understood and all sectors with an interest in place are already using them.
- Embed the Place Principle at national and local level to promote the place based collaborations needed to link up "Place and Wellbeing" themes and meet NPF4 outcomes.
- Embed population health data needs as part of the evidence base informing and shaping national and local policy. There is a need to support planning authorities to get access to this to inform proposals and policies. National and local policy making needs to collaborate with Public Health Scotland and local health boards on a data first approach that informs place based solutions. There is also a need to consider training around data analysis.

Address the Complexity

Current collaboration between planning and public health is confused. This is a two way responsibility. Local Health Boards are already statutory consultees on Local Development Plans but much needed collaboration is hampered by having no named contact and the need to consult on three different issues: policy to deliver healthier places, provision of health facilities and NHS asset management. An identified contact for each in Local Health Boards is needed to enable collaboration. An identified contact in planning authorities is, likewise, needed. The establishment of Public Health Scotland on 1 April 2020 requires discussion to clarify their role in a complex landscape.

SEA as a plan making tool

NPF4 should support the proactive and integrated use of strategic environmental assessment (SEA) and wider assessments (e.g. Equalities Duties under the Public Sector, Fairer Scotland and Island duties) as plan making tools to embed sustainability, equalities and health considerations in plans and strategies from the outset. This would mark a departure from current assessment processes which tend to adopt a narrow remit and focus on retrospective statutory reporting. In doing so, NPF4 should encourage the consideration of public health issues within SEA (in relation to the human health and population topics) and more widely the Scottish Government should consider the potential for Public Health Scotland to become a SEA Consultation Authority.



Food Environment

NPF4 needs to recognise the contribution of planning in creating a healthier food environment as part of a whole system approach not a key driver. As such it needs to be considered when it is part of bigger picture, be that nationally or locally. There is a need to recognise work already done by Public Health England on behaviour change and lifestyle choice based approaches where Planning will only be supported as a restriction when a whole system approach is being implemented.

Our Big Ideas based upon this are:

8. NPF4 promotes decision making based around the well-being of future generations.

Ensure that NPF4 adopts and embeds the principle of planning decisions that provide long-term positive impacts to prevent persistent problems such as poverty, health inequalities and climate change and which meet the needs of future generations.

9. NPF4 becomes The National Plan for Scotland

Position the NPF as the spatial articulation of the Scottish Government's National Outcomes - much as development plans are the spatial articulation of Local Outcome Improvement Plans - which clearly sets out relationships between the planning at national, regional, local and community levels.

10. NPF4 embeds and champions the Place Principle and Place Standard Themes

Embed "Place and Wellbeing" themes from Place Standard and ensure collaborative implementation of the NPF through the place principle

Contact

If you wish to discuss or require more information please contact Craig McLaren, Director of RTPI Scotland on craig.mclaren@rtpi.org.uk or by calling 0131 229 9628 or 07850 926881

Annexe 1 - Context

Planning (Scotland) Act 2019

Changes made by the Planning Act mean that the 4th National Planning Framework will be different from previous versions. This provides a real opportunity to recast how the NPF works, what it looks like, who it is used by and what it says.

The Planning (Scotland) 2019 Act has a number of important implications for the NPF:

- **Relationships** It must have regard to relevant policies and strategies including infrastructure investment plan, national transport strategy, strategic transport projects review, land use strategy, programme for adaptation to climate change, air quality, land rights and responsibilities statement prepared under Land Reform (Scotland) Act 2016, Strategy on ownership or use of land and the national marine plan
- **Outcomes** It must have regard to achieving the following outcomes
 - meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people
 - improving the health and wellbeing of people living in Scotland,
 - increasing the population of rural areas of Scotland,
 - improving equality and eliminating discrimination,
 - meeting any targets relating to the reduction of emissions of greenhouse gases, within the meaning of the Climate Change (Scotland) Act 2009, contained in or set by virtue of that Act, and
 - securing positive effects for biodiversity
- **Format** The NPF will need to be updated every 10 years, rather than every 5 years, bring a longer horizon for its vision and implementation. It will also combine the spatial plan for Scotland with the Scottish Planning Policy.
- **Parliament** The NPF will have a higher level of engagement with and great scrutiny undertaken by the Scottish Parliament given a larger 120 day scrutiny period and the need for a motion to agreed approving the document.
- **Ownership** The increased political scrutiny and the fact that the NPF will become part of Local Development Plans means there a number of stakeholders and 'owners' of the NPF including Scottish Government, local authorities, communities and politicians.

Our Members

We asked our member what their thoughts for NPF were through an open call for evidence. The key findings were:

Annexe 2 – Summary of Member Responses on NPF4



Climate change action at the heart of NPF4

Most requested policy theme

Other themes to link to climate change action and sustainability
Climate change action should underpin entire framework



Format of NPF3 well-received

Format of the themes in NPF3 supported

Each theme in NPF4 should link to climate change action
NPF4 should embrace economy, and environment and society



Ongoing, inclusive engagement

Engage with experts and communities from start to finish

A cross-sector approach was deemed “critical”

Several suggestions for improving accessibility and inclusivity



Deliverability

Show clearly how each theme is going to be delivered

Clear referencing of how policies will deliver objectives

Monitoring of NPF4 to make sure it is delivering

Flexibility to make changes if NPF4 is not delivering



Future proof NPF4

Sustainability and climate change goals

Technology and online services for engagement

Framework itself more user-friendly, particularly for online and device use

Improve the wording of themes to reflect future trends or goals