



CALL FOR VIEWS ON THE DRAFT FOURTH NATIONAL PLANNING FRAMEWORK (NPF4)

SURF Submission to Local Govt, Housing and Planning Committee | Jan 2022

Overview

SURF engaged with the Scottish Parliament's [Local Government, Housing and Planning Committee](#) on the development of NPF4, the Scottish Government's long-term plan for national planning priorities that sets out strategic objectives, regional goals, and major projects.

In response to [a call for views](#) on the content of a draft NPF4 publication, we provided a short submission to the Committee, which follows.

SURF's View on the Consultation and Development of NPF4

Introduction

SURF is planning some formal consultation activity on NPF4, with its network of more than 300 cross-sector member organisations that are concerned with the regeneration of Scotland's poorer communities, in February and March 2022. In the meantime, we have engaged in some initial discussions on the NPF4 as drafted with selected SURF members and partners.

The views below are drawn from these discussions, and from SURF's [2021 Manifesto for Community Regeneration](#), which featured recommendations relating to the Scottish planning system and key NPF4 themes including climate change, community empowerment, 20 minute neighbourhoods, infrastructure investment, and sustainable economic development.

Aims and Themes

In general, those consulted by SURF are in agreement with the general aims and principles of NPF4. The shared focus on addressing climate change, empowering citizens and community groups, improving the quality of our communities, reversing economic decline in places and regions with deep-rooted challenges, and productively reusing vacant and derelict land in towns and cities, aligns well with SURF's vision of successful place-based regeneration across Scotland.

One thematic area that could be more prominent is the potential of NPF4 to address poverty and inequality. The SURF network has a general concern that higher capacity community groups in more affluent places are better equipped to engage with the planning system, and to progress delivery of local aspirations more generally, than those in deprived places. This imbalance may not be adequately reflected in NPF4 and other strategies and policies that encourage greater community involvement in local-decision making. Despite best intentions, the overall effect may exacerbate, rather than narrow, existing inequalities between places, as community bodies in

more affluent places are better-placed to access resources and expertise, represent community views, liaise with planning authorities, and negotiate with decision-makers, than those in poorer places.

A targeted focus on community development support in our deprived places, where community capacity, skills, and confidence tend to be lower, could help to address this reality. Fuel poverty, in particular, is mentioned with some regularity in the draft NPF4. SURF would encourage the Scottish Government to make all reasonable efforts to help increase community capacity in places with multiple deprivation issues, to enhance the scope for NPF4 to support tangible physical, environmental, social and economic improvements, and reduce all types of poverty.

A related issue is that most planning developments happen in places where market forces are strong and demand for land is high, which hinders the ability of NPF4 to influence outcomes in poorer places. An increase in the delivery of social housing in deprived places, where need is often in evidence, was identified as one ‘counter-market’ approach that could offset this, and prioritising the refurbishment of vacant buildings could be used to reduce the carbon cost associated with new housing developments. The growth of community led housing in rural Scotland could also be explicitly supported by NPF4 as a valuable tool to reduce depopulation, a major driver of rural poverty.

SURF is a keen proponent of culture-led regeneration. Through our annual SURF Awards for Best Practice in Community Regeneration, we have showcased many successful examples of the transformative local impacts that have emerged from a cultural asset in economically challenged communities across Scotland. The draft NPF4 appears to focus on a ‘market demand’ for culture, which may not support cultural provision in our most deprived communities. It also isolates culture and heritage and fails to make the most of the wider benefits of their provision and existence by focusing on designated assets, as opposed to what communities identify as important to them.

A final thematic area that some felt NPF did not fully take into account, is the legacy of COVID-19. There are wide predictions around long-term, permanent shifts, such as increased demand for working-from home facilities and reduced demand for offices and retail space, that the NPF4 draft does not engage with, beyond identifying COVID-19 as a general challenge to adapt to. Contemporary economic trends, such as the growth of the ‘gig economy’, which has significant implications for transport infrastructure and 20 Minute Neighbourhoods, are also notable by their absence.

Key Challenges: Lack of Resources

A number of SURF contacts felt the admirable aims may prove difficult to implement in the context of a fundamental lack of resources. Three different areas were highlighted as requiring significant investment to support the deliverability of NPF4. They are:

Community Level: As SURF highlighted in its response to the [2021 Scottish Government consultation on Local Place Plans](#), the laudable objective of empowering community groups to have a stronger influence on how the places they represent are shaped, requires a considerable level of investment. SURF has been vocally supportive of the growing focus in general regeneration policy on community led activity and plans, but we have consistently raised concerns that the decline in community development support functions at the local government level since 2008, alongside other developments, has made it difficult for community groups in many places to position themselves to engage meaningfully in place-based regeneration.

Local Authority Level: There is a capacity challenge among local government regeneration officers, who reported in SURF's 2021 Manifesto consultations as being overwhelmed with new policy and strategy. There is a concern that NPF4 will add to a busy and complex policy landscape around place-based regeneration, with its conflicting priorities and added reporting pressures, rather than simplify it. This issue is set in a challenging context of budget cuts, departmental mergers and early retirement of skilled staff in local government in Scotland; a legacy of the 2008 economic crash. RTPI Scotland also highlight [particular pressure on planning departments in Scotland](#), which they report as having collectively suffered a 42% cut in real terms since 2009, despite an increase in planning duties and obligations.

National Project Level: Some SURF members noted that NPF4 presents a 'wish list' of desirable nationally significant developments, and not a concrete delivery plan. There is a concern that many may not ultimately happen unless there is a clear allocation of resources and a commitment to action plans. The Republic of Ireland's National Planning Framework was noted as being supported by a 10 year Capital Investment Plan, which presents a model the Scottish Government could potentially follow.

Key Challenges: Lower Status & Barriers to Implementation

Some SURF consultees shared questions and expressed concerns around the general status of NPF4, its hierarchy in the general policy environment in Scotland, and the extent to which it places meaningful duties on developers, planning authorities and other stakeholders.

One recurring point concerned the general language in the draft document, which uses words like "should" instead of "will", to suggest actions that are being encouraged rather than required. In the experience of many in the SURF network, "soft" strategies that argue for change are much less effective than "hard" strategies that place clear and robust responsibilities on institutions and organisations. If NPF4 is to make a serious effort to progress its ambitious thematic goals, the language could be revised to provide clarity on duties that must be followed.

As previously stated, the role of NPF4 in the regeneration policy landscape is generally unclear to SURF consultees. There are also concerns around integration and alignment with the existing planning system. For example, some reported difficulties in understanding where Local Place Plans would sit practically in the NPF4 framework, and in seeing connections between NPF4 and other existing and forthcoming Scottish Government strategies and Bills.

There is a general concern that Scottish National Planning Frameworks have a lower status in local and national government generally than they should, with many relevant areas of government not participating meaningfully in their development or implementation. Again, a contrast was drawn with the Irish National Planning Framework, which is formally adopted by the Taoiseach, and which is perceived as having a higher standing than the Scottish equivalent.

There is acceptance around the difficulties and conflicts inherent in marrying top-down and bottom-up dynamics in NPF4, which seeks to deliver a national strategy that makes a difference in all of our places, while providing adequate space for local decision-making. There was, however, some scepticism as to whether NPF4 has the right balance on this, with some arguing that communities have a small sphere of influence as compared to developers and local authorities in the current draft, and that not enough will be done "with" – rather than "to" – communities in the present vision.

Key Challenges: Disconnected from Place Principle

Some SURF consultees expressed surprise at the infrequent and/or shallow references to the Place Principle, 20 Minute Neighbourhoods and Community Wealth Building in the draft NPF4.

As highly relevant policy ideas that have a prominent status in the current Programme for Government, and the Manifestos and Shared Policy Programme of the Scottish National Party and Scottish Greens, there was disappointment that these concepts were referred to only occasionally or in name only, with a lack of content on integration and implementation.

The Scottish Government's Place Principle is widely viewed within the SURF network as being valuable and helpful, and SURF participated formally on the steering group behind its development. 2021 SURF Manifesto consultees reported that practice is generally not aligning with expectations, and that too many place-based interventions are led by a single agency working to a short-term goal, rather than genuine collaborations based on a long-term vision. There is scope for the NPF4 to at enhance the prominence of the Place Principle, which is mentioned just four times in 131 pages in the current draft, and to make a firm connection between the aims of NPF4 and the Place Principle.

20 Minute Neighbourhoods and Community Wealth Building are mentioned more frequently in the publication, but almost always in passing, with little to say on measurement or delivery. Where other policies link directly to older strategies and supplementary guidance, there is an opportunity to link to the nascent 'Our Place' website, referenced in the recent Programme for Government as an information hub for the Place Principle. SURF has already provided the Scottish Government with suitable case studies from the independently judged SURF Awards for the website.

Some recognised a tension between 20 Minute Neighbourhoods and the national developments, some of which aspire to create large employment clusters in rural places, which is likely to see many workers commute by car. This was seen as counter to wider policy objectives around climate change and sustainable economic development, which aspire to create new employment opportunities in places people live, with easy access for communities and presenting a choice of transport modes. Some also queried the applicability of the 'city-centric' 20 Minute Neighbourhood idea to rural places. It was suggested the next draft of NPF4 may wish to clarify the relevance of this approach only to larger urban places, and to instead target a more realistic "living well locally" aspiration in the rest of the country.

SURF is grateful to the Committee for considering our response. SURF is clear that Committee scrutiny will add value to the final NPF4 development, and we would be pleased to elaborate on our submission and provide further evidence as desired.

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