



CONSULTATION RESPONSE: DRAFT FOURTH NATIONAL PLANNING FRAMEWORK (NPF4)

A SURF Submission to the Scottish Government | March 2022

Overview

In November 2021, the Scottish Government published a [draft version of NPF4](#). The draft sets out the Scottish Government's long-term plan for national planning priorities including strategic objectives, regional goals, and major projects.

In the foreword, Tom Arthur – Scottish Government Minister for Public Finance, Planning and Community Wealth – explains that NPF4 is designed to, “help achieve a net zero, sustainable Scotland by 2045.” He states:

“This draft National Planning Framework sets out a vision for how our places will change in the future. It reflects priorities across Scottish Government portfolios and brings together a wide range of plans, programmes and policies.

“It explains how we will work together to build sustainable, liveable, productive and distinctive places. Once adopted, we will support its delivery collectively.”

A [formal consultation of the draft NPF4 document](#) was launched on publication. SURF responded to selected consultation questions. This paper presents a record of our submission, covering selected questions. The content is drawn from general SURF network activity, and the following consultations:

- 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.
- December 2021 and January 2022 discussions with selected SURF contacts on NPF4 content, which informed a separate [SURF evidence paper](#) for the Scottish Parliament Committee on Local Government, Housing and Planning.
- The outcomes of a digital NPF4 consultation event on 7 February 2022, convened by the Scottish Parliament's Participation and Communities Team and facilitated by representatives from SURF, Built Environment Forum Scotland, Scottish Rural Action and other partners.
- A 21 February 2022 study visit in Govan, in which SURF introduced MSPs from the Committee on Local Government, Housing and Planning to local cross-sector representatives, to learn about views and experiences on interactions with the planning system.

Part One – A National Spatial Strategy for Scotland 2045

Q1: Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

SURF supports the Scottish Government's efforts to align cross-directorate policies and strategies with net zero ambitions. The SURF network recognises climate change as the major challenge in place-based regeneration, as demonstrated in its 2021 Manifesto for Community Regeneration, and has particular concerns about the potential for a disproportionate impact on poorer people and places.

The solutions referenced in NPF4, including increasing the energy efficiency of our buildings, generating more renewable energy, and promoting active travel, are logical components of a strategy to alleviate and adapt to climate change impacts. The SURF network is also clear on the health and social benefits that can be derived from enhanced provision of high quality green and blue spaces in and around our towns and cities.

Some SURF stakeholders have queried whether NPF4 references to promote the increased density of housing in our towns and cities are superficial in nature. There is strong merit in increased density: more compact neighbourhoods are required to deliver ambitions for net zero and more 20 Minute Neighbourhoods, as they bring people and amenities together more sustainably than spread-out suburban housing estates.

For some SURF stakeholders, the current draft does not do enough to clarify how this will be achieved, especially as current market trends tend to reduce density through the demolition of high-rise apartment blocks and the increased supply of new-build homes with gardens at the edges of urban settlements.

Q2: Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

This section suggests strong alignment with SURF's two founding principles:

- Successful and sustainable regeneration is only achievable when all aspects of physical, social, economic and cultural regeneration are addressed in a holistic approach.
- The people who are the intended beneficiaries of any regeneration effort must be meaningfully involved in the process if it is to be successful in planning, implementation and maintenance.

The aspiration for comprehensive improvements in Scottish places, and on empowering local residents to influence physical, social and economic change, is therefore welcome to SURF. The range of key areas targeted for improvement, including health and wellbeing, housing quality, access to amenities and cultural opportunities, actual and perceived community safety, and reducing long-standing inequalities, is welcome. For SURF, the ultimate objective of place-based regeneration activity is to reduce poverty, and this should be stated more explicitly.

SURF also finds it helpful to see formal recognition of the additional challenges created by the pandemic, and of the opportunity to use NPF4 to create more 20 Minute Neighbourhoods, which the SURF network is enthusiastic towards, along with a similar 'living well locally' approach in rural Scotland.

Practical detail on how the 'liveable places' approach will be delivered in practice would be helpful. In SURF network consultations on NPF4, resources were cited most frequently as the key barrier. Tackling the deep-rooted social, economic and physical problems in many Scottish places require massive levels of investment, but many public sector budgets are falling in real terms, and regeneration practitioners in the SURF network feel poorly equipped to meet extensive challenges.

On the laudable objective of empowering community groups to have a stronger influence on how the places they represent are shaped, SURF has particular concerns at the lack of attention on the considerable level of additional funding this will require to deliver. 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.

Many community groups lack basic building blocks, including funding, skills, a good quality meeting place, and an inclusive structure, which are required to effectively represent a community and meaningfully influence local regeneration on the community's behalf. SURF is concerned that community groups in more affluent places, where volunteering levels are generally higher than in poorer places, are better-placed to access resources and influence local activity, leading to exacerbation of existing inequalities between places. Without additional, targeted support, the aspiration to further empower communities in disadvantaged places will not be deliverable.

There is an open question as to whether these general aspirations for more liveable places with more empowered communities qualifies as an 'approach', given the lack of clarity on how they will be realised in the current resources context.

Q3: Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

This section of NPF4 recognises the challenges of supporting our places and local economies to recover from the pandemic, and make the transition towards net zero.

The SURF network is concerned that poverty and inequality is not highlighted prominently enough in this section and throughout NPF4. Many of our deprived places have fundamental challenges, and will not become productive places without long-term regeneration support, which only some are receiving.

As most planning developments happen in places where market forces are strong and demand for land is high, the ability of NPF4 to meaningfully influence outcomes in poorer places is limited.

As previously stated, a targeted focus on community development support in our deprived places, where community capacity, skills, and confidence tend to be lower than in affluent ones, could help to achieve Community Wealth Building outcomes, and support sustainable economic development in the places with greatest need.

An increase in the delivery of good quality social housing in deprived places, where high housing need is often in evidence, was also identified as one ‘counter-market’ measure that could offset this. Prioritising the refurbishment of vacant buildings could be used to reduce the high 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 economic decline and poverty. A March 2022 report by Community Land Scotland, entitled *Urban Dwelling: A Vision for Urban Community-Led Housing in Scotland*, provides recommendations on expansion of the model. The report states that at present, “there is no support for communities to build community-led housing identified in local place plans”.

SURF stakeholders pointed out that new housing provision in deprived places should be aligned with efforts to increase local economic opportunities, including through Community Wealth Building approaches, or they will risk remaining deprived in the longer term.

Q4: Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

The recognition of the need for dedicated interventions to address past decline and inequalities is welcome. At present, many of our multiply deprived places are not safe, pleasant or welcoming, and in its 25 year history, SURF has promoted many positive case studies in which place-based regeneration initiatives in deprived communities have greatly improved these vital place qualities.

The aspirations to improve places in need of attention through interventions such as reuse of vacant and derelict land and buildings, investments in green and blue infrastructure, enhancement of the built and natural environment, and long-term place-making approaches, is welcome.

One major issue for SURF here is the capacity challenge among local government regeneration officers. They reported in SURF’s 2021 Manifesto consultations that they felt 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.

SURF consultees in NPF4 consultations expressed concerns about the range of priorities, the reality that some clash with each other (such as reaching net zero and providing new housing), and the room for interpretation and judgement by planning teams, which tend to have low capacity and a shortage of experienced staff, despite increasing demands on their time.

The scope for effective decision-making in such circumstances is limited, and the resourcing of planning departments will need to be addressed to support effective delivery of NPF4 policies.

Q5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

With regard to distinctive places, 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, including in Dumfries, Greenock and north Edinburgh.

The draft NPF4 appears to focus on a ‘market demand’ for culture, which may not support a distinctive 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.

Q6: Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

The principles align well with SURF’s 2021 Manifesto for Community Regeneration, which provided regeneration policy recommendations on climate change, land use and ownership, transport and place-based interventions. The Manifesto consultations also demonstrated widespread support in the SURF network for the 20 Minute Neighbourhood approach, the productive reuse of vacant and derelict land and buildings, and further action on community empowerment, which also feature prominently in the spatial principles.

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. SURF consultees report 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 NPF4 to enhance the prominence of the Place Principle, which is not referenced in the spatial principles, and 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.

Q18: What are your overall views on this proposed national spatial strategy?

The regional action areas are an important practical element of the strategy. SURF consultees felt their priorities, from climate change and place-making to economic development and transport infrastructure, were reflected well in the five geographies, although addressing poverty could be featured more frequently and prominently.

Some expressed the potential for confusion around regional administration and bureaucracy, with NPF4 action areas, planning authorities, City Region and Regional Growth Deals, Enterprise Agencies, and Scottish Futures Trust hub companies covering different and overlapping geographies.

Part Two – National Developments

Q20: Is the level of information in the Statements of Need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

Generally, yes, the information in this section is clear to a general reader, and the descriptions of need are generally consistent with place-based regeneration demands in many parts of Scotland.

A point previously made applies here, that the SURF network would like to see more scrutiny of whether commitments made in planning applications to provide wider community benefits, are ultimately delivered in practice.

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.

Some national developments have appeared in previous National Planning Frameworks, and have not been delivered. The Republic of Ireland’s National Planning Framework is being supported by a 10 year Capital Investment Plan, which presents a model some SURF consultees felt the Scottish Government could usefully follow.

Some argued that aspirations for Community Wealth Building and 20 Minute Neighbourhoods are not being carried through into the national developments, and value could be added by inserting additional elements into aspects of relevant developments.

Part Three – National Planning Policy

Q22: Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Yes. In its 2021 Manifesto for Community Regeneration, the SURF network identified climate change as the major challenge for our places and communities. SURF strongly supports the Scottish Government’s stated commitment, that the essential transition to a much greener economy must not be at the expense of poorer people and places.

If managed intelligently and creatively, through support from national planning policy and all other available policy levers, the intended fundamental shift could be a powerful driver for the successful regeneration of presently disconnected places and communities, via new green jobs, skills, services and enterprises.

For SURF, the interconnected dynamics of land use, transport and climate challenges, are collectively key to providing a Scotland-wide network of sustainable, productive, distinctive and liveable places.

Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Given the requirements of the Climate Change (Scotland) Act 2009, and the likelihood it will only ever be amended with more stringent targets, it is necessary to make sure Policy 2 is given primacy in all decisions and therefore in clauses a) – d) the word “should” be replaced with “must”.

Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

Policy 4 needs to be linked to how the promotion of equality can be meaningfully demonstrated both by the planning process and more importantly in the outcomes.

Q27: Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Yes, there is a good deal of value in all relevant Scottish Government strategies supporting Community Wealth Building. The SURF network has a keen enthusiasm for the concept and its potential in sustainably improving fragile local economies, to the primary benefit of the communities that live and work in them.

For many in the SURF network, supporting incremental growth of local community led, social enterprise and small business activity in a place, is a preferable economic development approach than attracting inward investment via a single large employer, which lacks stability given such an employer may leave at short notice in future.

There are, however, open questions as to what Community Wealth Building means in practice, and SURF consultees noted that NPF4 does not provide a definition beyond the general, “reflecting a people-centred approach to local economic development”.

One challenge emerging is some confusion and disagreement over what Community Wealth Building is between public bodies and across wider society, with obvious implications for planning decision-making. Some in the SURF network have pointed to examples of conventional regeneration activity, such as refurbishment of a civic building, being promoted as Community Wealth Building.

SURF is promoting Community Wealth Building pilot activity in North Ayrshire and elsewhere, and with Scottish Government support, will be establishing a national Community Wealth Building Regeneration Practice Network in mid-2022. It is hoped the outcomes of these activities will popularise the main principles behind the concept, improve understanding across regeneration sectors, and support practical delivery.

SURF is interested in a proposal by Community Land Scotland, which would enable communities to designate local Assets of Community Value. This approach is demonstrating helpful influence in England, and such a designation would not require the same resources as a Local Place Plan. As Community Land Scotland argue, designations could be a useful first step in demonstrating demand for a building of particular importance to the local community, to support a potential Community Wealth Building use should the building become vacant or derelict in future.

Q28: Do you agree that this [design, quality and place] policy will enable the planning system to promote design, quality and place?

The six qualities of successful places resonate strongly with the aspirations of SURF's stakeholders. As such, the approach as described is welcome. But 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 concerns the general language in this section 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.

At a SURF consultation event, the Chief Planner for the Scottish Government, Fiona Simpson, argued that actions assigned to "will" and "must" are formally backed by legislation, and actions assigned to "should", such as development proposals, "should be able to demonstrate how the six qualities of successful places have been incorporated into the design", effectively means they also place requirements on planning officers. Despite this explanation, SURF consultees would like to see a strengthening of the language in this section and the wider document, given that the obligations carried by softer words like "should" are not clear to the lay reader.

A linked point is that 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. 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, especially around local democracy, urban design and efforts to preserve an area's local character. SURF participants are aware it is far from easy to deliver a national strategy that makes a difference in all of our places, while providing adequate space for local decision-making.

There is, 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.

Q29: Do you agree that this [local living] policy sufficiently addresses the need to support local living?

The SURF network is a keen proponent of the 20 Minute Neighbourhood concept, which featured prominently in SURF's 2021 Manifesto, and in the 2021 Scottish Parliament election Manifestos of the SNP and Scottish Greens, and the current Programme for Government in Scotland, and the Cooperation Agreement and Shared Policy Programme by the SNP and Scottish Greens.

Both SURF and the Scottish Government are building on their strong enthusiasm for the concept by working together to investigate its application in practice in deprived places through SURF's 20 Minute Neighbourhood Regeneration Practice Network.

SURF's Practice Network has more than 200 members, many in senior regeneration roles in local government, who generally agree that the concept is an eye-catching shorthand for good planning policy, in which housing, public amenities, transport connections, and economic, education and cultural opportunities are easily accessible in well-designed urban settlements. Network activity focuses on policy and funding developments, practical guidance for practitioners, and exchanges on challenges and opportunities for implementation. Practitioners generally agree the concept is having some positive influence on policy and practice, including by generating additional interest in place-based regeneration from actors that have been more distant from it in the past. It is also easily understood by the general public, and its featuring in NPF4 adds further useful momentum, and embeds it formally in planning-related decision-making. This is a positive development.

SURF network feedback on 20 Minute Neighbourhoods in NPF4, however, note that it is generally mentioned 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 multi-partner '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 consultees 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 seek to create new employment opportunities in places people live, with easy access for communities and a choice of transport modes.

Some regeneration practitioners 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.

This section of NPF4 touches on the varied urban and local contexts in Scotland, but could be enhanced by clearly demarcating the large towns and cities in which having most essential needs met within a 20 minute walk or cycle from home is an achievable target, and the smaller towns

and rural localities in which a different approach is required. SURF consultees are also clear that social behaviour is an under-played barrier to achieving 20 Minute Neighbourhoods: wider strategies, including those encouraging active travel, town centre living, and engagement with local community, cultural, economic and educational provisions, will be needed to support NPF4 ambitions, as the Scottish Government recognises.

The most obvious omission from Policy 7 is any reference to urban density. Currently, planning officers and housing developers are describing planning proposals as 20-minute neighbourhoods that are identical to recent decades of low density urban form that are car dominated, without services or good transport connections. The international comparators in Paris, Melbourne and Portland emphasise the importance of urban density in delivering walkable neighbourhoods as does research by Centres for Cities.

The RTP1 recommends a density of at least 65 dwellings per hectare which in itself is far below those found in Paris or Barcelona superblocks but higher than that frequently delivered in significant urban extensions. Higher density is a prerequisite in delivering the aspirations of 20 minute neighbourhoods and it must be part of an urban focused Policy 7. Trying to encompass urban and rural development within the 20-minute neighbourhood concept may in actuality water it down to make it meaningless.

One final point concerns a lack of experiential data on the walkability of local places. Providing more amenities within a 20-minute walk of a residential area may not lead to the desired outcomes if the walking route is difficult, unpleasant or fraught with risk. NPF4 could be supported by data collection through qualitative surveys, to illuminate areas such as public realm and community safety in which complementary improvements can be targeted to deliver more 20 Minute Neighbourhoods.

Q30: Do you agree that this [infrastructure first] policy ensures that we make best use of existing infrastructure and take an infrastructure first approach to planning?

An infrastructure-first approach to planning is rational and desirable, and keenly supported by SURF. SURF has long argued that improved cross-sector connectivity between national, regional and local agencies and actions are required to align regeneration activity at all scales with decision-making on infrastructure. Some positive developments are emerging in this regard from City and Regional Growth Deals, and the Place Principle, but SURF consultees often report that infrastructure and regeneration plans are not well-connected in practice.

In its 2021 Regeneration Manifesto, SURF called for the production of a new National Regeneration Strategy to form a basis of an improved alignment. A new strategy should be firmly based on the subsidiarity principle and framed by clarity on the appropriate allocation of roles and resources at appropriate levels of geography, capacity and responsibility. This would better balance regeneration processes and investments in support of different and distinctive contexts, assets and aspirations. It would produce a fairer and more sustainable national framework of localised infrastructure, enterprise and exchange; and leave Scotland well-placed to benefit from all of the talents, assets, resources and energies of its people and places.

The failure of Scotland's infrastructure to adapt quickly enough to the impacts of climate change, which has a disproportionate impact on poorer people and places, was also cited as a problem by

SURF Manifesto consultees. Greater public sector project investment is needed to address this, locally, regionally and nationally. More land remediation investments would also reduce the higher development costs and the complexities of post-industrial substructure and contamination legacies present in brownfield sites, which would be sensible prime locations for new infrastructure.

Transport infrastructure, in particular, is a key area of focus for SURF. One current concern is that ongoing investment in bus lanes, walking and cycling routes, and park and ride schemes primarily benefit cities and large towns. The more varied circumstances and needs of smaller towns and rural regions should not be overlooked.

There are particular concerns about the impact of evolving trends on non-car owners in poorer parts of Scotland, outwith the bigger urban centres. SURF event participants frequently report that the decline of bus services is most keenly felt in rural areas, where other public transport options are severely limited, increasing a general reliance on cars. Declining funding for subsidised bus routes is a fundamental problem for local authorities in these areas, as many routes are not considered viable by commercial transport operators.

A general lack of consultation on transport policy is also highlighted as an area of concern, and it is welcome to see NPF4 acknowledge room for improvement in this area. SURF participants noted that consultation in the area of bus service provision is often inadequate or non-existent. This was seen by some as a consequence of the privatised provision of bus services.

Participants acknowledged that regional transport planning is complex and challenging with regard to consultation, but felt that there should be more opportunities for individuals, rather than organisations, to share their views and experiences. A full range of regional Citizens Panels was among the suggestions for alternative approaches that could allow local and regional infrastructure issues to be highlighted more effectively to national transport policy-makers.

Q31. Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

There is much to welcome in this section, including a focus on affordable housing, local demand, an incorporation of the six qualities of successful places, and alignment with place-making considerations over the longer term.

Some SURF consultees are sceptical of “statements of community benefit”, and whether they will be monitored and enforced. Consultation participants cited several local examples of benefits promised with past housing developments, which didn’t ultimately materialise, or which delivered significantly less than promised, with no apparent consequence for the developer. There was a general sense that the planning system scrutinises developments at the proposal stage, and is less concerned with – or lacks the capacity to investigate – developments mid- and post-construction.

Some views were expressed on the high number of exceptions to the statement that “new homes on land not identified for housebuilding” will not be supported. There are many circumstances in which exceptions will be granted, which could lead to them becoming so commonplace that this commitment ends up carrying no real weight in practice.

As previously stated, the SURF network would like to see the growth of community led housing in Scotland. This approach can be particularly useful in rural Scotland, where commercial housing

activity is higher risk and less commonplace, and can promote productive reuse of derelict and vacant buildings and land.

The SURF Awards for Best Practice in Community Regeneration have showcased a number of successful examples of community led housing – in Helmsdale (Highland), the Isle of Mull (Argyll & Bute), Closeburn (Dumfries & Galloway) and elsewhere – with high building standards, and that have successfully addressed local housing need, as well as regeneration and depopulation challenges.

In remote rural areas and on islands, affordable housing, particularly for families, is of critical importance to maintain a working age population and sustain vital services. Declining housing affordability can also have a highly visible negative impact on community cohesion, with long-term residents displaced as housing costs rise. Second home ownership and the rise of short-term letting businesses have also been identified as a barrier to meeting local housing needs in rural communities, which NPF4 is cognisant of.

The SURF network can see a clear distinction between exceptional housing developments, which have delivered substantial wider regeneration benefits to local communities, based on extensive consultation and partnership working, and flawed ones, which focus on expanding the housing supply in disconnected edge-of-town developments, with little regard to the local social, economic and physical infrastructure or added strategic value. While the language of NPF4 explicitly supports more of the former type, the test is, will planning applications for the latter type be refused?

The SURF Awards have promoted the effective role housing associations large and small in Scotland can play as community anchor bodies, that have deep connections to their local communities and demonstrate an extensive role in the delivery of community regeneration and local partnership activities.

The section could usefully highlight the added value to be gained by scaling up conversion of vacant buildings into housing, and of energy efficiency retrofitting. The SURF network has particular concerns about the proportion of vacant properties in poorer urban and rural Scottish communities.

Many have reported that the situation has worsened significantly throughout the pandemic, with sharp reductions in demand for vacant retail, office and hospitality premises in particular, that are unlikely to return in full in the long term. As ‘town centre living’ is a key objective in the Scottish Government’s Town Centre Action Plan, and well-suited to the 20 Minute Neighbourhood concept, SURF members believe more could and can be done to convert vacant buildings into good quality housing.

SURF contacts with particular experience in the property sector highlighted that while such conversions are far from cheap and straightforward, many can be viable with the right support. The Scottish Empty Homes Partnership made a number of recommendations in a 2019 report that could help to increase the number of empty homes conversions.

SURF has long argued that retrofitting is the most effective approach to regeneration, backed up by strong academic evidence on the extensive positive impacts for people and places. A rebalancing of investment from new-build housing to refurbishment and retrofitting, to improve the energy efficiency of older housing and civic buildings, would support reductions in fuel

poverty and carbon emissions, improvements in health and wellbeing, and the establishment of more compact 20 Minute Neighbourhoods.

Q41: Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

References to the circular economy within NPF4 are primarily within a very narrow definition in relation to materials. The reuse of all existing buildings should be identified as a fundamental part of the circular economy but it is given scant recognition in Policy 20 c) and Policy 30 e).

Regeneration of Scotland's housing stock has resulted in an immense amount of waste material and lots lost embodied carbon through wholesale demolitions, and this approach continues today. To meet the challenges of the climate emergency it is crucial the NPF4 meaningfully addresses embodied carbon as part of the circular economy and would draw your attention to the research by LETI in relation to the London Plan and Policy Env7 of the proposed *Edinburgh City Plan 2030*.

Part Four – Delivering Our Spatial Strategy

Q55: Do you have any other comments on the delivery of the spatial strategy?

In general, those consulted by SURF are in full 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.

A key thematic area that the SURF network reported as being underplayed throughout NPF4, is addressing poverty and inequality. Without taking further action towards a proactive planning system targeted on deprived places, SURF consultees are concerned that the NPF4 era is likely to remain a reactive one, based around assessing responses to planning applications, mainly in Scotland's commercial centres and high-demand residential areas. A reactive system is less helpful to poorer places, which see fewer planning applications made, and in which community groups tend to lack skills, confidence and numbers, compared to more affluent places.

A second 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.

SURF contacts reported the admirable aims of NPF4 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.

At the community level, the laudable objective of empowering communities to have a stronger influence on how the places they represent are shaped, requires a considerable level of

investment, in the context of a considerable decline in community development support since 2008.

At the local government level, regeneration officers report to SURF that budget cuts, departmental mergers, early retirements and a policy landscape with growing complexity and reporting duties, will significantly limit the wider potential of NPF4. In addition, there are particular pressures in planning departments, which have collectively suffered a 42% cut in real terms since 2009, despite an increase in planning duties and obligations. Training support for planners was also identified as a pressing resource need.

At the national level, some SURF members are concerned that national developments will not happen without a concrete delivery plan and provision of investment.

In summary, NPF4 is a well-considered strategy that aligns strongly with SURF aspirations for more successful places across Scotland; but SURF members believe that without the support of additional resources in community development, local government and national projects, the aspirations will not be realised in practice.

Derek Rankine, Policy Manager & Euan Leitch, Chief Executive | 24 March 2022 | derek@surf.scot

SURF Scotland's Regeneration Forum. Unit 15, Six Harmony Row, Glasgow, G51 3BA
Tel: 0141 440 0122 / Email: info@surf.scot / Website: www.surf.scot

SURF is a registered charity (no. SC 047 438) and a company limited by guarantee (no. SC 154 598). Registered in Scotland as 'Scotregen Ltd'. VAT reg. no. 735 2880 21.

Supported by: Creative Scotland, Glasgow City Council, Historic Environment Scotland, Museums Galleries Scotland, Scottish Enterprise, the Scottish Federation of Housing Associations, the Scottish Government, Skills Development Scotland and Wheatley Group.