

## **SURF CONSULTATION RESPONSE:**

### **Draft Infrastructure Strategy 2027-2037**

#### *About This Paper*

In January 2026, the Scottish Government published its Draft Infrastructure Strategy, which sets out a 10-year framework to guide decisions on what we build, maintain, and adapt. The strategy is intended to support net zero and environmental sustainability, inclusive economic growth, and resilient and sustainable places.

Relevant background on this consultation can be found [here](#).

Please see below SURF's response to selected questions from this consultation.

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#### **Role of the Infrastructure Strategy**

**1. Do you agree with the scope and role of the Infrastructure Strategy?**

Yes.

**2. Do you think the proposed framework, linking the 30-year Needs Assessment, 10-year Infrastructure Strategy, Spending Reviews and annual Budgets will support improved strategic planning and delivery? Are there any further improvements you want to suggest?**

Yes. Agree.

## **Infrastructure Governance Principles**

### ***3. Do any elements of the infrastructure lifecycle need to be strengthened to promote more effective infrastructure planning and delivery?***

Within Collaboration, there should be greater emphasis not just on engaging with other public sector providers, but communities themselves. Impact assessments and planning considerations are one thing; but adopting a truly collaborative and deliberative – rather than just a consultative – approach that seeks to embed community priorities into infrastructure development at an early planning stage needs to sit front and centre of the strategy.

Regarding Procurement, how will this be meaningfully integrated within wider CWB processes? A strategic intent to leverage social value into contracts is useful, but the strategy does not currently provide enough detail for how CWB will be prioritised and how it will interact with value for money. There is a tension here, as the fiscal constraints mentioned throughout the document do prevent, to an extent, the meaningful integration of CWB principles into major infrastructure development – which is often driven largely by value for money and cost considerations. In their submission, the Built Environment Forum Scotland (BEFS) further state that such cost considerations have, in the past, led to significant safety concerns and dwindling standards and have been shown partly to be responsible for disasters such as Grenfell. Re-anchoring procurement in a way that puts health, safety, but also CWB front and centre will require a completely different way of working that is not currently reflected in the strategy.

### ***4. In what areas could changes to governance or planning processes across the public sector improve the impact of the investment hierarchy?***

The investment hierarchy is useful and sets out a positive strategic direction, but the reality of preventative infrastructure maintenance and replacement / refurbishment is that it often costs significantly more. Such a strategic focus therefore does not seem to align fully with the reality of decisions that will likely need to be made. An example would be the ongoing work around the Woodside Viaduct in Glasgow. All three options currently being consulted on (removal, repair, or replace) are complex and carry with them significant risks and have implications for other infrastructure. Under the proposed strategy, the sensible decision might be to repair, but given the lifespan of such a measure (and cost implications), a replacement might be deemed more sensible – although more expensive. Questions around ageing infrastructure –

especially key assets that are used daily – are therefore more complex, and ultimately more political, than the strategy perhaps suggests.

And although communities are now being consulted on the above Woodside Viaduct proposals, this is ultimately the aftermath of a process of infrastructure development which saw communities ignored and overruled by the wider interests (i.e. the need for motorways through Glasgow). The consultation is also, by its definition, quite narrow in focus and does not consider that the wider community may want / need different solutions (i.e. a tunnel), which are not under consideration as part of the options appraisal. This raises the importance of communities not just being the recipient of engagement and consultation, but being able to co-develop and set the terms of that engagement themselves.

### **Infrastructure Themes and Enablers**

***5. Do you agree that enabling net zero and environmental sustainability, driving economic growth, and building resilient places continue to be the right outcomes to guide infrastructure investment over the next decade?***

Yes.

***6. Are the three proposed enablers, public assets, place-making and private investment, sufficient to deliver the Strategy's outcomes? Are there other enablers we should consider instead/additionally?***

No. As SCA (Scottish Communities Alliance, of which SURF is a member) note in their submission to this consultation, a fourth enabler around community led delivery and community ownership should be added. Previous concerns around the meaningful integration of CWB would be addressed by such an enabler and a focus on community capacity and development. This also helps ensure that, where possible, infrastructure can be community assets, rather than national or regional assets that happen to sit (or pass through) communities.

***7. What mechanisms or approaches should the Infrastructure Strategy adopt to ensure that critical cross-cutting priorities, such as housing delivery, regional economic development, and natural infrastructure are systematically embedded in investment planning and decision making?***

A national Infrastructure Strategy must integrate community aspirations and needs – through, for example, Community Action Plans and Local Place Plans. The potential overlap between such plans also raises a wider point about the advantages of rationalising the planscape – which can lead to one overriding plan for one community, which can then be usefully integrated into a national or regional strategy. Although housing delivery, for example, is increasingly viewed from a regional scale – with SHIPs acting as an anchoring strategy and housing needs increasingly tailored to a local context – housing ultimately always takes place in communities. We have an unfortunate history of doing things to communities, rather than with them.

Crucially, if such mechanisms are properly integrated, it is important to acknowledge the inequities involved in such processes. More often than not, it is well-resourced communities that have both the community capacity, knowledge, time, and resources to create CAPs or LPPs, which means the most disadvantaged communities often have no way of influencing planning processes or policy. This can only be alleviated by properly funding CAPs and LPPs – something that SURF has called for as part of its Manifesto for Regeneration – by focusing funding on the most disadvantaged communities.

***8. Are there any findings from the Scottish Future's Trust Needs Assessment (perhaps from drivers of change, cross-cutting themes or enablers) that we should more fully integrate into this 10-year Infrastructure Strategy?***

***9. Do you support the proposal that infrastructure investment is more directly driven by the priorities of places across Scotland?***

Yes, strongly. The question is more around how this will be effectively and democratically operationalised so that places themselves feel empowered and embedded in infrastructure investment and development. See the above point around community input into planning and policy through CAPs and LPPs.

***10. Are the proposed principles, national spatial priorities and place partnerships, the right ones to guide a place-based approach? Are there other principles we should consider?***

Yes.

**11. Do you agree with the Scottish Government's proposal to empower communities to play a more active role in infrastructure decision making? What mechanisms would best support meaningful community involvement and help to maximise local social benefits?**

Yes – but more detail and work to support communities is required for it to be meaningful. LPPs, for example, are mentioned – but the development and uptake of LPPs has been fairly uneven across Scotland. If such instruments are to be used on an ongoing basis to develop infrastructure, then funding should be provided by Scottish Government to ensure that every single place has an LPP – or at least the opportunity to do so. A Community Action Plan would also suffice – although they do not currently have the same statutory footing as an LPP, which is something that could also be addressed in future.

Furthermore, the above process should really be the starting point – rather than being seen as the endpoint of community engagement. As SCA note in their submission to this consultation, communities should be involved not just in identifying and / or setting priorities through planning processes, but negotiating the development and / or choices made once infrastructure needs are selected. This process should be ongoing, with communities having a meaningful seat at the table. SURF would view Community Councils as useful vehicles for that ongoing engagement – although it should be noted that many are already stretched, underresourced, and that many of the most disadvantaged areas do not have CCs. Local landscapes vary significantly – some have active development trusts, some have community councils, or housing associations that play a key anchor role, some have all, and others have none. It is crucial to develop a model of engagement and involvement that can be flexible and place-based, rather than adopting a rigid view of how communities should feed into these wider processes.

**12. Do you believe the current landscape of local and regional partnerships (e.g. Community Planning Partnerships, Regional Economic Partnerships, HubCos, Regional Adaptation Partnerships) provides an effective framework for delivering place-based infrastructure investment? Please explain your answer, including any suggestions for improvement of existing structures.**

No. Mainly because in their current form, not enough meaningful influence and importance rests with communities, who are often seen as contributing to the above partnerships, rather than empowered to lead their own. Community Action Plans

should therefore be given more importance, and can ensure that community priorities – beyond spatial elements and / or wider planning considerations – are integrated into thinking from the outset.

At the moment, if communities do not take it upon themselves to articulate their own community aspirations – and consider, for example, the wider infrastructure landscape, something which CAPs and LPPs do not by their nature encourage – then local priorities are by extension not factored into regional priorities and filtered through into national decision-making. This is a key issue currently in the strategy, in that it presumes these community discussions and priorities are occurring everywhere in the same way. We know for a fact this is not the case, with disadvantaged communities often missing out on the opportunity to participate in this process, which reinforces the age-old pattern of major developments happening without the consent and buy-in of local people. These foundational priorities must, in short, be made more explicit if they are to be meaningfully considered at a regional and then national scale. If not, we risk a process that works well in areas with civic systems and community infrastructure already in place, but fails communities that – primarily through deprivation – do not have such structures.

The question then also becomes: whose responsibility is it to ensure that such community conversations and planning processes are occurring, if they are not already taking place? Where does that duty lie? If it lies squarely and only with the community, that is problematic in an area of socio-economic deprivation.

### **Enabling Private Infrastructure**

***13. Are there additional sectors or opportunities that should be considered for strategic investment to support economic growth and maximise opportunities for longer-term growth?***

**14. To make the most of the strategic opportunities in renewables, housing, and natural capital, what will the economy need from our infrastructure to grow and thrive up to 2037?**

Although multi-year funding for housing is referenced in the strategy as helpful in the forward planning of key infrastructure, it should be noted that much of the infrastructure costs for housing development inevitably lands with local authorities. This has become an increasingly unsustainable situation which, in many instances, is placing additional pressures on the delivery of affordable housing and can lead to

developments which do not contain all the relevant amenities or infrastructure that new communities need to thrive. A more realistic understanding of how infrastructure costs are developing over time – and how this potentially interacts with affordable grant levels, which are still below what is needed to meet demand – would help clarify what the mixture of finance should be between public and private stakeholders, especially with regard to housing. Removing the speculative nature of land, for example, is a step that would have a considerable impact on the funding available for good infrastructure, as much of the current ‘value’ (and therefore ‘cost’) of developments lies predominantly in the undeveloped land itself, which then require significant public sector work to realise its potential. Given the scarcity of useable land in areas which already have ample infrastructure (i.e. dense urban areas, or around town centres), this issue will only become more pressing as new residential developments inevitably sprawl outwards to meet demand.

It should also be noted that the cost of infrastructure in rural and island areas is particularly prohibitive for private investment and therefore requires significantly higher levels of public subsidy and / or support. The well-documented market failure in relation to key assets like housing is more prevalent in those areas, and communities are often left to fund for themselves – with community led housing funds not necessarily including relevant funding and / or budget for necessary infrastructure improvements that must accompany new housing in these remote areas. The regional disparity in costs – and how value for money is therefore calculated – remains a challenge that the strategy would do well to address head on.

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End of SURF’s response

Augustijn van Gaalen, Policy & Advocacy Manager, May 2026

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