We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

☐ **Yes**

☐ No

CULTURE COUNTS

Call for Ideas
National Planning Framework 4

Contents

Culture Counts Submission
Call for Ideas
National Planning Framework 4

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1 Planning (Scotland) Act

1.0 In drafting the Planning Scotland Bill 2019; Scottish Ministers agreed that culture be included for the purposes of preparing and revising the National Planning Framework.

> *Reference 1*
> *Planning (Scotland) Act; Page 4, Line 38,*
> *The National Planning Framework:*
> *(1) For the purposes of assisting the Scottish Ministers in preparing or revising the **National Planning Framework***
> *(2) The matters are—*
> *(a) the principal physical, **cultural**, economic, social, built heritage and environmental characteristics of the area,*

The Planning (Scotland) Act overall has five references to 'cultural'; two to five listed below:
Page 11, Line 19
The Town and Country Planning (Scotland) Act 1997 is amended as follows:
(iii) in paragraph (a), after "physical," insert "cultural,",
Page 11, Line 36
The Town and Country Planning (Scotland) Act 1997 is amended as follows:
(v) after paragraph (c) insert—
(ch) the desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular, but not limited to, live music venues) in the district,"
Page 43, Line 8
Conditional grant of planning permission: noise-sensitive developments:
Without prejudice to the generality of section 41(1), a planning authority—
(a) must, when considering under section 37 whether to grant planning permission for a noise-sensitive development subject to conditions, take 5 particular account of whether the development includes sufficient measures to mitigate, minimise or manage the effect of noise between the development and any existing cultural venues or facilities (including in particular, but not limited to, live music venues), or dwellings or businesses in the vicinity of the development, and
(b) may not, as a condition of granting planning permission for a noise-sensitive development, impose on a noise source additional costs relating to acoustic design measures to mitigate, minimise or manage the effects of noise.".
Page 68, Line 11Forestry and Woodland Strategy:
(a) Identify woodlands of high nature conservation value in the planning authority's area, and
(b) Set out the planning authority's policies and proposals in their area, as to—
(iv) the expansion of woodlands of a range of types to provide multiple 10 benefits to the physical, cultural, economic, social and environmental characteristics of the area.

2.0 Introduction and Background

2.1 When the bill was passed Culture Counts put together a National Planning Framework (NPF4) cultural working group comprised of eighteen cultural organisations from across the UK. A small group of representatives met with the National Planning Framework 4 team in November 2019 in Edinburgh to discuss cultural themes; including economic contribution, attractions and tourism, place standard and human requirements for wellbeing, agent of change, cultural buildings, vibrancy-day and night-time economy. Members of the wider

working group were able to attend some of the consultation workshops before they had to close due to Covid-19.

2.2 Since the publication of the National Planning Framework 3; Culture Counts has produced an interactive digital tool [Useful Facts](). Useful Facts is an open-source bank of research that helps us to quickly and easily understand how culture contributes to sustainable economic development goals. We hope that our new digital tool is useful for drafting NPF4.

2.3 This submission is informed by discussions with our members, and from reviewing cultural research, international agreements and conventions into the value of culture to climate, people, place, work and delivery. This submission aims to show policy-makers where the cross-policy connections to Culture are; within the themes for NPF4 as set out by the Scottish Government.

2.4 We have considered the following key documents within our submission:

- The Planning (Scotland) Act 2019
- Scottish Government Scottish Planning Policy 2014 and NPF 3 2014
- Climate Ready Scotland, Second Scottish Climate Change, Adaptation Programme 2019-2024
- Scotland's Economic Strategy 2015
- Scottish Government Strategy Our Place in Time 2014
- Skills Development Scotland Skills Investment Plan Historic Environment 2019
- Scottish Government Creative Industries Policy Statement 2019
- Core Cities Inquiry 2019
- Scottish Government National Performance Framework 2018
- UNESCO Convention on the Protection and Promotion of the Diversity of Cultural Expressions 2005
- Culture Strategy for Scotland 2020

2.5   Definitions
- What do we mean by the-arts? 'Arts' means public participation in the arts, citizens produce work and actively exercise (in the wider sense) the (UN) right to freedom of expression. It's skilled and imaginative making, writing, painting, showing, sharing, performance of music, acting, dancing etc.

- What do we mean by cultural? 'Cultural' means supporting experimentation, habits, traditions, and beliefs of all society.

- What do we mean by Creative Industries? 'Creative Industries' means the production, distribution and exploitation of creative-work for financial gain, accelerating the cultural sector's significant contribution to the Scottish economy.

- What do we mean by the Cultural Eco-System? The Arts, Culture and the Creative Industries are inextricably linked. Arts are the foundation of the creative industries, a

society must invest in the arts for human wellbeing and to support the creative industries. For example: Children learn to read in school and are inspired by authors, they can access books equally though libraries (cultural buildings-designed for all); they can imagine their own stories and become novelists or screen-writers; they grow up and work in the creative industries; having been supported by a planning system that understands the value of the cultural eco-system and how that contributes to a sustainable economy.

- What do we mean by the Historic Environment? The historic environment is a diverse, complex and culturally important sector spanning several broad market areas. These include; historic and listed buildings and sites; the built environment; conservation areas; gardens/designed landscapes; tourism and hospitality; historic landscapes, libraries, museums and galleries.

3   Overall Vision

3.0 A place of thriving arts, culture and creative industries:

Scotland has three cities in the UNESCO creative cities network: Edinburgh City of Literature, Dundee City of Design, and Glasgow City of Music, and the Outer Hebrides has been designated World Craft City status.

Building on a strong reputation and legacy the arts, culture and creative industries will be at the heart of Scotland's future, providing opportunities and jobs, bringing our communities together, improving cultural well-being and promoting our nation across the globe.

3.1 Strategy for new development:

New development must promote wellbeing and ensure our communities have access to the services, facilities and infrastructure they need to thrive, including sufficient community, cultural, educational, health recreational and sporting provision along with access to nature and open space.

3.2 Town centres:

We would suggest retaining a version of the policy already in place within Scottish Planning Policy as this provides a framework by which arts and cultural venues are promoted; as follows:

"Planning for town centres should be flexible and proactive, enabling a wide range of uses which bring people into town centres. The planning system should: apply a town centre first policy when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities; encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening; ensure development plans, decision-making and monitoring support successful town centres".

Culture Counts and Creative Scotland contributed to a consultation in 2019 for the development of the new Town Centres Toolkit through Scotland's Towns. The Town Centre Toolkit includes useful case studies into the value of culture to communities and we hope this can be reflected in the National Planning Framework 4.

3.3 Specific cultural policy:

The role and value of the arts, culture and creative industries in supporting positive economic and social benefits is recognised. Local Development Plans should plan positively for the cultural eco-system, for cultural venues and creative industries, identify opportunities to meet the cultural needs of local people and guard against unnecessary loss of valued cultural spaces and services. Opportunities for new arts and cultural venues will be supported and development must not result in the loss of valued social, cultural or creative industries facilities without compelling evidence the community no longer requires them.

3.4 Agent of Change:

On submission of plans; developers must evidence prior consultation and agreement with cultural venues for the management of noise; as set out in the agent of change principle.

3.5 The National Performance Framework:

The Outcome for Culture reads: '**We are creative and our vibrant and diverse cultures are expressed and enjoyed widely'**. It's important that our places and systems allow all people to create, share, understand, express and enjoy.

Consultation Themes

Climate

4.0   **Climate**: What development will we need to address climate change?

The arts, culture and creative industries can contribute to climate change by expressing, echoing, innovating, reflecting and influencing solutions to climate change.

4.1 To truly begin to address climate change we need to be able to innovate, to build a picture of what doing things differently looks like; to imagine things differently. The arts, culture and creative industries can work in partnership with decision makers to support the process of imagining things differently. In order to so this, they need to be part of the conversation; which is why connecting learning planning networks and the inclusion of the sector as a statutory consultees is vital.

4.2 Creative Carbon Scotland produce an annual Green Arts Conference which showcases how and why Scotland's cultural sector is responding to the climate and environmental crisis. Through exciting speakers, interactive workshops and community networking it provides a rare opportunity to share the innovative steps being taken to reduce the environmental impact of the arts and understand their crucial role in creating a more sustainable Scotland. The 2019 conference was sold out.

4.3 Creative Industries are reinventing services for consumers to help reduce carbon for example: Beatrice Mocci who is a resident entrepreneur at the Edinburgh based school of informatics founded 'Statements' an online source of ethical and sustainable fashion and beauty products.

4.4 Snapshot from 'Statements' website:

"You no longer have to make a choice between shopping ethically and looking however you please. STATEMENTS is a curated online marketplace introducing you to clothes that won't just last longer in your wardrobes; they help the planet last longer, too."

4.5 A Culture Strategy for Scotland (page 34), states:

Climate change is a defining challenge of our age with major implications for the ways in which people live. The transition to net-zero in Scotland will require transformational change across society. Culture is integral to our ways of life, connecting people to place and helping them to understand and relate to environmental challenges. Culture thus offers potential for galvanising climate action and could play a major role in influencing the widespread behavioural change that will be required to meet our ambitious targets.

People

5.0   How can planning best support our quality of life, health and wellbeing in the future?

To support a sustainable economic cultural eco-system (as described above) National Planning Framework 4 (NPF4) and Scottish Planning Policy (SPP) should be clear that wellbeing is valued on an equal basis with economic growth by placing wellbeing within the core values statement.

For example, the service should 'Play a key role in facilitating sustainable health and wellbeing particularly; partnerships that strengthen capacity and resilience within communities'. This would demonstrate and promote the understanding that wellbeing is a requirement for growth.

5.1   Incorporating a Culture Strategy for Scotland

The Culture Strategy for Scotland was published on the 28th February 2020. We've drawn out the sections of the strategy which we think could neatly align with the NPF4 & SPP.

> *The vision for the Culture Strategy for Scotland is:*
>
> *Scotland is a **place** where culture is valued, protected and nurtured. Culture is woven through everyday life, shapes and is shaped by society, and its transformative potential is experienced by everyone. Scotland's rich cultural heritage and creativity of today is inspired by people and **place**, enlivens every community and is celebrated around the world.*

5.2 The Culture Strategy (Page 32) states.

"We will also work across the Scottish Government to create strategic cross-policy compacts to deliver co-ordinated approaches to realising shared policy outcomes through culture in key policy areas such as health and wellbeing, community empowerment and regeneration; exploring options for leadership, resource sharing, compatible planning and complementarity policies."

Culture Counts believes that it's vital to create policy compacts to realise cross-policy outcomes; and we would be pleased to assist the Scottish Government to produce this work.

5.3 The Culture Strategy for Scotland is broken down in three main themes:

- **Strengthening** Culture: Sustaining and nurturing culture to flourish and to evolve as a diverse, positive force in society, across all of Scotland.
- **Transforming** through Culture: Demonstrating that culture is central to Scotland's wellbeing and cultural, social, economic and environmental prosperity.
- **Empowering** through Culture: Celebrating culture as part of every community; essential to our lives and wellbeing.

5.4 There are key aims of the culture strategy that relate to **people**; as follows:

- (Page 53) Value, trust and support creative **people** – for their unique and vital contribution to society and the economy
- (Page 55) Extend opportunities that enable **people** to take part in culture throughout their lives

5.5 The culture strategy (page 43) sets out a Scottish Government aim to:

- Recognise each community's own local cultures in generating a distinct sense of place, identity and confidence.

  The Scottish Government will achieve this aim by:

- Working in partnership with culture trusts and local authorities, including in Community Planning Partnerships local networks and CoSLA to realise local outcomes across Scotland.

5.6 The Culture Strategy (page 47) states:

*Culture lies at the heart of **successful place-making**, drawing on our natural and cultural heritage, to create shared visions for the future. Cultural activities are an important economic driver in their own right, as well as increasing the interest and appeal of our built environments. By taking cultural impacts into account at an early stage, the planning system can sustain and enhance our cultural offerings.*

Policy-makers can access academic research into the impact of culture via our online open-source digital tool Useful Facts.

Work

6.0 Work: What does planning need to do to enable an economy that benefits everyone?

Culture Counts welcomed the publication of the Cultural Cities Inquiry in 2019; the purpose of the inquiry was to consider how to radically increase the ability of cities to use culture as a driver for inclusive growth.

We have highlighted below some information which we hope will assist policy-makers in consideration of how to support planning for work through arts, culture and creative industries.

Scotland has six cities; and cultural compacts for all **Scotland's city regions** are key to enabling cultural contributions to sustainable growth. We hope this can be supported through NPF4 and SPP.

6.1 The **main recommendations** from the Cultural Cities Inquiry are as follows:

Leadership
Strong and sustained collaboration between strategic city partners can support collective, coordinated action to grow a city's cultural ecosystem, to drive lasting social and economic benefits. Cities with a clear vision for culture supported by business, city authorities, education and the cultural sector can align activity and funding and leverage new resources.

Investment
Culture can create compelling investment propositions delivering cultural, social, economic and financial returns for the city. By linking cultural projects to civic outcomes, including urban regeneration, growth of the creative and digital industries, health and wellbeing, and tourism, cities and cultural organisations can access new public and private streams of investment.

Talent
For culture to release the creative potential of all people in our cities, the cultural workforce should better reflect the diversity of our communities, and cities could be more strategic about nurturing talent for creative industries. Greater coordination at city level can drive coordinated development programmes for creative talent.

Place
Cultural activity has a powerful capacity to catalyse economic development, and spur the growth of creative and digital industries. Publically-owned cultural properties can be strategic assets for cities in driving regeneration. But regeneration can lead to displacement of culture, and civic returns are not always optimised. Portfolio approaches to asset management can help sustain and enhance a city's cultural ecosystem, capturing and recycling value into the sector, the city and communities.

6.2 <u>Statutory Consultees</u>

How a cultural compact works (Cultural Cities Inquiry page 34)

- *Cultural organisations and funding agencies must be involved, but also a wide range of public, private and third sector bodies, including but not limited to local and / or Combined Authorities; NHS Trusts; schools, Further Education and Universities; LEPs or equivalent planning partnerships, Chambers of Commerce and BIDs; Housing Associations; Councils for Voluntary Organisations and their members; community groups; artists groups an collectives; businesses and landowners.*

In order for Scotland's Regions to make the most of the cultural sector; **statutory consultees** in planning must include for example: cultural agencies such as Creative Scotland; Historic Environment Scotland; BEMIS; Highlands and Islands Enterprise; South of Scotland Development Agency; Creative Carbon Scotland; Scottish Enterprise; Scottish Development International and Skills Development Scotland. Statutory consultees ensure that consultations are well informed and do not overlook some important considerations.

6.3 Cultural Cities Inquiry Planning Notes

- The role for Governments (page 25)

  *Provide a toolkit to support Compacts in assessing viability of options for portfolio management of cultural assets, bringing together public bodies and other agencies with an active interest in this field. **Review the National Planning Policy Framework** to ensure it supports and incentivises this activity.*

- Business Plan: Delivery and Outcomes (page 35)

*Local Plans and planning gain: reflecting the Compact's priorities within Local Plans and using planning gain in a coordinated manner to resource culture and the Compacts' Plan. This could include securing space for cultural production and performance and a proactive '**meanwhile use' policy** for disused buildings.*

- Place: Recommendation 8 (page 51)

*Compacts should also ensure that cultural activity is **prioritised within city spatial plans,** and that planning policy, licensing and business rates are in alignment to help enhance the cultural estate.*

- Creative Enterprise Zones London (page 54)

Policy – develop Local Plans with pro-culture policies in planning, housing, business development, technology, super-fast broadband and infrastructure, and support local business rates relief policies. Community – create socially-inclusive places and strengthen links with marginalised communities and education providers so that young and local people can access new jobs within the CEZ.

6.4 UK Industrial Strategy – Cultural Development Fund

https://www.gov.uk/government/news/five-areas-to-share-20-million-to-unleash-creativity-across-the-nation

In early 2019 as part of the Creative Industries Sector Deal the Department for Culture Media and Sport announced a £20million Cultural Development Fund for England and Wales; this was administered by Arts Council England.

The investment in culture, heritage and creative industries was designed to help drive economic growth. NPF4 drafters may be interested in where funds were invested and you can find out more here: https://www.bbc.co.uk/news/entertainment-arts-46906485

6.5 Scotland's Economic Strategy 2015

Scotland has six economic growth sectors:

- Food & Drink (including agriculture & fisheries)

- **Creative Industries** (including digital)

- Sustainable Tourism

- Energy (including renewables)

- Financial & Business Services

- Life Sciences

Creative Industries, Sustainable Tourism and Food & Drink are all inter-linked. For example food companies will work with graphic designers and advertising to produce marketing materials. Tourists are often visiting in order to attend a cultural festival, event or to spend time in the historic environment.

6.6 Scotland's Economic Strategy 2015 (page 42) states:

We will continue to target our interventions at sectors and companies where we have a distinct comparative advantage. Scotland has strengths in a diverse range of sectors including Food and Drink, Financial and Business Services, Life Sciences, Energy, Tourism and Creative Industries. We will continue our focus on these key sectors.

6.7   Creative Industries Statistics

Source: Scottish Government growth sector statistics July 2019

- 77,140 are employed in Creative Industries in Scotland (this figure does not include self-employed people; most producers i.e. artists, musicians, actors and writers are self-employed).
- Approximate Gross Value Added £4.9billion 2017
- There were 1845 business births (VAT registered) in Creative Industries in Scotland in 2017, there was 2090 in 2016
- 84.5% of adults attended a cultural activity in the last 12 months (2017)

6.7   Our Place in Time 2015

Our Place in Time is a Scottish Government strategy for the historic environment.

Statistic on the economic impact of the sector are provided on page 4:

- The historic environment is estimated to contribute in excess of £2.3 billion (2.6%) to Scotland's national gross value added (GVA) and to account for 2.5% of Scotland's total employment, supporting 60,000 FTE employees which includes seasonal employment.

Case Study (page 22): The historic environment brings social and economic benefits to communities.

- Page 22 provides a case study into a historical environment regeneration project in Campbeltown. Over the period studied by Jura Consultants £6.7 million of Historic Scotland funding attracted a further £18.6 million of investment from other sources.

6.8   Skills Development Scotland

A Skills Investment Plan for the Historic Environment was recently published. The plan includes an action plan which aims to ensure that the growth of the historic environment is not slowed down by lack of access to skilled workers. The action plan includes an aim to provide a strategic skills framework around which all stakeholders will deliver resources.

Place

7. Place: How can planning improve and strengthen the special character of our places?

Culture strengthens the special character of our places by creating a unique vibrancy, by producing and delivering major events and attractions, by caring for, experiencing and protecting the historic, built and natural environment.

The culture of a place is what makes it unique and that's what makes it attractive or not to those who live there and to those of visit. For example: East Kilbride has a major retail shopping area which attracts visitors from the surrounding areas. Locals visit the shopping malls too; though they also value the old-town ('the village') which has cobbled streets, old churches, a theatre (established in 1978), an arts centre (established in 1994), bars, restaurants and various small industrial units for independent local businesses.

7.1 Planning can improve and strengthen the special character of our places by

- Highlighting the varied social, economic and cultural benefits of the arts, culture and creative industries
- Ensuring that effective policy compacts are in place;
- Ensuring appropriate statutory consultees are part of decision making networks and frameworks
- Incorporate design-thinking

7.2 A Culture Strategy for Scotland 2019

As above the vision for the strategy is:

*Scotland is a **place** where culture is valued, protected and nurtured. Culture is woven through everyday life, shapes and is shaped by society, and its transformative potential is experienced by everyone. Scotland's rich cultural heritage and creativity of today is inspired by people and **place**, enlivens every community and is celebrated around the world.*

7.3 Scottish Government Creative Industries Policy Statement 2019; information for planning include:

Strengthening Importance of Place (page 7):

- *Creative businesses are often embedded in a network in a particular area and thrive as a result of the connections, collaborations and sharing of resources. Creative businesses often draw on distinct place-based identities in the products or services they provide, making the most of local culture, history and local distinctiveness. Building on connections to neighbourhoods, communities or regions adds to the attractiveness and competitiveness of businesses.*

- *Working with our partners we encourage the development and strengthening of creative clusters, local collaborations, social enterprise and cross-sectorial networks and eco-systems. We support place building through City Region and Regional Growth Deals and Creative Scotland's Place Partnerships. We have also provided extra funding to libraries to create vibrant new collaborative workspaces around the country.*

8 High Level Outcomes

8.0 Improving the health and well-being of people living in Scotland

We have included as an Annex to this submission a copy of Cultural Connections. Culture Counts drafted Cultural Connections for the team leading the Place Standard Tool review. The document outlines how culture could be highlighted within the tool in terms of how it contributes to health and wellbeing through access to culture.

8.1 Increasing the population of rural areas of Scotland

- The availability of work and the opportunity to learn skills or to take part in apprenticeship opportunities have to be available across Scotland; otherwise people will always leave rural areas for the bigger town and cities. The cultural sector spans across various careers many of which can be undertaken online; such as animation and graphic design. The lack of digital connectivity still holds some areas back and if the growth and benefits of the creative industries are to be realised across Scotland, this needs to be solved as a matter of urgency.

8.2 Improving equality and eliminating discrimination

- The cultural sector can be a vehicle to improve understanding and raise awareness in communities of equalities issues. There are many opportunities for this storytelling awareness raising work to happen as long as an improvement in equalities is a high level aim across organisations. An improvement indicator may be for example: More people from areas of multiple deprivation accessing university or apprenticeships.

- The cultural sector can be used as a way to tell stories about discrimination and improve understanding of issues. Opportunities for community collaboration projects which involve cultural sharing enables better community understanding.

- To achieve improvements in equalities and to eliminate discrimination; organisations such as BEMIS and the Coalition for Racial Equality and Rights need to be involved in the planning design-thinking stages and should be listed statutory consultees at a strategic level.