

**CONSULTATION RESPONSE
NATIONAL PLANNING FRAMEWORK 4: CALL FOR IDEAS
APRIL 2020**

PAS (www.pas.org.uk) is Scotland's leading place and active citizenship charity. We support a planning system that is inclusive, positive and innovative, where individuals and communities help shape the future of their place. We help individuals and community groups to get involved in the planning system in an impartial, open and inclusive way.

We provide skills training and support for community groups, planners, elected members and public bodies, as well as to seldom-heard groups who often cannot readily engage in the planning system. In particular, we support community organisations to develop and deliver their own aspirations for place through local place plans. Our Advice Service offers a free, impartial and confidential planning advice service, provided by our specialist volunteers, all of whom are chartered planners. We are a volunteer-led organisation supported by a network of specialist volunteers, primarily planners but also a range of other professionals from across the built environment sector. PAS has held Investing in Volunteers status continuously since 2008.

INTRODUCTION

National Planning Framework 4 (NPF4) is a highly significant opportunity to re-focus the Scottish planning system. The global climate emergency, together with social and environmental challenges which exist in Scotland, mean that re-focusing and increasing public trust in planning is a necessity. The Planning (Scotland) Act provides for this to happen through the enhanced influence it affords to NPF4 and other provisions such as local place plans.

Scotland has high levels of inequality in terms of health, income and places. Planning at national level has a key role to play in addressing this. Places, communities, and homes are fundamental factors in how people interact with the outcomes of the planning system. Where and how people live – and the kind of places our planning system creates - have key impacts on equality, health, and wellbeing. When people have a voice in the future development of their place, this can enhance wellbeing, as well as identify actions to create better places.

It is clear that local development plan allocations and planning consents alone are not delivering sufficient homes in Scotland. Furthermore, they are (with some notable exceptions) not creating new places which meet the design aspirations set out in Scottish Planning Policy and Designing Streets. The new provisions for NPF4 to set home building targets and core planning policies offer the opportunity to set a policy context to address these issues. The planning system alone cannot change this situation and a collaborative approach is needed.

An NPF4 which recognises the climate emergency, together with the new purpose of planning and Scottish Government policy goal of inclusive economic growth, would be a key statement in demonstrating the ethos of planning to operate in the public interest and re-invigorating Scotland's approach to sustainable development.

PAS believes that our impartial role can help deliver the aims of NPF4. This could encompass explaining planning processes, bringing different communities and stakeholders together, mediation, facilitating local communities to engage with their places, and promoting the involvement of young people and other seldom-heard groups. This will be underpinned by our ethos of enabling volunteering within the planning profession and translating local community activity into action plans.

1. WHAT DEVELOPMENT WILL WE NEED TO ADDRESS CLIMATE CHANGE?

- **Vision statement: A Scottish planning system refocused to address climate emergency through an integrated policy approach and to encourage local voluntary action to increase community resilience.**

NPF4 should be grounded in the requirement for planning processes and outcomes to address climate change. It should set a national narrative and policy direction which will influence the design and development of new places to help Scotland meet the 2045 carbon emission targets.

The collaborative and cross-disciplinary approach set out in the Scottish Government's Place Principle policy should be embedded within NPF4 as part of the approach to placemaking and associated service delivery. This will require planning, transport, energy and social and environmental policy to work in a joined-up manner.

NPF4 should promote a collaborative co-production approach. It should recognise that actions taken by communities can, collectively, have global impact in addressing climate change. NPF4's narrative should recognise that local place plans provide a statutory framework for this to happen, alongside increasing community resilience. Young people are increasingly engaged with the challenges presented by the climate emergency and need to be included in this conversation.

Circular economy and zero-waste principles should also be embedded in the narrative and policy context set by NPF4. Construction waste represents 40% of UK-wide carbon emissions and this needs to be addressed in terms of the procurement and design of all new development. NPF4 should enable planning decisions to be made which reduce carbon emissions and demonstrate energy efficiency. There should be a policy approach to repair and re-use existing buildings before new development, and to deliver more flexible/adaptable and durable developments, both of which will have a lower carbon impact. It could be a requirement that the carbon footprint of any new development proposal is assessed as a key aspect of planning decision making.

The siting and design of new places and changes to existing places can fundamentally influence human behaviour, and should be grounded in promoting active and sustainable travel. This approach should be embedded in the narrative and policies of NPF4. It should also be an aspiration that local facilities and amenities can be accessed easily and sustainably. Provision for local food growing should also be a standard aspect of new housing developments.

The majority of land allocated in local development plans is for the new homes required to meet Scotland's housing shortage. NPF4 should ask local authorities and developers to strive to deliver new housing developments which will contribute to addressing climate change. They should be created with a distinctive placemaking approach and with key infrastructure installed as early as possible. NPF4 should recommend that guidance about design, layout and density should be provided at local level and that local authorities consider how to apply this effectively. Housing delivery is only one part of the equation - it is the type, quality and variety of new homes, and the new places that are created, that will impact on local communities and new residents.

NPF4 should set in place measures to incentivise new development on brownfield land - and where appropriate - vacant and derelict land. Alongside this, it should set a narrative and policy to prioritise bringing empty homes back into use – this should be implemented by Scottish Government in partnership with relevant agencies.

2. HOW CAN PLANNING BEST SUPPORT OUR QUALITY OF LIFE, HEALTH AND WELLBEING IN THE FUTURE?

➤ **Vision statement: A Scottish planning system re-focused on a new kind of placemaking delivering equity, wellbeing and sociability.**

NPF4 should set the policy context for a new approach to placemaking, predicated on wellbeing and creating healthy places, and acknowledging the impact of planning in supporting good physical and mental health. Outcomes of the planning system should be places which address changing population demographics, improve air quality, promote active travel and physical activity, and promote sociability. Loneliness and isolation are increasing societal problems, but these can be addressed in part by good planning and placemaking.

NPF4 should demonstrate in its narrative that planning can facilitate inclusive and intergenerational debate at national and local level about quality of life, health and wellbeing, alongside its blunter role in setting targets for new homes and determining planning applications. This debate should include engagement-focused approaches to preparing local development plans, development proposals or local place plans.

Places designed or reconfigured to promote sociability should include features that encourage informal social interaction to happen on a day-to-day basis. These could include public green space, small open spaces, shops, community halls, flexible community spaces, multi-faith spaces, schools, play parks, defined walking and cycling routes, allotments and community gardens.

NPF4 should set an aim of creating intergenerational places which include homes of different sizes (studios to large family homes) and tenures, homes offering design flexibility, and facilities to meet the needs of all generations. Self-build, co-housing, live-work homes, homes aimed at young people, 'whole-life' homes (the design of which can change flexibly over the lifetime of an inhabitant) should be encouraged and made easier to deliver. Private rental sector and middle market rental accommodation also need to be included in this debate. PAS has facilitated a post asset transfer engagement process to create an intergenerational centre in a primary school building, an approach which could be replicated around Scotland and would help create more inclusive places and resilient communities.

Gypsy/Travellers in Scotland experience low health outcomes which are often related to the siting and quality of the places where they live, and experience systemic barriers to engaging with planning. NPF4 should address this matter as a national priority while also recognising the proactive work done by some local authorities to address this, some of which has been in collaborations with PAS.

Rural communities often experience shortages of suitable and affordable homes. This can impact on elderly people wishing to downsize and young people who wish to remain in their local area. Land ownership may also restrict the ability to build new homes. The experience of PAS in leading engagement-based projects in rural areas (such as community land use plans for Applecross and Rum) suggests that the process for identification of land for new homes can be successfully initiated by a local community body. This process should be delivered by building collaboration between communities, landowners, local authorities, statutory agencies, funders and local housing providers.

NPF4 may wish to give consideration to how sustainable rural settlement patterns can be created and to whether whole new settlements are needed, perhaps on the edge of cities. These could be created with a new development model based on the new town approach, and aimed at addressing Scotland's need for affordable homes.

Local communities can offer knowledge and insight into what improvements and new development is needed in their places, and where these could be sited. They may also identify smaller or less obvious sites for new homes that would be otherwise overlooked. Local place plans will be an effective mechanism for embedding these opportunities into the planning system, alongside the traditional allocation of land through local development plan processes.

3. WHAT DOES PLANNING NEED TO DO TO ENABLE DEVELOPMENT AND INVESTMENT IN OUR ECONOMY TO BENEFIT EVERYONE?

- **Vision statement: A Scottish planning system that delivers inclusive economic growth nationally and locally, as informed by the views of local communities and other stakeholders.**

NPF4 should grasp the opportunity to act as the key document which will promote working in a whole-systems approach that includes the land use strategy, land reform, and community empowerment legislation as it relates to the physical aspect of place delivered through planning.

PAS believes that the purpose of planning in the long-term public interest (as set out in the 2019 Act) will be a key enabler of development and investment in opportunity. In a time of enormous upheaval, in terms of both climate change and economic shock, adjustment and recovery will need to take a long-term view, where place-based short-term fixes achieve positive impacts (but can also be reversed if they are not achieving their intended impacts).

The purpose of planning needs to be calibrated to NPF4, local development plans, and permeate regional spatial strategies. It can be secured in strategic environmental assessments where these are mandatory. To maintain trust, the purpose of planning also needs to permeate aspects of planning where it is not mandatory under the 2019 Act – pre-application consultation, development management, environmental impact assessments, enforcement and appeals.

Other aspects of the economy – transport and land-use integration, employment land, land reform, asset transfer, housing delivery - are bedrocks of successful, sustainable low carbon, natural, resilient and connected places (as quoted from NPF3's four main section headings). Over the years, planning has only matched expected performance with partial success.

Economic development and environmental management need to be made to work together more effectively and that is a place-based discipline. Green infrastructure (taking in environmental protection), natural capital, vacant and derelict land recovery and community ownership are topics that need to be brought together more cohesively in NPF4, the measure of which will be shown in National Performance Framework indicators and outcomes out to 2050.

City, town and village centres also need to evolve and adapt in ways which encourage people of different age groups to want to use them, looking beyond retail only. This might include creating better public spaces for social interaction and activity or be as simple as widening pavements or offering appropriate parking provision. Arts events and heritage schemes can promote local economic activity, as can relocating educational facilities in town centres.

PAS believes that chief planning officers can ensure economic success is built into place-based decisions if the right signals are provided by NPF4. The Place Principle and Place Standard are important for an economic vision which recognises health and wellbeing. PAS believe Scotland's towns can stimulate and distribute growth to drive economic recovery as localism gains traction, and that there should be an outcome-based conversation with business about more efficient travel patterns and a decentralised live/work pattern.

Against that background, PAS is well placed to facilitate, engage in and support local conversations with regard to inclusive economic growth. Developing local economic strategies can be informed or based on stakeholder engagement. This is the approach being taken in a project led by PAS, as commissioned by Dumfries and Galloway Council, to develop an economic strategy for Dumfries town centre. It is also probable that some local place plans will deal with how to facilitate inclusive economic growth.

4. HOW CAN PLANNING IMPROVE, PROTECT AND STRENGTHEN THE SPECIAL CHARACTER OF OUR PLACES?

- **Vision statement: A Scottish planning system in which the ideas and aspirations of local communities are interpreted and implemented through local place plans.**

The local character and history of places can be key stimuli for the engagement of individuals and communities with planning and placemaking. This is demonstrated by the large number of community councils and civic groups in Scotland, and the number of community-led plans that have been generated and led by local communities in recent years.

The social infrastructure of places is also important, and it is essential that Scotland's new and existing places are developed to create intergenerational communities and enhance sociability. Often, local projects to create this sort of social infrastructure will be led by communities, potentially around the re-use of existing but unused buildings.

Local place plans present a statutory opportunity for communities to capture their ideas and aspirations for their places. These are likely to be equally as relevant in coastal and island communities as in towns, cities and rural areas. PAS believes that collective action at local level can help meet national and global challenges, as well as impact positively on individual and community wellbeing through having a voice in the future of their place. Local place plans should be written into NPF4 narrative and policy as a key vehicle for meeting its aims.

Vacant and derelict land presents a key opportunity to identify sites where new and innovative approaches to delivery of new homes can be trialled. The new register compiled by the Scottish Land Commission can assist community groups themselves to become developers, especially targeting co-housing groups. Vacant and derelict land is often located in town and city centre locations, tends to consist of sites of a smaller size, and can be ideally suited for re-development by smaller developers, including community groups.

PAS would also support – in the context of the climate emergency - policies which promote the re-use of brownfield sites for new homes over the use of other sites, especially if they are in town, city or village centre locations.

Empty homes are a significant issue in Scotland and can have detrimental impacts on places in social and economic terms. PAS would like to see a structured policy approach from the Scottish Government, in partnership with relevant agencies, to bring appropriate empty homes back into use.

Greenbelt designation and policy can be a key issue for local communities and a review – outwith the NPF4 consultation - of how it is designated and what development may be acceptable is needed.

5. WHAT INFRASTRUCTURE DO WE NEED TO PLAN AND BUILD TO REALISE OUR LONG-TERM ASPIRATIONS?

- **Vision statement: A Scottish planning system that has resolved how to provide infrastructure effectively alongside new development, thus creating better places and promoting equity.**

Successful placemaking based around the Place Principle should be based on a collaborative approach to incorporating the necessary physical and social infrastructure to new places from the outset. This requires the issue of land value capture in the Scottish planning system to be resolved, alongside consideration of how local authorities can acquire sites which can be developed to deliver

inclusive economic growth. This was the approach to planning that created the new towns and it has also been demonstrated more recently that a version of this approach can be led by collaboration between local authority and private developers.

Infrastructure, as applied to planning systems, is often considered in terms of larger transport and energy projects. However, the importance of social and digital infrastructure should also be addressed in terms of creating a society where people have the choice to be connected physically and virtually.

Broadband remains a key issue in many rural areas. Digital connectivity is becoming increasingly important for social and economic activity, especially small business start-ups in rural areas. It is also likely that fast evolving digital platforms will become a standard aspect of community engagement. This will need to be balanced with traditional engagement methods, given that digital exclusion remains an issue in Scotland.

Local place plans may be a forum for discussing and identifying issues relating to physical and social infrastructure. Where several local place plans in a local authority area identify related infrastructure (or other matters) it may be beneficial for a co-ordinated approach to be taken to developing and addressing these ideas.

COMMENTS ON HOUSING TECHNICAL DISCUSSION PAPER

PAS supports the recommendations of the Ryden report to Scottish Government (January 2019) that the process for preparing housing land audits, and their form and content, should be standardised across Scotland, and clear guidance provided. Often communities who feel they are impacted by the development of new homes on sites allocated in the local development plan will want to understand how numbers for new homes have been assessed. An easy-read guide to both the Housing Land Audit and Housing Needs and Demand Assessment processes – if the approach as set out in the discussion paper is progressed – would be beneficial.

ADDITIONAL POINT

NPF4 is likely to be the first and key document by which people will engage with national strategic planning issues. A diagram showing how NPF4 relates to other documents – planning and otherwise – would be very helpful to members of the public and community groups. The diagram provided on slide 6 of the presentation included as an engagement resource on NPF4 should also be re-configured. Currently, it does not reflect that local place plans will need to have regard to NPF4 as well as local development plans, nor that they can set the framework for matters such as climate change and community resilience to be addressed through them at local level. It could be interpreted to suggest that regional spatial strategies will sit at the centre of Scotland's planning policy framework.

CONTACTS

PAS would be pleased to respond to any queries with regard to this response.



Petra Biberbach

Chief Executive - PAS

Tel: 0131 220 9730 | Mob: 



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