

30th April 2020

5th Floor,
Lomond House,
9 George Square,
Glasgow,
G2 1DY

Area 2-F (South)
Planning and Architecture Division
The Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Attention of: NPF4/Transforming Planning team

Dear Sir/Madam,

Scottish Government NPF4 (2050) Call for Ideas – Stantec UK response

I am writing in response to the NPF4 Call for Ideas process. Firstly, thank you for the opportunity to engage in what we hope will be a valuable consultation process, we hope our ideas for what Scotland might be like in 2050 and the changes we need to get there will prove useful. We agree that a high quality planning system is essential to create quality places with the homes, infrastructure and investment that people need. This consultation comes at a time of a declared climate emergency when the need for smart planning has never been clearer.

Stantec UK

Stantec UK comprises the former Peter Brett Associates (PBA), ESI and MWH businesses, which have come together to form an integrated consultancy providing trusted advice and multi-disciplinary engineering and environmental services. As an integrated practice of over 1,700 planners, environmental scientists, economists, engineers and project managers, Stantec brings longstanding experience of evidence-based plan-making and visioning work across the UK. Our integrated Scottish Planning, Transport and Economics teams specialises in strategic planning economic development, and economics for infrastructure generating and applying insight on how the interrelationships of planning, markets and infrastructure shape places.

The format of this response

As a leading planning and development consultancy with a deep and applied understanding of public and private sector perspectives across Scotland, Stantec is keen to play an active role in shaping NPF4. This response is independent of our clients, many of whom will also be submitting their own responses. Our response addresses the five key questions of the NPF Call for Ideas.

To add practical insight *working examples* are provided with these italicised and in bold.

Broadly this response considers the following key points within the draft NPF4:

- **Improving the evidence base for NPF4 which will now include SPP.** This means improving the evidence base for subsequent plans in the hierarchy, particularly LDPs; and.
- Ensuring the NPF4 is as focused as possible on **commitment to developments and their delivery.**

Stantec operates across disciplines at national, regional, and local levels. As such, we have experience in applying the full range of national level of planning policy. As a general rule we consider that the greater the emphasis on evidence base, the better the quality of the NPF as a strategic tool. Iterations of NPF since 2004 have gradually improved in this respect and NPF4 offers an opportunity to continue this progress.

NPF4 Call for Ideas Response

1. What development will we need to address climate change?

Stantec advocate a positive approach to the right kind of development in addressing climate change. Every sector of the economy must be responsible for driving down carbon emissions. A transition to an economy that is more productive, achieving more with less carbon intensity, is essential to achieving this.

There are clear opportunities for Scotland in meeting our responsibilities to address climate change. One such example is the **Falkirk Grangemouth Investment Zone**. Building on NPF3 National Development status for Grangemouth Investment Zone including carbon capture and storage, aligned with an existing pipeline of private sector investment, Falkirk Council, Scottish Enterprise, and its partners have developed a vision for the area to 2040. The Falkirk Grangemouth Investment Zone aims to position the area as a world leader in sustainable and innovative manufacturing (including low impact processes and heat and energy distribution), support for carbon capture. To tackle carbon emissions while transforming industries, such cross sector joined-up arrangements will be essential.

NPF4 should identify clusters and activity with the greatest potential to address climate change. This may relate to a business sector or infrastructure capacity. As NPF will provide a national perspective it needs to show how different clusters of business sectors, population, skills and infrastructure interlink and connect Scotland to provide solutions, thereby ensuring decisions made locally take cognisance of the national perspective.

As an example, Grangemouth Investment Zone is connected to the St Fergus Carbon Capture and Storage project through existing pipeline infrastructure and with shared skills, training and expertise. City Region and Growth Deals are also interlinked in similar ways and where they include delivery of physical infrastructure to facilitate growth this needs to be mapped for Scotland to build a framework for supporting strategy and policy making at local and regional level.

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

In the context of planning reform, NPF4 is an opportunity to move beyond standard debates around housing numbers towards deeper considerations such as how demographic change and economic shifts can be planned for, and what planning can offer places of anticipated decline as well as growth.

Our experience of developing business cases for infrastructure and housing in Scotland and the UK reinforces the importance of supporting strategic planning policy with appropriate funding and delivery mechanisms. The UK Government **Housing Infrastructure Fund** is a possible approach. Stantec worked with Medway Council to secure £170million for major infrastructure development on the Hoo Peninsula, including road and rail connections. With environmental infrastructure, these elements are required to enable development of 10,600 new homes in the area. Scotland could certainly benefit from funding of a similar scale, one which reviews and ultimately expands the existing Scottish Government Housing Infrastructure Fund.

Stantec advocate **an evidence-led principle in planning. This applies to NPF4 which will now include SPP. In policy there must be an evidence-based principle at the heart of the planning system.** Ensuring high quality & sustainable housing in the right places at the right time and sustainable healthy communities are created is reliant on a sound-evidence base. This needs to move beyond our current approach to assessing housing need and allocating land for housing. There have long been calls to move 'beyond the numbers game' with housing, but this is a symptom of a planning system which is unable to consistently deliver new and regenerated communities as expected. A stronger link between housing, wellbeing and health (as signalled) will encourage a evidence-based approach, and one more clearly informed by delivery and measured by more holistic planning outcomes. Ultimately, the way to move beyond debates around housing numbers and towards the creation of healthy sustainable places which provide enough housing for all, is to have planning system that delivers on the ground and this needs to start with a better aligning of planning with infrastructure provision.

Once informed by a sound evidence base, NPF4 must be aligned with a better approach to housing delivery with greater partnership between the public and private sector to development. Otherwise we will continue to fail to deliver enough well-designed homes in the places they are needed most. One possible way of achieving delivery and quality is a scaled-up reworked version of Scotland's current Housing Infrastructure Fund. This might be aligned with the ongoing work of **Scotland's Land Commission** (which Stantec has contributed to through research on measuring the impacts of **Vacant and Derelict Land on communities**). Decisions will still need to be made on the appropriate balance of rural and urban, new settlement and regeneration, but we must first focus on evidence-led planning and assess how we could deliver this using new mechanisms and interventions.

There should be a more structured evidence-base in plan-making to ensure better health and wellbeing through planning. Stantec have been developing the evidence base for local authorities across the UK, via Health Impact Assessment and particularly in Wales through the implementation of the Well-being of Future Generations Act 2015 which must be applied

through local plans. There are lessons that could be learned to give health and well-being a stronger footing in the plan-making process and this could start with the NPF at the top of the planning hierarchy filtering down to other plans and policies.

Despite successive reforms, planning and delivery of development remain disconnected. This is clear in the difficulties encountered in planning new settlements and major regeneration projects. Through NPF4, an improved evidence base and delivery mechanisms are key to improving as many lives as possible, enabled by the planning system. Community buy-in will be greater where there is confidence essential infrastructure will be provided and the benefits of development to quality of life, health and wellbeing are clear. While planning can shape markets, we are more likely to require new settlements where population growth is greatest and regeneration projects are more likely to be viable where the greatest growth in forecast. In these places the planning system should continue to support a brownfield-first approach where the opportunities exist. We continue to work with public and private sector partners in areas where such an approach is promoted including creation of a new settlement on former open cast mining works at **Blindwells**, as well as the transformation of the former **Cockenzie power station**.

But looking to 2050 we must also balance this with a focus on regeneration of areas with great potential but not necessarily the strongest population growth. Our work with private sector partners and West Dunbartonshire Council **at Clyde Riverfront** demonstrates how creating the conditions and targeting City Deal funding may kick start development and encourage advanced industry and communities back to the River Clyde. This provides a lesson as we look to 2050 that with willing partners, and the right type and scale of public sector intervention, the planning system can help reshape markets and deliver.

3. What does planning need to do to enable development & investment in our economy to benefit everyone?

At the confluence of planning, economics, and infrastructure design and delivery, our planning, transport and economics teams have been working with various public and private sector organisations on Scotland's City Region and Growth Deals and promoting industrial innovation through, for example, work on Scotland's Advanced Manufacturing Innovation District.

Towards 2050 and adoption of Industry 4.0, there will be increasing automation, connectivity and data-driven jobs, a shift towards people having several careers rather than 'jobs for life', and a potentially reduced focus on work as a 'place'. The related land use implications will be significant, creating challenges and opportunities. In the short to medium term, we need to ensure that while we support the development of our larger city regions through well-designed and targeted programmes, investment is also focused on the places and people potentially in danger of being left behind. Workable inclusive growth strategies should be the heart of public and related private sector investment.

In preparing for structural economic change, the planning system needs to focus on **improving the evidence base to support economic development in NPF4 and subsequent development plans** and ensuring related planning & economic development strategies are

achievable. This could be a key part in coordinating SPP and NPF. There needs to be a stronger focus on what is possible where, and what is required to ensure aspirations in plans are delivered on the ground. The Scottish and UK Governments are focused on the need for increased infrastructure investment and the return of 'industrial development strategy' signals a positive shift. To ensure society reaps the potential rewards of this, development plans in Scotland need a far stronger focus on the evidence-led approach to economic development.

4. How can planning improve, protect and strengthen the special character of our places?

The risks associated with climate change will require stronger approaches to improving, protecting and strengthening the character of our places. This means greater intervention and a stronger role for planning. This will require improved assessment capacity in assessing the impacts of proposals including interventions. This points again to **improved and evidence-led planning** as we go forward.

In terms of protecting the special character of places, we have focused here on the specific role of town centres. We support NPF4, incorporating SPP's continued strong commitment to city and town centres as the focus for development in Scotland. However, without significant intervention it is likely that their role will be increasingly threatened. The present experience of COVID 19 restrictions is accelerating change. Current planning policy support for city and town centres will have to be backed up with significant investment to help town centre transition. Again, a strong evidence base should underpin strategies to inform the transition. We are working with local authorities across England through the **Future High Streets Fund** and the **Towns Fund** where the MHCLG is supporting and funding local areas' plans to make their high streets and town centres fit for the future. There are lessons that could be learned from FHSF for Scotland's city and towns centres and it may be that NPF4 incorporating SPP needs to signal a new type of approach that justifies greater intervention.

In relation to Vacant and Derelict Land, Stantec recently completed work for the **Scottish Land Commission (PBA/Stantec 2019¹)**. Scotland has far too much unused, unproductive vacant and derelict land and addressing this will need to be a priority for the NPF. While the work of the Land Commission is ongoing, the NPF should take account of what has emerged and continue to tackle VDL as a priority.

5. What infrastructure do we need to plan and build to realise our long-term aspirations?

Alongside the work of Scotland's National Infrastructure Commission and on-the-ground strategic developments including those related to Scotland's City Deals, the NPF4 is in a better place than any previous iterations to see infrastructure-first approach to development. Looking

¹ PBA-Stantec (2019) *Vacant and Derelict Land in Scotland Assessing the Impact of Vacant and Derelict Land on Communities*, Scottish Land Commission.
https://landcommission.gov.scot/downloads/5dd7d4dfa39b6_VDL%20in%20Scotland%20Final%20Report%2020191008.pdf

to 2050, Scotland's economy will need to have successfully transitioned from carbon reliance. NPF4 must become one document among others which helps to radically change our economy and society and the link between planning and infrastructure delivery, which has eroded in the last 40 years will need to be rebuilt over the course of NPF4.

Conclusion

In conclusion, NPF4 (incorporating SPP) is a tremendous opportunity for the planning system to again lead the response to some of the biggest challenges Scotland faces. Stantec's submission has focused on two aspects to help ensure we grasp the opportunity: improving the evidence base for planning through NPF4 improving its use as a direction-setting tool; and ensuring NPF4 does as much as possible to support eventual deliver through other parts of the planning system. We thank you for the opportunity to engage through the Call for Ideas process and look forward to any future opportunities for engagement.

Yours faithfully,



Nick Skelton

Director of Planning and Economics