

National Planning Framework for Scotland (NPF4) – Call for Ideas

Who are we?

The Landscape Institute (LI) is the royal chartered body for the landscape profession. We represent over 5000 landscape architects, planners, designers, managers and scientists. As a professional organisation and educational charity, we protect and enhance the built and natural environment for the public benefit, and we provide training, accreditation, technical advice, and standards to maintain the high quality of the landscape profession in the UK.

Contribution to the *Call for Ideas*

The Landscape Institute and its devolved nation Branch, the Landscape Institute Scotland, welcome the opportunity to contribute to the call for ideas on the new National Planning Framework and to outline what we consider to be the future priorities for the planning process.

We have provided responses to the 5 key questions set out by the Scottish Government. These are set out in two documents, the first from our public sector members focussing on the existing SPP and what needs to change ([Read here](#)) and the second, from our private sector members, provides more detailed ideas for each topic area ([Read here](#)). These have been summarised in this high level statement of **18 key recommendations (pages 3-5)** which also takes on board the findings of Scotland’s Landscape Alliance, a grouping of over 60 organisations with a common interest in raising awareness of the importance of Scotland’s landscapes to climate resilience and biodiversity, our economic performance and public health and wellbeing.

Some of our comments go beyond planning policy to highlight the urgent need for a **‘whole system approach’** to align policies, programmes, financing and control measures.

Introduction to high level comments

The Scottish Government’s National Performance Framework is aligned to The United Nations’ 17 Strategic Sustainable Development Goals.



credit: Azote Images for Stockholm Resilience Centre, Stockholm University

The *Wedding Cake* diagram demonstrates that the biosphere supports society and then the economy. Landscape and Natural Capital, highlighted, are fundamental to the founding base and key components to the delivery of a number of the UN goals and in consequence our National Performance Framework.

What is landscape?

Landscape is about the relationship between people and place. It provides the setting for our day-to-day lives and is an important part of the quality of life for people everywhere: our urban areas, countryside, coasts and waterways, in areas recognised as being of outstanding beauty, as well as everyday spaces. Landscapes are an essential component of people's surroundings, an expression of diversity of their shared cultural and natural heritage and a foundation for their identity, now and in the future. Scotland's Landscape Alliance (SLA) April 2020

Benefits of Landscape

Scotland's landscapes provide the physical foundation for our lives and the places where we live, work, learn and play. More importantly as we emerge from the effects of an international pandemic, access to high quality landscapes influences our health, wellbeing and livelihoods. Landscape plays a vital role in tackling the global issues of climate change and biodiversity loss that are already having a major impact on all our lives. Scotland's landscape is essential to our nation's economic success both directly, in terms of the natural capital which underpins many industries, and indirectly through its impact on quality of life which attracts people to live, work in and visit Scotland.

Recent qualitative research carried out in Scotland by the Landscape Institute Scotland has indicated that there is a perception that current state of the country's green infrastructure is declining and that there is a need for urgent investment in managing and maintaining landscapes and greenspaces across urban and rural areas. As our strategy document ***Landscape for Scotland*** ([read here](#)) highlights, this change has not happened quickly, but is the cumulative result of decades of decision-making. As the pressure on our land increases, even in the next 5 years, this could decline further if action is not taken to invest and protect these natural assets. Landscapes are capable of absorbing and adapting to change, but every place has its own carrying capacity and infrastructure development must be sensitive to that. There is a need for bespoke solutions that are genuinely place-based and approached at landscape-scale.

As a priority, we need to invest in the management and enhancement of landscapes and greenspaces to ensure that our natural capital stocks are not depleted and to recognise the important role that they play in delivering a number of strategic, national objectives and outcomes. Additionally, investment in landscape services, including the expertise of landscape professionals, in other areas of infrastructure development is also critical to ensure that infrastructure is designed and delivered in a way which is effective and does not damage natural assets.

We support a more strategic approach to prioritisation and investment and stress the importance of not overlooking the role of landscape as infrastructure when gathering and analysing the evidence. If we do not ensure that these aspects are prioritised and integrated into plans now, we will be creating problems that will need to be addressed in the future, and likely requiring significant public expenditure.

We need to be alive to the changes that we face in the 21st century. Landscape scale design responses are required to tackle the global issues of climate change and biodiversity loss and address the challenges that Scotland faces to achieve the Scottish Government's targets. For example, there is a risk that responses to the climate emergency are not considered holistically and result in potential impacts at a national scale. Carbon capture may result in monoculture of forestry without the benefits of biodiversity.

Likewise, implementation of large-scale renewable energy development and storage needs could have impacts on landscape and environmental quality. A long term view on stewardship of landscape at all scales is needed to ensure liveable and healthy places are created which protect our natural landscapes and support sustainable rural communities.

For this to happen will require a major shift in the mindset of all organisations and people involved in matters that affect our landscape. This needs to permeate daily actions and support joined up decision making. Through the combined action of Scottish Government, stakeholders, landowners and communities we can ensure that Scotland's landscape is safeguarded and can play a full part in our recovery from current and any future biosecurity challenges through actions to deliver health and wellbeing, inclusive economic growth and climate resilience

High Level Comments

The current NPF3 and SPP have now been superseded by events but it is clear they have not successfully achieved all desired outcomes since 2014 on landscape related matters despite being a material consideration in the planning system. To incorporate SPP and all other policy and guidance (e.g. Creating Places and Designing Streets) into the NPF4 will give it a statutory function and therefore provide more weight. However, these policies cannot now be viewed in isolation as they interconnect with climate change, health and wellbeing, place, energy, housing and biodiversity.

NPF4 is an opportunity to radically alter the current format and siloed nature of planning policy by prioritising the role of landscape and new landscape-related policy to deliver landscape that supports a new well-being economy. This would demonstrate commitment to the UN Sustainable Development Goals, help deliver Scotland's National Outcomes and embed the principles of the European Landscape Convention.

Key Recommendations

National Standards and Policy

1. **A National Landscape Advisor** should be appointed to the Scottish Government to help shape the development of Scotland's *Landscape, Land Use and Infrastructure Plan* and to work across current SG Directorates to achieve consistent and joined up thinking and inform Local Planning Authority decision-making. This will demonstrate the Scottish Governments commitment to **the Place Principle** by working holistically between its own Directorates and with other stakeholders and by doing this will also permeate down to Local Planning Authority decision making.
2. NPF4 outcomes should be extended to include a **multifunctional approach** to deliver **positive effects** for climate change, environmental net gain, health and wellbeing, net zero carbon, housing and active travel targets and to help resolve land use conflicts.

NPF4 should include **a statutory national plan and related policy for *Landscape, Land Use and Infrastructure*** to consider and design appropriately for the large scale change that will be required in Scotland to deliver on SG priorities. This Plan should:

- a. Inform National Developments, Regional strategies and Local Development Plans consistently;

- b. Inform the recommendation contained in “A blueprint for Scotland” (Key Findings Report, Infrastructure Commission for Scotland. Jan 2020) including that **all landscape is viewed as infrastructure**; and be
 - c. be based on Landscape Character Assessments.
3. Scotland should develop and report on **national indicators for landscape** within the National Planning Framework and develop and define **quality standards of landscape infrastructure** to deliver national outcomes of positive health and wellbeing, environmental outcomes to address climate change action and biodiversity, and inclusive growth and reduced inequalities.
4. **Landscape protection** - There is an urgent need to develop a new statute based on international best practice to ensure the continued protection and stewardship of our national landscape assets.
5. **Landscape data** - Landscape thinking should inform the revision and digital transformation of Scotland’s planning system, including the collection and inclusion of landscape data.
6. **Degraded landscape** - We need to define and map degraded landscape (urban, rural and coastal) and agree with landowners and communities the actions needed to revitalise them.

Statutory Duties

7. The proper **design, management and effective use of all landscape** (urban and rural) with respect to health and wellbeing, climate change and nature should become a **statutory function for the public sector** and a key requirement of all landowners. This should include the role of landscape, especially urban greenspace, in future pandemic and bio-security planning.
8. Ensure appropriate advice, guidance, expertise and challenge to ensure climate change, nature and community resilience outcomes are incorporated into relevant place/landscape policy. Currently there is an expertise and skills shortage in landscape matters within most Local Planning Authorities and to address this each should appoint a *senior grade landscape professional* as a **statutory post**.

Supporting Delivery

9. **Landscape Character Assessment, GVL (in full)** and the **Place Standard** are tools which should be used in planning and related decision-making as a means to help achieve **well designed** place-based solutions and minimise land use conflicts.
10. Programmes, like the Scottish Awards for Quality in Planning, that recognise, accredit and reward **good practice** in respect of planning, design, delivery, management and use of quality landscape should be encouraged and supported.
11. **Building standards** will require revision to meet the aspirations of NPF4 and to help address the Climate emergency and support the Circular Economy. This should as a minimum mandate that all new developments are fully energy efficient and existing buildings are retrofitted to be as energy efficient as possible and in this that Sustainable Urban Drainage Systems, including green roofs and green walls, are encouraged as part of the solution.

12. **Business rates** should be aligned to underpin planning policy for example as a means to support the revitalisation of the High Street, deliver more city centre housing, reuse of gaps sites and discourage 'edge' development.

Funding Mechanisms

13. **Natural Capital Accounting** methods should be developed and promoted to inform asset management and investment decisions around infrastructure and development.
14. Consideration should be given to develop a new **Landscape Green Deal** funding mechanism to support action by public/private/community landscape partnerships (for example to reinvigorate degraded land, deliver landscape scale action, promote cultural landscapes and address tourism landscape hotspots).
15. **Rural Development** - Funding mechanisms as part of in a new Scottish Rural Development Programme should support sustainable local land use and planning policy and be structured to deliver quality landscape outcomes, and increase partnership working and community-led innovation in relation to rural and agricultural landscape.
16. **Revenue Budgets** - There is an urgent need to properly resource the management of public landscape assets to address environmental challenges, deliver health and wellbeing services and resources to the community and individuals, and contribute to equitable inclusive growth. This may require innovative as well as traditional funding models.

People

17. **Communities** - Decisions affecting local landscapes must be taken collaboratively with local communities given the time and support to have a voice and engage in the planning system and co-design.
18. **Invest in staff** - Investment in staff training is needed to support better decision-making about landscape outcomes, and equitable pay and conditions are essential to support the committed land-based workers, rangers and community facilitators who manage and connect communities with landscape.

Our members – landscape professionals engaged in the science, planning, design and management of landscape – are well placed to support the public, private and third sectors transition to a just and environmentally sound economy focused on delivering wellbeing. We highlight our expertise in respect of green infrastructure design to address urban heating, flooding, sea level rise etc., in delivering Environmental Net Gain and in designing for active travel. The LIS would be happy to engage in further dialogue with the NPF4 team to explain or amplify our submission.