

The National Planning Framework 4 call for ideas

Submission from [REDACTED]

Planning provides the framework for the physical development of Scotland, helping shape how our settlements and landscapes evolve. The delivery objectives of the planning system are informed by our national ambitions.

From the perspective of our cultural and natural heritage – its conservation, creation, transmission and enjoyment – there have been a number of important developments since the last revision of the National Planning Framework and the Scottish Planning Policy in 2014:

- The Planning (Scotland) Act 2019, which for the first time sets out the purpose of planning as the long-term, sustainable development of Scotland;
- The new Planning Act also gives explicit recognition to the role of culture in place-making, and includes planning provisions for cultural venues;
- The revised National Performance Framework for Scotland, which for the first time includes culture as one of the ten national outcomes sought: that people are creative and their vibrant and diverse cultures are expressed and enjoyed widely;
- A Culture Strategy for Scotland, the new national strategy for culture, and which recognises the role of culture in place-making;
- Our national approach to conservation designations has been evolving, with an expectation that communities have a greater input to decision-making, and a greater desire for management objectives to be made explicit;
- The recognition of a climate emergency and a biodiversity crisis signals greater national ambition to address these issues, and we propose that the new NPF take a national spatial approach to safeguarding our natural heritage, and the climate resilience it provides; and
- Finally, the Scottish Government has committed to meeting the United Nations Sustainable Development Goals, which include a number of planning related targets, including the incorporation of ecosystem services into national and local planning.

[REDACTED] has also carried out research on public perceptions of the planning system, and how it is meeting the needs of citizens. Our 2017 research found that the majority of Scots – 60% - felt that have had no influence on planning decisions affecting their local area. Twenty-seven percent felt they had a little influence, and only 9% a reasonable amount of influence.

In terms of local environment, the same research found that only 41% of respondents thought that their local historic character was being protected or enhanced by the planning system, and similarly, only 47% of respondents thought that their local greenspaces and natural heritage had been protected or improved by the planning system. The new NPF is an opportunity to improve on this performance.

We have also recently conducted research on local place planning, and when we asked what amenities people had access to – such as greenspace, gardens, or cultural venues - we found very different experiences, with younger people, ethnic minorities, and those on lower incomes all having poorer access. Local Place Plans are a welcome innovation in the planning system, and can potentially help improve these outcomes, but will need support and engagement to reach all citizens. The National Planning Framework is an opportunity to realise these ambitions.

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

Land Use Strategy and regional-scale planning

For Scotland, the fundamental strategy for addressing climate change, both mitigation and adaptation, is the Land Use Strategy, created under the Climate Change (Scotland) Act 2009. The LUS approach uses the available evidence to identify how our settlements, infrastructure and land uses can meet our society's social, economic and environmental needs, and involve communities in shaping plans for each area.

Following on from the initial pilots, there are now plans to create Land Use partnerships across Scotland, and these should be integrated with local and regional planning, and the National Planning Framework can create the framework for this integration.

We recommend that the revised NPF incorporate the ten sustainable land use principles from the Land Use Strategy.

UN Sustainable Development Goals – Target 15.9

Incorporating the Land Use Strategy into the National Planning Framework could also help Scotland meet its 2020 target to incorporate ecosystem services into planning policy and planning decisions – this is target 15.9 of the United Nations Sustainable Development Goals, which the Scottish Government has committed to meeting (Target 15.9 Ecosystems and biodiversity: By 2020, integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts). Improving the care and management of our ecosystems will help improve our environmental resilience, and in turn our social and economic resilience as a society.

Adaptation of buildings

For buildings, adaptation will be key, as with less than 25 years to go to 2045. The bulk of Scotland's housing supply, some 2.6 million dwellings, already exists and will change only slowly. Current housebuilding rates are around 17,000 completions a year, representing a 0.65% addition to total stock. Even at the very highest levels of housebuilding in the last century at 40,000 dwellings a year, reached in the early 1970s, this is still only a 1.5% change year on year. The key to a liveable Scotland will therefore continue to be keeping buildings in good repair, adapting these as needed, and ensuring that employment, public services and transport support existing settlements. Reusing existing buildings also helps reduce carbon emissions – unavoidable when building new structures.

The planning system has an important role in encouraging the adaptation and re-use of buildings.

Landscape impacts

Given the climate change ambitions for 2045, and therefore a move to increased renewable energy generation (and associated transmission), the NPF should take a proactive approach to siting and mitigation of these developments, which typically have a wider spatial impact on Scotland's landscapes than conventional generation.

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

National Performance Framework

Scotland has adopted a National Performance Framework, which sets the outcomes we seek as a country, and the measures through which we can track progress. In terms of quality of life, health and wellbeing, particularly important outcomes are:

- Culture - we are creative and our vibrant and diverse cultures are expressed and enjoyed widely;
- Environment - we value, enjoy, protect and enhance our environment; and
- Communities live in communities that are inclusive, empowered, resilient and safe

Planning alone cannot by itself dictate outcomes - for the most part these will also require the application of resources by the public, private or third sectors.

What planning can do, is protect existing assets from damaging development – particularly important assets are given legal designations for this reason – and to manage change in a positive way.

For the revised National Planning Framework, we would recommend the spatial elements of the National Performance Framework are integrated into the revised NPF, and the relevant elements of the current Scottish Planning Policy are carried over. Among these, we would recommend retaining the current policy principles for the historic environment:

“Promote the care and protection of the designated and non-designated historic environment (including individual assets, related settings and the wider cultural landscape) and its contribution to sense of place, cultural identity, social well-being, economic growth, civic participation and lifelong learning;” and
 “Enable positive change in the historic environment which is informed by a clear understanding of the importance of the heritage assets affected and ensure their future use. Change should be sensitively managed to avoid or minimise adverse impacts on the fabric and setting of the asset, and ensure that its special characteristics are protected, conserved or enhanced.”

To which we would add the new provisions on cultural provision, including the agent of change principle, and the desirability of maintaining an appropriate number and range of cultural venues and facilities in a district.

The current commitment to landscape management for Historic Battlefields and for Gardens and Designed Landscapes should also be retained, but we would recommend identifying conservation objectives for these, in line with spatial – and community engagement - approach taken in more recent designations, such as Marine Protected Areas.

Finally, Scotland’s landscapes, whether designated (internationally, nationally or locally) or undesignated are matrix in which so much else fits – including natural heritage, biodiversity, climate resilience, public amenity, cultural heritage, and economic activity. We would ask that the new National Planning Framework takes a holistic approach to landscape management, drawing on the available planning tools, such as National Scenic Areas, National Parks, and Special Landscape Areas.

Local place plans

One important development in Scottish planning is the introduction of local place plans in the 2019 Planning Act, which are an opportunity for communities to shape how their local environments are developing. Research finds that the majority of Scots do not currently feel able to influence the planning system, and less than half feel that the planning system has been able to protect or enhance their local historic or natural environment.

Research is also pointing to minority groups being underserved in access to amenities, including greenspace, gardens, and cultural venues. In developing local place plans, the National Planning Framework can help address this situation by:

- Ensuring local place plans are given status within the relevant Local Development Plan, and in subsequent decision-making;
- That developers respond to the ambitions expressed in local place plans; and

- Resources are available to help communities develop their plans, helping engage all members of the community.

We would note that the Royal Town Planning Institute report in 2016, Linking People and Places, recommended that:

- Community plans should be the sovereign plan for the local authority area, with the LDP seeking to deliver it spatially.
- Key engagement stages during preparation of Community Plan and Local Development Plan should be shared so they are seen by the public as one consultation.
- These should extend the call for sites to a call for assets and ideas to share frontloading.

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

In terms of economic development, it is difficult to forecast what the economy will look like in 30 years, or the type and composition of activities. The planning system will therefore need to remain flexible, and anticipate the use and re-use of existing assets, and avoid prioritising any one form of development or land use.

What will remain current is our natural and cultural heritage, and we know from both domestic and overseas experience that quality of place is an important factor in attracting and retaining investment, and working age populations. Planning in Scotland is already seeing a renewed emphasis on place-making, and a more regional approach to economic development. We would strongly support this policy direction.

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

There are many ways in which the planning system can safeguard and enhance the character of our places, and we have touched on some of these above, including landscape management, the management of locally and nationally significant sites, and better involvement of citizens in how their local environments are changing.

We would also point to three areas for consideration in the revision of the National Planning Framework:

Our Place in Time strategy

Our cultural heritage is the basis for our identity, it shapes our built and rural environments, and provides enjoyment for citizens and visitors. The planning system has an important role to play in managing change, and this is recognised in the Our Place in Time strategy for the historic environment:

“Change is an inevitable part of the dynamic of the historic environment, and how this is managed is the critical factor. It is vital to strike the right balance between development and the protection of significant historic environment assets. The planning system is one of the main mechanisms in which this balance between protection and managing change must be considered – in specific cases and more strategically.”

and:

“The vast majority of Scotland’s historic buildings and archaeological sites are not designated, but, once recorded, are a material consideration in the planning process. Only a small percentage have the added protection of being recognised as nationally important and are, for example, listed, scheduled or included in a national inventory.”

Recording and designating remain important protections for our cultural heritage. There is growing recognition that these designations should identify why and how these sites are being managed, and what the conservation objectives are. The revised National Planning Framework is an opportunity to embed the conservation of cultural heritage in the wider processes of place-making.

A culture strategy for Scotland

In 2020, we welcomed a new culture strategy for Scotland. Culture can take many forms, but the strategy also recognises its role in place-making:

“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.”

This is anticipated in the 2019 Planning Act and its provisions for cultural venues.

Green Belts

Green Belts, while dating from 1947, are an example of how the planning system can reconcile different ambitions with a view to long-term sustainable development. In their original form they helped prevent urban sprawl, safeguarded prime – and scarce – agricultural land, and provided public amenity.

We would like to see the practice of planning for Green Belts revived, with new development prioritised on existing brownfield land, and better management of our existing Green Belts.

The practice of landscape planning for settlements that was undertaken last century is even more relevant now, when we are recognising the role of ecosystem services and natural solutions to the climate crisis. Consideration should be given to how this holistic approach can be revitalised and extended.

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

Traditionally, much of infrastructure planning has focused on built infrastructure, whether energy, transport, services etc. and our natural environment has been the ground on which this has been constructed.

There is now growing awareness that our natural environment cannot be taken for granted, and in fact even our social and economic activities depend on a healthy environment and the ecosystem services that our environment provides. One aspect of a healthy environment is connectivity, that species and habitats are sufficiently interconnected to allow them to spread and thrive.

We can draw inspiration from Denmark where, as a strategic framework, the Green Map of Denmark will contribute to ecosystem services such as reduced greenhouse gas emissions, cleaner aquatic environments, CO2 storage in the soil, better recreational opportunities and improved conditions for managing water after extreme rainfall.

The Green Map of Denmark shows where existing valuable nature is and where new potential areas that can create connectivity could be. In terms of planning, by 2017 municipalities were asked to designate areas of the Green Map of Denmark, based on a common base map and common criteria. The map will be included in municipal plans for the first time in 2017 and continually refined and implemented.

Our proposition is that we adopt a similar approach and use the National Planning Framework to take a national approach to the spatial management of nature, as was first suggested in the National Planning Framework 3 in the form of a National Ecological Network.

Scotland is a patchwork of large and small plots of land, under many different ownerships, and put to a variety of land uses. This lends our country much of its character and interest, as well as providing for our social and economic needs. Within this, our planning system is how we find resolutions for competing or conflicting needs.

What we are less good at – perhaps because it has no voice of its own – is planning for nature. Our current approach is piecemeal, predominately local, in the form of nature reserves or Sites of Special Scientific Interest or Special Landscape Areas, for example, and occasionally rising to regional-scale, in the form of National Scenic Areas, regional parks or National Parks – but not to a national scale. Our natural environment, its species and habitats needs connectivity to function well, which can only be achieved by taking a truly national perspective. This is recognised by the Scottish Government in its declaration of a climate emergency, and in the latest Programme for Government where the government identifies that “nature plays a key role in defining and regulating our climate and climate is key in shaping the state of nature.”

Planning solutions

The planning system has the power to prevent and to encourage, but not to dictate. We believe the planning system currently has unrealised potential to frame expectations for a healthier, attractive and more resilient country, resulting in benefits for all.

██████████ is one of the largest landowners in Scotland managing land for public access, enjoyment, biodiversity and landscape. Our estate encompasses large areas of upland, coasts, islands and lowlands. As such we are well placed to understand the challenges of managing for multiple public benefits. A common thread across our properties is the need to consider and work with neighbouring landowners, especially where designated site boundaries cross ownership boundaries. Many of the systemic pressures (e.g. invasive non-native species, grazing pressure) and solutions emanate from the wider landscape. Landscape-scale partnerships are a potential solution at a local level, but they are piecemeal and often exist within a policy vacuum. The best examples are where they operate within a broader planning framework such a National Park.

Within a Scotland-wide context, a National Ecological Network, embedded within the planning system would be a major step forward in enabling landowners to address some of the key drivers of biodiversity loss. Collaboration also brings other benefits such as social cohesion and economic efficiencies. Our vision for an NEN would also seek to integrate landscape and biodiversity objectives. Existing protected areas would form the backbone of a wider landscape network, where existing areas of natural habitat are enhanced, new areas of habitat are restored and created, and land managed for other purposes is managed in a way that supports nature. The NEN would take a strategic approach to where and how to target habitat conservation and creation and how to shape land use policy in a way that contributes most effectively to shared goals. We believe this could be by shaping future development, rather than dictating and – as the long-term health of our planet becomes more visible and important – is likely to command widespread public support.

Summary

In the short term, over the next 10 years, the National Planning Framework 4 can put the National Ecological Network on a sound footing, and greater connectivity for Scotland’s species and habitats is realised.

Longer term, Scotland's green network flourishes alongside other essential networks, such as transport, energy and communications.

Overall, Scotland plans for its green infrastructure in the same way as it currently plans for its "grey" infrastructure (transport, communications, energy) resulting in a healthier, more resilient, and better performing country.