

Written Evidence to the LGHPC regarding the Revised Draft National Planning Framework 4

Key Points

RTPI Scotland welcomes the progress made in the preparation of the NPF4 and supports its ambitions on climate change, net zero carbon and biodiversity and more clarity in policies. Given this, we support its approval in Parliament.

However, in taking forward the NPF4's implementation and delivery:

- we disagree with the conclusions of the BRIA regarding resourcing impact on planning authorities, especially on potential savings in Local Development Plan (LDP) preparation and around transition arrangements.
- we are disappointed with the lack of detail in the Delivery Programme and believe the LGHPC has an important role to play in scrutinising progress made on this.
- we are disappointed that no capital investment programme has been published alongside the Framework and would like to see this included as part of future iterations of the Delivery Programme.
- we maintain the view that there is a continued need to resource the planning system appropriately to deliver the NPF4 and, given this, we advocate for the inclusion of a comprehensive skills and resource strategy in an updated Delivery Programme.
- we wish to see more consideration in the Delivery Programme of how to achieve corporate buy-in to the NPF4 across government and key stakeholders.

1. Revised Draft NPF4

RTPI Scotland welcomes the progress made in the preparation of the NPF4, especially considering many planning authorities have been waiting to start the preparation of their new Local Development Plans (LDPs). As with the previous draft NPF4, we welcome the primacy given to the climate and nature emergency in the document. We are pleased to see that a number of RTPI Scotland's points raised in the consultation to the first draft NPF4 have been addressed, especially around points of clarity, consistency and connectivity.

Regarding the National Planning Policies, we understand that a significant number of changes have been made - 427 in total. A large number of these changes are relatively minor edits aimed at improving the usability and clarity of the document. Whilst not changing the fundamental nature of the Framework, we believe the cumulative effect of such edits with have a significant and positive impact upon the usability of document. There are a smaller number of more substantive changes to policies including:

- The 'Universal Policy' section and approach has been removed leaving three sections around sustainable, liveable and productive places
- The human rights and equality policy has been removed and replaced by a statement.
- The energy policy has been substantially revised, notably with the alteration of the natural places policy to be more permissive of renewable energy developments in wild land areas.

RTPI Scotland supports the more substantive changes to policies set out above. We note that six are substantively or entirely novel policy areas have been introduced when compared to Scottish Planning Policy (SPP) and NPF3 including:

- Local living and 20-minute neighbourhoods
- Infrastructure first
- Play, recreation and sport
- Health and Safety
- Community wealth building
- Culture and creativity

We broadly support the content of these policies, but it needs to be made clear that these will have a resourcing impact for planning authorities, something we do not think has been fully identified in the Business and Regulatory Impact Assessment as set out beneath. However, given the overall improvement of the Framework, RTPI Scotland would advocate that the committee and parliament approves the Framework enabling its subsequent adoption.

2. Business and Regulatory Impact Assessment (BRIA)

RTPI Scotland disagrees with the conclusions of the [Final BRIA](#) regarding resourcing impact on planning authorities. The conclusion mainly draws focus to potential savings for planning authorities in the LDP preparation with the adoption of National Planning Policies. It is stated that where additional policy requirements are more significant, additional guidance and skills development will be undertaken, but makes no mention of the necessary provision of additional resource.

In many cases, RTPI Scotland does not think the BRIA has fully considered the real-world costs of the revised NPF4 on planning authorities and has not been completed in a consistent manner. Although planning authorities will be affected by almost every policy change, a full evaluation of potential costing for them has not been consistently undertaken. This can be seen, for example, in policies where additional resource burdens on planning authorities to consider new evidence or assessments has been highlighted (e.g. Policy 30), whilst remaining silent on other new or expanded policies (e.g. Policy 23). Notwithstanding this, the BRIA has identified 14 areas of policy that may have a resourcing and skills impact on planning authorities, a number which we believe to be an underestimate. Given this, RTPI Scotland reiterates calls on Scottish Government, as made to the previous draft NPF4, for a comprehensive resource and skills strategy to be published as a part of the Delivery Programme.

3. Delivery Programme

Process

RTPI Scotland is disappointed with the lack of detail in the Delivery Programme. This is a first iteration and is intended to an evolving document, and we note comments from the Minister in his parliamentary address that he very much welcomes any comment and feedback on proposals from stakeholders. We believe the LGHPC has an important role to play in scrutinising progress made through the Delivery Programme, especially considering the on-going role the committee will have in monitoring the NPF4 through the annual reporting process.

RTPI Scotland notes that the [explanatory report](#) includes an 'issues raised and changes made section' regarding delivery. Procedurally, RTPI Scotland is disappointed with this

approach as a full draft delivery programme was not consulted upon. This reduced the opportunity for stakeholders to contribute and enhance its content, therefore, meaning that the opportunity for Scottish Government to identify issues and make changes at an early stage was diminished.

The success of the NPF4 will depend on the progression of a number of other workstreams at Planning, Architecture and Regeneration Division (PARAD) and a number of provisions in the Planning (Scotland) Act 2019, as recognised in the 'Actions' subsection. For example, Regional Spatial Strategies (RSSs) are listed as one of the key mechanisms to deliver the Framework. RTPI Scotland are concerned that the importance of RSSs is not fully recognised, and without guidance it is likely that they won't be produced until after the next generation of LDPs. This means we run the risk of RSSs running more as a commentary on Regional Economic Strategies, City Region and Regional Growth Deals, Regional Economic Partnerships, Regional Land Use Partnerships and STPR2, than truly expressing the spatial ambitions of these regional initiatives and flowing through into LDPs. It should be noted that Regional Spatial and Economic Strategies form a core part of the Implementation Roadmap for the Irish National Planning Framework¹.

Intentions have been set out in the Delivery Programme for a move from policy development to policy delivery at PARAD. We would welcome more detail on what is meant by policy delivery in this context. With the NPF4 to be part of the statutory development plan, RTPI Scotland would in particular wish to see development management guidance produced to build upon and develop the 'how to use' section to support decision makers through the new process. This could ensure that in the transition to the new Framework, decision making is consistent and does not need to follow a case law approach. We are concerned that, as set out in the Action table, guidance relating to a number of new policy requirements in the NPF4 will not be produced in the short-term, which could exacerbate issues for decision makers during the transition period.

Infrastructure and Funding

RTPI Scotland is disappointed that no capital investment programme has been published alongside the Framework, as has been done through the Irish National Development Plan². However, we do understand and support the intentions of the NPF4 to be aligned other national plans, programmes and strategies - particularly the Infrastructure Investment Plan (IIP), the Strategic Transport Projects Review 2 (STPR2) and the National Strategy for Economic Transformation (NSET). The main disadvantage of this approach is around sequencing issues with the STPR2 and NSET already published and the next iteration of the IIP yet to be drafted. We understand that the intention is to position the Planning, Infrastructure and Place Advisory Group as central to the production of the next IIP and we welcome this. However we would wish to see thinking on how this will work in practice further developed. RTPI Scotland wishes to be included as an active and contributing member of this group. We also await further detail as to how the Advisory group can shape and influence the delivery plans of the NSET and the STPR2. RTPI Scotland believes that the NPF4 oversight bodies, including the Office of the National Planning Improvement Coordinator, should have a key role in ensuring alignment between the NPF4 and emerging national plans, programmes and strategies.

¹ <https://npf.ie/wp-content/uploads/NPF-Implementation-Roadmap.pdf>

² <https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/>

A list of funding programmes is given including:

- Place-based investment programme
- Vacant and Derelict Land Investment Programme
- Strategic Transport Funding
- Affordable Housing Supply Programme
- City Region Deals and Regional Growth Deals

RTPI Scotland supports, at an absolute minimum, the consideration of how delivery of the NPF4 can be supported by funding streams. We wish to see the inclusion of Levelling-Up funds in the list provided. We also welcome the reference to the Place Principle as providing the framework for choreographing sectoral strategies and funding programmes. We note the intentions are to agree and factor in funding requirements derived from the NPF4 into the Capital Spending Review and through the annual Budget process, but would wish to see how key stakeholders can be included in this process.

Resourcing

Considering the fundamental need to resource planning authorities effectively to support the delivery of the NPF4, the section relating to resources in the Delivery Programme is needs strengthened. As set out in the section relating to the BRIA, we do not think that the true real-world costs of delivering the Framework have been put forth. This needs to be considered against the wider context of existing issues for resourcing of the planning system identified by our research³. Regarding planning fees, we continue to advocate for a move to full cost recovery, something which needs to be more firmly covered in the delivery programme. On top of this, we would also advocate for an annual uplift based on inflation and the provision of a mixture of local government block grant funding and/or other funds to meet a range of additional new and unfunded duties resulting from the Planning (Scotland) Act 2019⁴, including additional resource burdens from new and expanded policies in the NPF4. The need to bring in new resources to the planning system will be particularly important during the transition period, as a raft of new generation LDPs begin to be prepared and development management processes adjust to new and expanded duties.

The need to resource the planning system appropriately to deliver the NPF4 includes strong consideration of workforce planning and skills needs and includes implementing actions set out in the recently published Future Planners report⁵. We believe that resourcing, skills and workforce planning need aligned due to inextricable link between these areas of consideration. To achieve this, RTPI Scotland wishes to again advocate for the inclusion of a comprehensive skills and resource strategy in an updated Delivery Programme. Such examples can be seen in other sectors, for example, the recently published national health and social care workforce strategy⁶.

³ <https://www.rtpi.org.uk/research/2021/june/resourcing-the-planning-service-key-trends-and-findings-2021/#:~:text=RTPI%20Scotland%20research%20has%20shown,economic%20benefits%20to%20planning%20applicants>

⁴ <https://www.rtpi.org.uk/research/2021/november/funding-the-planning-service-2021/>

⁵ <https://www.rtpi.org.uk/media/12040/future-planners-project-report.pdf>

⁶ <https://www.gov.scot/publications/national-workforce-strategy-health-social-care/pages/8/>

Monitoring, Evaluation and Corporate Influence

We understand that the LGHPC will report on the NPF4 once a year. We welcome the current opportunity to set in place a framework for this process that achieves maximum value in supporting the delivery of the NPF4. Thus, we look forward to working closely with the committee on such matters. The Institute understands that part of the remit of the proposed Planning, Infrastructure and Place Advisory Group is to oversee and advise on the delivery NPF4. RTPI Scotland supports this approach but wishes to see proposals developed further to consider how the Advisory Group would engage and align with the work of other oversight bodies, including Scottish Government, the LGHPC, the High-Level Group, the Key Agencies Group, the Infrastructure Delivery Group and the Office of the National Improvement Coordinator (ONPIC). In particular, the RTPI Scotland believes there should be careful consideration on how the ONPIC can contribute as an oversight body. To do so it is critical that appropriate resources are allocated. RTPI Scotland have set out the potential resourcing requirements and suggested roles and responsibilities for this emerging role in a recently published think piece⁷.

RTPI Scotland also wish to see more consideration in the Delivery Programme of how we can achieve corporate buy-in to the Framework across government and key stakeholders. As discussed in reference to infrastructure funding and alignment, monitoring the delivery of the NPF4 needs to include consideration of broader government activity in this process, to ensure new and existing funding streams and strategies are making a strong and clear connection to the NPF4. We must ensure that the Framework plays an important role in governance and serves as the core of future policy development in Scotland. To do so, it is critical that we achieve buy-in from all Cabinet Secretaries and the Framework regarded as the 'First Minister's document'. We shall again advocate for the approach taken in the Irish National Marine Planning Framework, which at the point of adoption, had An Taoiseach and fellow Ministers (the entire Irish Cabinet) set out its relevance and importance to their respective portfolios⁸.

We hope the current parliamentary scrutiny period ensures full consideration and buy-in across parliament, helping MSPs make a direct connection of the Framework and the future vision to their respective constituencies and in the preparation of future plans and strategies. This will provide the additional benefit (as national policies approaches will be established in the NFP4) of supporting Scottish Government in developing new plans and strategies which can build upon established policy principles in developing new plans and strategies, rather than re-examining them through consultation. Such an approach could expedite, for example, preparation of the impending National Marine Plan 2.

It is also important that we consider the importance of corporate influence and awareness of the NPF4 in local government. To achieve this, RTPI Scotland wishes to see more thinking set out regarding the critical role of Chief Planning Officers (CPOs) in promoting the new Framework within their respective authorities but having strategic oversight of the new and expanded policies areas. We recognise the opportunity to develop this area in the impending publication of guidance on CPOs and would refer the committee to work we have published on the matter previously⁹.

⁷ <https://www.rtpi.org.uk/policy/2021/september/the-office-of-the-national-planning-improvement-coordinator/>

⁸ <https://www.gov.ie/ga/preasraitis/eef3c-taoiseach-and-ministers-launch-national-marine-planning-framework-and-publish-maritime-area-planning-bill/>

⁹ <https://www.rtpi.org.uk/policy/2021/october/chief-planning-officers/>