



RTPI Scotland

mediation of space · making of place

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Dear Sir/ Madam

**NATIONAL PLANNING FRAMEWORK 3 MAIN ISSUES REPORT AND DRAFT
FRAMEWORK**

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2,200 members in Scotland and a worldwide membership of nearly 23,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places in Scotland; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

The Institute is grateful for the opportunity to comment on this consultation, and I attach the Respondent Information Form accordingly. We would like to make some additional comments which are contained in this letter.

CONNECTING NPF3 AND SPP

RTPI Scotland believes that planning has an important role in supporting Scottish Government's ambitions on sustainable development, sustainable economic growth,

engagement, climate change, placemaking and well located new development. We are pleased that Scottish Government is committed to the 3rd National Planning Framework (NPF3) and revised Scottish Planning Policy (SPP) and that it recognises the key role they can play and the added value that they can bring.

We welcome the draft documents and the ambitions that they set out. RTPI Scotland is committed to maximising the benefits from NPF3 and SPP. For this to happen we believe that we need to build on the many good things contained in the documents and, in doing this, Scottish Government needs to look to use them, and the other tools they have at their disposal, to provide:

- **certainty** for planning authorities, developers, investors and communities. This requires NPF3 and SPP to:
 - provide a framework to enable delivery by including a delivery focused Action Programme for both documents that links to, and influences decisions on, resources.
 - outline clear policy and geographical priorities that indicate the implications of the documents for specific sectors or areas of Scotland.
 - be thought of as an investment strategy as well as a planning document, that highlights future opportunities and assets that are to be valued.
- **clarity** of ambition. This requires NPF3 and SPP to:
 - clearly set out the high level ambitions they are trying to achieve and planning's role in supporting this.
 - set out the indicators that will be used to monitor progress.
 - include precise and unambiguous wording that is not open to interpretation.
- a **clear hierarchy** for visioning and decision making. This requires Scottish Government to clearly set out, and differentiate between:
 - the policies/ strategy in place to achieve the outcomes they aspire to. These should be the main thrust of NPF3 and SPP.
 - the means of delivering these, which should be contained in the joint Action Programme.
 - guidance on definitions and technical aspects in place to support delivery, which should not be in main body of SPP or NPF3.
- a framework that allows Scottish Government and its Agencies, planning authorities and those engaging with the planning system to **work more smartly**. This requires:
 - NPF3 and SPP to work towards achieving the same outcomes and to work to the same timescales. SPP should outline how these will be achieved and NPF3 should set out where they will happen. Both documents should be looking to a 20 -30 year timescale, should be reviewed at the same time, and, should be published at the same time. Pushing the publication date of SPP back to the same time as NPF3 will allow for the documents to be explicitly linked to one another.

- NPF3 and SPP to provide a context which focusses the work of Scottish Government, Key Agencies and planning authorities on those tasks that add value so as to make best use of limited resources.
- Scottish Government to ensure that NPF3 and SPP are corporate documents that influence other key Government strategies such as, for example, the National Marine Plan, the Infrastructure Investment Plan and the Land Use Strategy.

THE ADDED VALUE OF PLANNING, PLANNERS AND THE PLANNING SYSTEM

The Institute believes that NPF3 should be a truly ambitious national plan which establishes key objectives for Scotland in the short, medium and long term and how these will be delivered spatially. NPF3 provides a real opportunity to achieve ambitions such as sustainable development, sustainable economic growth and tackling climate change. Those countries that have successfully planned for sustainable economic growth - such as the Netherlands, Norway and Sweden – have combined an approach which sets priorities and drives action from a national level down along with ‘bottom up’ community engagement and empowerment. They have explicitly embraced national and strategic planning as a mechanism to achieve this. They have used the planning system as a means of demonstrating national leadership through setting out their ambitions for the country and for making often difficult decisions that can bring short, medium and long term benefit.

We also commend Scottish Government for entering into wide ranging and in-depth engagement with the planning profession on the development of the document. We have been pleased to support this through holding events with each of our Chapters and the Scottish Young Planners’ Network. These have helped to inform our response. We have also used the RTPi Scotland journal Scottish Planner to stimulate debate on NPF3 where we asked 10 Young Planners to discuss how to achieve a number of outcomes through NPF3 and the revised SPP. You can read this at http://www.rtpi.org.uk/media/560599/scottish_planner_june_13.pdf.

PRINCIPLES FOR AN EFFECTIVE NPF3

As you may know, prior to the publication of the draft NPF3, RTPi Scotland set out 10 principles that we believe should be applied to the document. These are that NPF3:

1. is ambitious
2. prioritises
3. integrates
4. is influential
5. is clear and holistic
6. focusses on delivery
7. is based around outcomes
8. is directly linked to the revised Scottish Planning Policy (SPP)
9. provides clarity on where it links with other policy, guidance, advice and good practice.
10. is based on sound evidence and needs to be monitored to ensure it continues to be fit for purpose.

ROLE AND STRUCTURE

Ambition

We are pleased that Scottish Government has set out the first steps in what should be an ambitious national spatial plan. The document provides a good indication of the key issues facing Scotland over the next 20 to 30 years, the spatial implications of these, and the approaches to be taken to dealing with them.

RTPI Scotland also commends Scottish Government for the efforts it has put into generate debate on NPF3 amongst the planning profession, business, communities and politicians. This debate has been framed within an ambitious context and presented NPF3 as an important and influential document that people and organisations should engage with.

We are pleased that the draft NPF3 has flagged some of the key questions that need to be asked. It is vital that the finalised document clearly presents answers to these. It must be seen as a strategy which clearly articulates those areas where investment is promoted and required, and, those places that should be protected. This will require the finalised NPF3 facing up to often difficult decisions where there will be winners and losers. It will benefit no-one if these are ducked as developers, investors and communities need clarity, certainty and predictability.

Although we do not want to comment on specific proposed National Developments, we wonder if those that have been identified are short term in their outlook and are developments which, in the main, have already been identified as priorities. The long term nature of NPF3 means that it should be looking to identify those which are at the next stage to ensure that the planning system can enable them to be delivered.

There is also very little mention of the wider legacy that will accrue from NPF3 both in terms of National Developments and broader objectives and aspirations.

Influence

NPF3 should lead, rather than follow. It should be seen as the key spatial plan for Scottish Government and therefore should ensure that the Government's various strategies and subsequent resource allocation are taken forward within the context of NPF3. We appreciate the valuable work that has been undertaken by the Minister for Local Government and Planning and Scottish Government officials to raise the profile of NPF3. By its nature, NPF3 must be cross cutting and embedded within all aspects of Scottish Government activity that have spatial implications.

However, we are unsure as to how much influence NPF3 actually has within Scottish Government and are concerned that although it is acknowledged by a range of Scottish Government strategies, it is not necessarily *embedded* within them. We have particular concerns over the lack of 'read-across' between NPF3 and the forthcoming Marine Plan for Scotland and the Infrastructure Investment Plan, and, the need for NPF3 to influence the priorities and resource allocation of Government's Key Agencies to enable development. Given this, we feel that the document that should also be promoted by the highest level of Minister/ Cabinet Secretary and Official.

RTPI Scotland has welcomed the engagement undertaken by the Minister for Local Government and Planning and his officials with the business community. This is vital if

they are to see NPF3 as a document that provides certainty and predictability to help their planning and decisions on investment. Current economic circumstances mean that NPF3 needs to promote a collaborative approach between public, private and third sector organisations where risk and rewards are shared.

Delivery

RTPI Scotland feels that NPF3 should provide the spatial context for delivering specific national targets, framed within a number of national outcomes, which are set out in a revised Scottish Planning Policy (SPP). These targets could be derived from existing national targets and could cover, for example, housing numbers, energy, renewables developments, waste and derelict land. NPF3's role is to set out the spatial implications of these targets across Scotland and to establish how best they are delivered. In many ways this will need NPF3 to ensure that it provides the rights conditions to ensure that these targets can be delivered. We need to ensure that NPF3 is seen as an implementation tool as much as a strategy.

We are pleased to hear that the finalised NPF3 will include an Action Programme along the lines of those in strategic and local development plans. This should help ensure that the document promotes development which is deliverable.

However, there is still a need to make the connection between aspirations set out in NPF3 with resources that can enable these to be delivered. This is why it is vital that the document is embedded across Scottish Government and used in the forward planning of Key Agencies, utility companies, investors and communities. It also means that we need to look beyond the planning system as the only tool in delivering development - NPF3 should better link together development proposals with resourcing and paving initiatives including Tax Incremental Financing, Compulsory Purchase Orders and Prudential Borrowing. This will also require a more explicit link between development and infrastructure provision.

Another key point that should be given more prominence in the document is that successful and sustainable development it is often about making the best use of the assets and infrastructure that are already in place, rather than building new things.

Outcomes

RTPI Scotland is pleased that it is proposed that NPF3 takes a more outcome focussed approach to outlining its ambitions. However, we feel that it is necessary for these outcomes to be the same as those to be adopted for the revised Scottish Planning Policy document, with NPF3 setting out where and SPP setting out how and why. We also feel that the document could do more to embed the outcomes approach so as to help to demonstrate how the planning system contributes to key priorities and provide a more holistic basis upon which to plan Scotland.

Clarity

We feel that the draft NPF3 has gone some way to provide clarity on the ambitions proposed by Scottish Government. The structure, look and feel of the document is welcomed. We would encourage Scottish Government to build upon this as they move towards producing the final version. There may be opportunities to think more creatively about the format of the document – could it be designed as an online document first,

rather than hard copy? If this was done it may allow more scope or introducing video, links to other documentation, case studies etc.

Linkages

We think that there should be a clear statement at the start of the document about its status and the relationship it has with other Scottish Government planning documents including the revised Scottish Planning Policy; the Architecture and Place Policy for Scotland; Designing Streets; Designing Places; Scottish Historic Environment Policy; Letters issued by the Chief Planner; Circulars; good practice and guidance published by other parts of Government and by Key Agencies.

Evidence Base and Monitoring

RTPI Scotland is of the view that a sound and transparent evidence base must be in place to demonstrate why policy directions and priorities have been taken in the NPF3.

We appreciate that regular Monitoring Reports will be published but feel that more could be made out of the Annual Report given to Parliament on the Action Plan. This may provide a more current idea of trends and enable Scottish Government to assess whether amendments need to be made to NPF3. There is an opportunity to better define the indicators that are required to monitor NPF3 and SPP, and link these with emerging indicators at the strategic development planning level.

STRATEGY

General

RTPI Scotland welcomes the broad direction of travel set out the document's key themes of a low carbon place; a natural place to invest; a successful, sustainable place; and a connected place. We would however like NPF3's outcomes to be the same as those to be adopted for SPP. Given this we suggest that the Principal Policies within the draft SPP would be more appropriate as Planning Outcomes, representing the overarching themes that planning seeks to achieve, with subject policies following these overarching outcomes within the document:

- sustainable economic growth
- sustainable development
- effective engagement
- reduced climate change
- quality places
- well located new development

We also feel that the document could do more to embed the outcomes approach so as to help to demonstrate how the planning system contributes to key priorities and provide a more holistic basis for planning policy in Scotland. We would, however, like to see these framed as outcomes and would suggest that they follow our proposals in to SPP with

We welcome the ambitions and opportunities set out the document and are pleased that although much of this is contextualised in current economic circumstances, the aims focus very much on the longer term.

A Low Carbon Place

Reducing Energy Demand

We are pleased that this section is at the start of the Low Carbon Place chapter. Reducing demand for energy should be starting point for activity, with perhaps more prominence given to retrofit.

Heat

RTPI Scotland supports the concept of tackling issues in reducing heat demand. Planning undoubtedly has a role to play in this, be it through promoting Combined Heat and Power and higher density developments, but is there a role for NPF3 to provide more details on what 'enabling conditions' planning can put in place to support this? Also, should NPF provide more detail on potential growth areas for district heating rather than only setting out those already in place or planned?

Onshore Wind

We welcome the approach whereby a number of designated areas, including wild land, are to benefit from greater protection from onshore wind development. However we feel that there may be a missed opportunity to provide a more effective and explicit spatial strategy for onshore wind developments which clearly sets out those areas where they cannot be built, those where they may need to be discussed and those where they would be welcomed, perhaps through a 'traffic light system'. We also feel that there is a need for greater clarity if different approaches are intended depending upon the scale of development taking place. For example are single wind turbines not to be allowed in specific areas? What is the definition of 'wind farm'?

These would provide real clarity for planning authorities, developers, landowners and communities and show areas of potential, as well as areas of protection. RTPI Scotland has already published a paper which deals with this issues which we would recommend:

- Meeting the 2020 Renewable Energy Targets – Is Planning Part of the Solution? (see [http://www.rtpi.org.uk/media/1400022/briefing - 2020 renewables target - 28 june 2012.pdf](http://www.rtpi.org.uk/media/1400022/briefing_-_2020_renewables_target_-_28_june_2012.pdf))

The map showing core areas of wild land published by Scottish Natural Heritage is referred to in paragraph 2.20. Has this been subject to consultation, and if not, is it intended to do this?

Offshore Renewable Energy/ Broader Marine Planning

We are worried that there is not enough integration between the draft NPF3 and the forthcoming Marine Plan for Scotland. These should have been published in tandem given that they should clear and strong links between them. The fact that this hasn't happened highlights that they do not appear to be being developed in an integrated way. Although there are references in the draft the Marine Plan in NPF3, there is no clear indication of how each will impact on one another. The impact of offshore development will be felt onshore and vice versa and we are concerned that this is not fully recognised in the document.

We are also concerned that NPF3 tends to look at the links between land and sea mainly in terms of infrastructure for offshore renewables. The impact of offshore developments may well have broader impact for coastal communities in terms of employment opportunities, associated housing development, community facilities etc. This needs to be explored in more detail in NPF3 and the National Marine Plan. It is not helpful that the draft National Marine Plan was not published alongside the draft NPF3.

Unconventional Gas

RTPI Scotland remains to be convinced of the benefits of 'unconventional' gas, and we feel that this requires further evidence before the decision is made to enshrine this technology within national planning policy.

Community Ownership

RTPI Scotland supports measure to encourage community benefit arising from, and ownership of, renewable energy development.

Retaining the Benefits from the Energy Sector in Scotland

Ensuring a link between the National Renewables Infrastructure Plan (NRIP) and NPF3 is vital. However NPF3 must be able to influence the location aspects of NRIP.

A Natural Place to Invest

Key Assets

RTPI Scotland welcomes the fact that NPF3 promotes our natural environment as providing 'assets'. Key to promoting their sustainable use is to ensure that key rural strategies recognise the role of spatial planning and embed the aspirations and proposals contained in NPF3. A number of these strategies have either been published recently or are in development and there are concerns that they do not do this to the extent required.

Tourism, Recreation and the Visitor Economy

The Tourism Development Plan, currently being developed by VisitScotland, needs to be taken forward in conjunction with NPF3 so as to ensure that they complement one another.

A Successful, Sustainable Place

A Sustainable Settlement Strategy

As currently drafted there is no real flavour of how NPF3 will impact on settlements of different scales. Given this we wonder if it would be useful for the finalised NPF3 to provide a more detailed breakdown of how it will impact on different areas of Scotland and what the broad approaches should be for each of these? This could look at city regions, cities, towns, villages, remote areas, coastal communities and the sea. It should outline clear geographical priorities that indicate the implications of the document for specific areas of Scotland.

RTPI Scotland is concerned that draft NPF3 does not do enough to recognise the important role of cities and city regions. These were identified as key drivers of the economy in the Cities Review. The final version of NPF3 needs to set out the key benefits of investing in cities and city regions, the benefits that this can bring and the fact that they can often provide sustainable solutions. The city regions should be mapped out

in the document and the characteristics, ambitions, needs and opportunities should be detailed. This could then lead on to the establishment of a comprehensive settlement strategy for Scotland setting out principal towns, town centres, and remote settlements. Again the broad characteristics, ambitions, needs and opportunities could be set out to show investment opportunities.

We feel that finalised NPF3 must set out clearer context for regeneration activity across Scotland. As currently drafted the document does not give a clear indication of the spatial priorities for regeneration across the country. Nor does it provide a clear steer on the need for development to take place on brownfield/ previously used land. NPF3 should also set out where there are areas of vacant and derelict land across Scotland and possible resourcing to support its remediation.

Green Networks

RTPI Scotland welcomes the aim of expanding green networks, where they are lacking or poorly connected. These must incorporate green spaces and green infrastructure.

Homes

There is a need for NPF3 to be more explicit in setting out how infrastructure will be developed over its time period and how this can be best used to ensure that housing is developed in the most sustainable locations. NPF3 should have a key role in influencing the location of infrastructure so that enables sustainable developments. It should also identify where there is infrastructure already in place that can be used to support development.

If infrastructure provision was viewed in this wider way, it would also lead to associated rises in land values which could be used to support funding of housing and other developments.

A Connected Place

Reducing the Need to Travel

RTPI Scotland supports the role of NPF3 in providing a national spatial context which can allow us to plan for reducing travel.

Our points already made above on the need for NPF3 to work more closely with other key Scottish Government strategies is particularly important regarding transport infrastructure.

We believe that there is a need to examine the opportunities arising from digital communications, how planning can help pave the way for their development where appropriate, and the impacts that this may have in terms of travel and settlement patterns.

The finalised NPF3 should outline in more detail how it can support increasing cycling and walking.

I trust that you will find these comments helpful. If you would like to discuss any aspect, or require clarification of any points raised, please contact me on 0131 229 9628 or by email to craig.mclaren@rtpi.org.uk .

Yours sincerely

A handwritten signature in brown ink, appearing to read 'Craig McLaren', with a stylized flourish at the end.

Craig McLaren
National Director