

Consultation Response

National Performance Framework: Inquiry into proposed National Outcomes

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Question 1: What are your views of this updated purpose for the National Performance Framework?

It is proposed to streamline the purpose of the NPF with a renewed focus on wellbeing. Given that the NPF is regarded as Scotland's "wellbeing framework", and the intention to introduce a new Wellbeing and Sustainable Development Bill, we appreciate the logic of this proposal.

This updated purpose would reposition the existing NPF purposes of "successful country", "opportunities to all people", "sustainable and inclusive growth" and "reduce inequalities" within the National Outcomes. Consequently, instead of sitting alongside "wellbeing" within the purpose of the NPF, these current purposes would be seen as a way to achieve this overarching "wellbeing" objective.

Given the above, we do not believe this updated purpose represents a watering down of the NPF, and in our view it has the potential to ensure there is close alignment between the NPF and the future Wellbeing and Sustainable Development legislation, which was consulted on earlier this year. [In our response to that consultation](#), we agreed that a statutory definition of "wellbeing" should be included in any future legislation. We believe this will be particularly important if this updated purpose is adopted.

In our response, we also highlighted that "wellbeing" is a broad, multifaceted, and often intangible term that goes beyond the consideration of material wealth. Wellbeing encompasses multiple and interconnecting factors – including physical, social, mental, emotional, and environmental factors. Wellbeing can be considered in terms of an individual or a collective and is a highly subjective term, meaning different things to different people and groups of people. It is, therefore, a difficult term to pin down in a simple definition and to do so would be potentially counterproductive. In our response, we recommended that instead of setting rigid limits around the term "wellbeing" through a one or two sentence definition within the legislation, that "wellbeing" be pursued through achievement of the National Outcomes of the NPF. In our opinion, this would allow for recognition of the fluid and often intangible nature of "wellbeing", allowing for continued review and adaptation as necessary to cater for the changing needs of Scotland and its communities over time.

In the above context therefore, we believe it is appropriate for the updated purpose to be adopted, with the National Outcomes acting as the guiding principles which define "wellbeing" both in the NPF and in the Wellbeing and Sustainable Development (Scotland) Bill.

Question 2: In your view, do the proposed National Outcomes match the purpose of the National Performance Framework? Please explain your answer

We broadly agree that the proposed National Outcomes match the purpose of the NPF. We take this opportunity to highlight that the planning system has the potential to



contribute towards each of the proposed National Outcomes both directly and indirectly as a result of its role in shaping places.

We are particularly pleased to see the inclusion of Climate Action as a separate National Outcome. In our [response to the National Outcomes Call for Evidence](#) in June 2023, we highlighted that our current ambitions to tackle the climate and nature emergencies and to deliver the country's net zero targets are only weakly touched upon within the current NPF. We believe that the inclusion of an additional National Outcome to fill this gap, supported by appropriate National Indicators and the Implementation Plan, will assist the planning sector in the delivery of Scotland's Fourth National Planning Framework.

We are also supportive of the inclusion of a Housing National Outcome. This is particularly important given the national housing emergency declared by the Scottish Government on 15 May 2024, and the rising number of Local Authorities that have declared their own housing emergencies in recent months.

We are pleased to see that the detailed description associated with this proposed Outcome acknowledges the importance of housing in all tenures (including social housing) to support the needs of individuals at every life stage. In our [response to the Scottish Parliament's inquiry into Housing to 2040](#), we highlighted that we are not building enough homes in Scotland, but that the factors contributing to this shortfall vary significantly across Scotland. In our response, we identified a number of barriers, including:

- Variability in land value and in the viability of market housebuilding
- Pressure from other uses (e.g. tourism, commercial development, student housing) in areas of high demand
- Vacant/derelict land with remediation requirements
- A lack of understanding of the impact of changing demographics on housing needs and design to enable an appropriate mix of housing in communities to allow (for example) aging in place.
- The misalignment that can often exist between planning and building standards which can cause tensions that result in them working against each other.

Such tensions can be resolved through collaborative working through the Place Principle, which is an overarching concept which is clearly aligned with the National Outcomes. However, if the Place Principle is to be effective there is a need to 'give it teeth' and operationalise and monitor its work so it influences policy, practice, and investment on the ground. There is opportunity to do this by embedding the Place Principle into the National Outcomes, Indicators, and Implementation Plan through this review process. The importance of collaborative working cuts across all the National Outcomes. Despite this, reference to the Place Principle is noticeably absent from the proposed National Outcomes, resulting in an unacceptable policy disparity at the national level. To give the Place Principle the necessary weight required to facilitate its enactment on the ground, it is essential that it be embedded into the vision, outcomes and indicators of the NPF. To further support this, RTPI Scotland also considers it vital that there be a duty on statutory bodies to report on their implementation of the Place Principle, including the actions they have undertaken and the monitoring of their success (or otherwise). Such a duty would be a significant step towards a transparent process for understanding if, where, and how the Place Principle has been applied and, we would argue, is essential if the Place Principle is to have the kind of meaningful and positive impact on Scotland's places, people and communities that the Scottish Government and COSLA envisaged when this Principle was first adopted.



Question 3: What do you think of the changes being proposed?

We are broadly supportive of the proposed changes to the National Outcomes. As mentioned in our response to the previous two questions, we are supportive of the inclusion of the proposed Climate Action and Housing National Outcomes and the proposed new NPF purpose to align it with the Wellbeing and Sustainable Development (Scotland) Bill. It will be important for the national indicators to be appropriately revised to cater for the new and amended Outcomes, and for the proposed Implementation Plan to clearly identify the actions, responsibilities and timescales for achieving the outcomes (see our response to Question 9 for further details).

The National Outcomes do not each stand alone. They are all interconnected and must be viewed as such if they are to be successfully implemented. As already stated, the planning system has an important role to play in achieving all the National Outcomes (both directly and indirectly). Scotland's Fourth National Planning Framework includes many policy priorities which, when working together, have the potential to achieve the overarching wellbeing purpose of the NPF. These include (but are not limited to) the Infrastructure First policy, the 20-minute Neighbourhood and Local Living policy, and the Town Centre First policy.

There are spatial demands and implications associated with each one of the proposed National Outcomes. However, this has not been fully reflected in the proposed changes to the National Outcomes. For example, there is currently no mention in the proposed "Care" National Outcome about the infrastructure that will be required to provide the different types and levels of care that people need, and to support those providing care. Whilst infrastructure is referenced within the "communities", "housing" and "health" National Outcomes, for carers (both paid and unpaid) to provide an effective level of care, it is essential that they have access to the right social and physical infrastructure to support them as well as those who are in their care. It cannot be assumed that these requirements are fully encompassed within the "communities", "housing" and "health" National Outcomes. Instead, it is important that all of the National Outcomes acknowledge the spatial requirements and implications for their delivery to better recognise the close ties between the NPF, the planning system and other built environment processes, policies and mechanisms.

Question 4: Are there any policy priorities that should be reflected in the proposed National Outcomes but which, you consider, are not?

As previously mentioned, the planning system has the potential to contribute towards each of the National Outcomes both directly and indirectly as a result of its role in shaping places. Scotland's Fourth National Planning Framework includes many policy priorities which, when working together, have the potential to achieve the overarching purpose of the NPF. These include the Infrastructure First policy, the 20-minute Neighbourhood and Local Living policy, and the Town Centre First policy (to name a few). However, for the planning system to meaningfully contribute to the successful delivery of the NPF, greater attention needs to be placed on place-based collaboration through the Place Principle. As mentioned in our response to Question 2, reference to the Place Principle is noticeably absent from both the current and proposed National Outcomes. In our view, this absence represents an unacceptable policy disparity at the national level. To give the Place Principle the necessary weight required to facilitate its enactment on the ground, it is essential that it be embedded into the National Outcomes, Indicators and Implementation Plan.



Question 5: What are your views on the Scottish Government's consultation on the proposed National Outcomes? In deciding on its proposed National Outcomes the Scottish Government must consider how the outcomes will reduce inequalities.

No comment

Question 6: How do you think the proposed National Outcomes will impact on inequality?

The proposed National Outcomes have the potential to impact positively on the reduction of inequality in a variety of different ways.

This positive impact can only be fully realised if the NPF is embedded in our working practices and effectively monitored. RTPI Scotland has, for many years, advocated for the recasting of planning performance measurements to be more focused on outcomes which look beyond simple metrics like speed of processing applications and number of housing units delivered. We see the work of the National Planning Improvement Champion (NPIC) to create a new National Planning Improvement Framework (NPIF) as intricately linked to the successful delivery of the proposed National Outcomes. The aim of the NPIF is to assist local planning authorities to assess their performance and support them in developing and implementing improvement actions plans. The performance of local planning authorities has important implications for the successful delivery of spatial outcomes on the ground that will support the delivery of the proposed National Outcomes across Scotland's communities. In our response to the consultation on the Wellbeing and Sustainable Development (Scotland) Bill we highlighted the importance of any future Commissioner working closely and actively engaging with the planning sector and the NPIC.

We also take this opportunity to highlight the critical role of the National Indicators and proposed Implementation Plan on the ability of the proposed National Outcomes to have positive impacts on the ground. We understand that a review of the National Indicators will be undertaken following a revised set of National Outcomes being agreed with Parliament, and that an implementation plan for the NPF will be developed to set out a delivery pathway for a wide range of stakeholders. In our view, these next steps will be critical to ensure that the revised National Outcomes (and NPF as a whole) has sufficient 'teeth' to deliver positive impacts on the ground. We therefore eagerly await these next steps and would welcome the opportunity to work with the Scottish Government in ensuring the National Indicators and Implementation Plan are fit for their intended purpose.

In the above regard, we reiterate that the spatial implications of delivering the NPF must be fully recognised and embedded into the National Outcomes, Indicators and Implementation Plan. The Place Principle is an effective means through which this can be achieved, but reference to this important approach to placed-based collaborative working is noticeably absent from the current NPF and from the proposed National Outcomes. This represents a policy disparity at the national level that in our view must be addressed if the Place Principle is to have the necessary weight required to facilitate its enactment on the ground.

Question 7: Do you think the proposed National outcomes align with the UN Sustainable Development Goals? Please explain your answer

We broadly agree that the proposed National Outcomes align with the UN SDGs. We do, however, recommend that the final paragraph of the revised “Environment” National Outcome be amended to read as follows (with the suggested addition in **bold**):

“Access to a healthy, high-quality environment is a right available to all, and we enjoy our landscapes, coastline and green **and blue** spaces responsibly.”

Although marine areas are referenced earlier in the “Environment” National Outcome, we believe the inclusion of blue spaces in this final paragraph will enhance this National Outcome’s alignment with SDG 14.

Question 8: To what extent do the proposed National Outcomes support joined-up policy making in Scotland? The Scottish Government has committed work with wide range of others during the development of an implementation plan to ensure the success of the National Performance Framework across the Scottish Government, the wider public sector and beyond.

The National Outcomes have considerable potential to support joined-up policy making in Scotland. As previously mentioned, the proposed National Outcomes are themselves joined-up and intricately connected. Consequently, their successful delivery will rely upon all sectors, as well as policy- and decision-makers working collaboratively to deliver their objectives.

We reiterate that the planning system is supportive of the NPF’s collective purpose and has a critical role to play in implementing the proposed National Outcomes. However, to ensure it can deliver, it is vital that it be resourced effectively. RTPI Scotland has previously reported on [the current state of the planning system’s diminishing resources](#) and we welcomed the recent Scottish Government consultation on Investing in Scotland’s Planning System. The actions taken moving forward from this consultation will have a critical role to play in ensuring the planning system is fit for purpose in delivering the NPF and proposed National Outcomes.

Linked to the above, the way we implement the National Outcomes and measure our performance through the proposed Implementation Plan and revised National Indicators will be crucial to the successful delivery of the NPF. We would welcome the opportunity to work with the Scottish Government on these next steps of the review process.

Question 9: What should the implementation plan contain to make sure that the National Outcomes are used in decision-making?

We are generally supportive of the development of an Implementation Plan to sit alongside the revised NPF. For this Plan to add value to the NPF as an effective delivery tool, it will be important that it takes the form of a comprehensive delivery map across all the National Outcomes. This must include:

- **Clear Actions** – identifying the actions (and sub-actions) required to drive forward each National Outcome, including any crossovers given the inter-related nature of the National Outcomes.
- **Existing or New** – identifying which actions are already part of existing work programmes (for example, the work currently being undertaken by the NPIC), and which actions have been introduced by the Implementation Plan to fill an identified gap.



- **Responsibilities** – identifying who the lead agency and key delivery partners are for each action.
- **Action Priorities** – identifying which actions should be given priority and which are secondary actions.
- **Action Timescales** – identifying the actions that can be delivered in the short-medium- and longer- terms.
- **Spatial Context** – identifying the spatial context for each action. i.e. which actions are being undertaken in which parts of Scotland and at what spatial scale (local, regional, national)
- **Resourcing Needs** – identifying the resource implications for delivering each action including any resource gaps that could hinder implementation.
- **Skill Requirements** – identifying the skills required to deliver each action, including any skills gaps that need to be addressed for successful implementation.

If the Implementation Plan is set out as a comprehensive roadmap for the delivery of the NPF, then it could help to drive forward the NPF's implementation. It could also be used to identify the challenges of delivering the NPF, and to make a clear case for joined-up working practices across and between government departments, sectors and disciplines in a clear and transparent way.

It is important that the Implementation Plan has a strong foundation built on evidence and analysis. There are many individuals and organisations already undertaking important work to deliver on the proposed National Outcomes (including those working in the planning sector) and it is vital that this is recognised and highlighted within any future Implementation Plan.