

Call for Views Response

Scottish Government's Fourth National Planning Framework

About the RTPI

The RTPI Champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that provide our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

The NPF4 Annual Review Process

RTPI Scotland welcomes this further review of NPF4, which the Local Government, Housing and Planning Committee committed to undertake on an annual basis to monitor the progress being made to achieve NPF4's outcomes.

We fully support this annual review process and were delighted to be involved in the Committee's evidence session on 7 May last year as part of its first such review.

Before commenting on the specific themes outlined in the Committee's call for views, we take this opportunity to highlight that this annual review process is equally as important to ensuring the successful implementation of NPF4 as the other points raised in this submission. The outcomes of the annual review have the potential to influence our understanding of NPF4's impact and the progress we are making and challenges we are experiencing in enacting NPF4 policies. The review also has the potential to influence our approach to the implementation of NPF4 moving forwards. Consequently, it is vital that these annual reviews are undertaken with a clear purpose, structure and focus, and that they produce clear findings and recommendations that provide a solid foundation upon which subsequent reviews can then build.

Whilst we acknowledge there has been much activity since last year's review of NPF4, it is unclear exactly what has resulted directly from the review process. Following the conclusion of last year's review, we are aware that the Committee wrote to the Minister for Public Finance (in June 2024) setting out areas of concern, which included:

- Resourcing
- The implementation of NPF4 policy outcomes – including on climate, biodiversity and 20-minute neighbourhoods
- The interpretation of NPF4 policies – including Policy 5 and Policy 22
- The capacity of statutory consultees
- The housing emergency
- Community skills and capacity to develop Local Place Plans

This letter made requests for continued updates but fell short of outlining detailed findings from the evidence sessions or making specific recommendations as to how the issues identified could be addressed. We have been unable to locate any further documentation that came out of last year's review. As such, despite the extent of activity that has occurred since last year's review, it is difficult to determine which of those actions have arisen as a direct consequence of last year's review of NPF4.

In addition to the above, without such documentation about the outcomes of last year's review, it becomes difficult to understand from what baseline position the Committee is commencing this year's review. Some of our members, particularly those based in local planning authorities, have expressed a concern that the broad nature of the Committee's call for views has resulted in their inability to engage with it at all. This is primarily due to its lack of a clear focus (seeking feedback on a vast range of topics) coupled with the limited capacity of LPA staff.

Whilst we fully support an annual review of NPF4, we believe it is important for this review process to have a clear purpose and to document, not just the evidence gathered from the review, but the Committee's findings drawn from this evidence and associated recommendations. This would then allow for each subsequent review to commence from a solid foundation, enabling future reviews to have a clear focus and to target areas of highest urgency – rather than requesting broad feedback on a vast range of themes without any clear sense of priority.

NPF4 Policy and Guidance

Last year's review of NPF4 raised the issue of uncertainties regarding the interpretation and application of NPF4 policies. Examples included Policy 22 (Flooding), Policy 3 (Biodiversity), Policy 16 (Quality Homes), Policy 5 (Soils), and Policy 11 (Energy).

Much work has been, and is currently being, undertaken to further examine and provide clarification to local planning authorities and other stakeholders on the interpretation and implementation of NPF4 policies. This work has resulted in the publication of an array of documents to support the implementation of NPF4, including:

- **Planning Guidance**
Since the last review of NPF4 we have seen the publication of Scottish Government guidance on:
 - Masterplan Consent Areas
 - Housing Land Audits
 - Effective Community Engagement in Local Development PlanningWe have also seen the publication of planning guidance from other Government bodies and agencies, for example:
 - Updated flood risk guidance from SEPA
- Chief Planner Letters, including the recent letters addressing the housing emergency and the interpretation of Policy 16.
- An array of strategies, plans and toolkits produced by the Scottish Government as well as other Government bodies and agencies, including SNAP3, the Scottish Biodiversity Delivery Plan, and the anticipated Scotland Biodiversity Metric that is currently being prepared by NatureScot.

We acknowledge that planning is not (and should never be) static. There is a need for flexibility and agility in how we interpret and implement NPF4 policies across Scotland having regard to differing and shifting spatial contexts, our continued improved knowledge, our understanding of emerging challenges, as well as the implications of technological advancements. However, NPF4 is itself a static PDF document that does not lend itself well to such a flexible and agile approach. Despite the publication of new and updated guidance, chief planner letters, and other documents aimed at supporting the implementation of NPF4 policies, NPF4 has remained the same since its adoption in February 2023. This static format means that NPF4 itself includes no clear linkages between its policies and the documents that have since been published to support them.

If the implementation of NPF4 is an ongoing, active and adaptive journey, then the format of NPF4 itself needs to reflect this. Rather than sitting as a static PDF document on the Scottish Government's website, we believe NPF4 requires its own digital platform with all relevant supporting guidance, chief planner letters, and other documents prepared to support its implementation, accessible from this platform. This would assist

in ensuring NPF4 is transparent, clear and usable for anyone wanting to understand how to effectively interpret, apply and implement its policies.

Climate and Biodiversity Guidance

In our evidence to the Committee in May of last year, we commented that whilst the majority of NPF4 policies appear to have equal status, the twin crises of climate and nature are given policy priority. Despite this, these crises do not seem to have been given priority in the Scottish Government's work programme. Last year, we noted that we were still awaiting the Climate Mitigation and Adaptation Guidance and a final biodiversity planning guidance (which is still in draft form), as well as a biodiversity metric for Scotland.

Two years on, we are still waiting on these documents. It has been six years since the Scottish Government declared a climate emergency and nature crisis. Both are highlighted as urgent priorities in NPF4. Given this, it seems astounding that we are still waiting on the necessary guidance and tools to address these two critical NPF4 policies in plan and decision making.

We know that work is well underway to publish the long-anticipated Climate Mitigation and Adaptation Guidance, which we expect will come out this year. We are concerned, however, about the long wait for a Scottish biodiversity metric and the implications this is having on the implementation of Policy 3 of NPF4. Although NatureScot is currently progressing this work, we have heard that a final metric for Scotland is still a long way off with a consultation on a draft metric unlikely to occur before the summer of 2026. In the meantime, our members have told us that many applications are being submitted utilising England's Biodiversity Net Gain metric. Without a Scotland metric, and with no guidance as to how the England metric should be applied in Scotland, many of our members are finding that the English 10% uplift is being applied in the Scottish context. The appropriateness of this has been questioned and concerns raised that the longer this continues the more likely it will become an embedded practice whilst we await a Scotland-specific metric.

Addressing the Housing Emergency

For Scotland's plan-led system to help address the housing emergency, a robust and current Development Plan must be in place to ensure we are providing for Scotland's long-term housing needs.

Whilst NPF4 is a significant part of the Development Plan, it is important to remember that it represents only half of the Development Plan for a given area, with the Local Development Plan making up the remaining 50%.

Consequently, the successful implementation of NPF4 policies (including those related to the delivery of quality homes) will also be reliant upon the prompt preparation and adoption of 'new style' local development plans across all of Scotland's local authorities. The current deadline to achieve this, as set by the Scottish Government, is May 2028 – 5 years from the Regulations coming into force.

RTPI Scotland is concerned that, two years on from the adoption of NPF4, very few of Scotland's local authorities have up to date plans in place. In particular, we note that:

- Only five LDPs have been adopted since NPF4's adoption in February 2023, albeit it under the 'old style' LDP system.
- Twenty LDPs are now over five years old
- Eleven LDPs are either beyond or approaching the 10-year mark, having been adopted between 2014 and 2017.

The implications of out-of-date LDPs should not be downplayed. Our members and stakeholders have expressed concerns that much of the housing land allocated in current local development plans (particularly those that are close to or beyond the 10-year mark) has either already been built out or is unlikely to be brought forward due to identified constraints. There are concerns that while we await the adoption of up to date 'new style' LDPs, the housing land supply is inevitably going to dry up. With no exemptions currently in place for the development of windfall sites, and with the removal of the presumption in favour of sustainable development from planning policy, there are limited mechanisms upon which local planning authorities can rely to ensure an adequate pipeline of land supply in the interim period.

Thus far, four local planning authorities have passed through the gate check stage of the LDP process (Falkirk, Midlothian, Moray and East Renfrewshire), with three currently undergoing gate check (Glasgow, Dumfries and Galloway, and East Lothian).

We are aware that local planning authorities across Scotland are working incredibly hard to produce evidence reports to submit to gate check. However, with the DPEA averaging 3 months to approve evidence reports through the gate check process, and with the Plan Preparation stage of the LDP process anticipated to take 3-4 years, it can reasonably be concluded that any local authorities who have not yet submitted their evidence report to the DPEA for gate check are unlikely to have an adopted LDP by the May 2028 deadline.

Our members have also expressed concerns that the timing of the next Scottish Parliamentary Elections in 2026, followed by Scottish Local Government Elections in 2027, could cause delays to the delivery of Local Development Plans, further extending these timelines.

It is vital that the Scottish Government take action to investigate and address the challenges that local planning authorities are facing to prepare their evidence reports and local development plans. We are aware that some local authority development planning teams are very small and are experiencing the challenge of navigating the LDP process with limited staff and resources. We are also aware, however, that the challenges local authorities are facing are multifaceted and cannot necessarily be attributed wholly to resource constraints. RTPI Scotland would therefore welcome a targeted investigation by the Scottish Government to diagnose the issues and introduce proactive interventions to support local planning authorities (this could be through interim policy measures and/or other support mechanisms) to ensure that the planning system can continue to play its part in tackling the housing emergency while local development plans are being developed.

Investing in Planning Outcomes

We note that the Committee has sought views on the "outcome of the Scottish Government's consultation on Investing in Planning". We acknowledge that since this consultation closed there has been a lot of activity around many of the topics addressed in the consultation, including:

- The annual inflationary increase of planning fees
- The introduction of Masterplan Consent Area Regulations and Guidance
- Ongoing work towards the creation of planning hubs for hydrogen and housing
- The trebling of Future Planner bursaries in Scotland and the introduction of a new Scottish Graduate Future Planners Programme to help address the pipeline of planners
- The establishment of a short life working group on Proportionality

However, it is unclear the extent to which the above actions are a direct result of the consultation, since there has been no clear update on the consultation since the summary of responses was published in August 2024. Whilst we can reasonably assume

that a number of actions have been taken forward as a consequence of the consultation, it is difficult to say with absolute certainty the full extent of outcomes that have emerged.

With respect to on the ground impacts, it is too early to say given that the majority of the outcomes listed above are still in their early stages and so their impacts are yet to be determined.

Monitoring and Improvement

In the call for views, the Committee has asked for feedback on “the work of the National Planning Improvement Champion” (NPIC).

We are aware that the NPIC and his team have been making good progress on piloting the National Planning Improvement Framework, for which the first cohort of 10 local planning authorities have produced Performance Assessments and Action Plans (published on the Improvement Service website). The National Planning Improvement Team have also published their first Annual Report on the actions they have taken in the last year to develop and pilot the National Planning Improvement Framework.

The Annual Report also captures the work that is underway by the team to create a National Planning Improvement Hub, with a focus on hydrogen in the first instance. Focusing initially on this rather niche area where there is a clear knowledge and skills gap is, in our view, a good way to establish a framework for how such a hub could be rolled out into other areas of identified planning need. We therefore look forward to seeing future monitoring work around the hub’s rollout and impact.

The work that the NPIC and his team are undertaking is incredibly valuable. RTPI Scotland were strong advocates for the creation of this statutory position, and we are pleased to see that the role largely aligns with what was envisaged in our 2021 Thinkpiece on the subject.

Notwithstanding the above, it is important that this work be accompanied by a careful and thorough monitoring programme. The first Annual Report of the NPIC attempted to address two key topics:

- The activities of the National Planning Improvement Team in their first year, including the processes of establishing the National Planning Improvement Framework and Planning Hub.
- The emerging outcomes from the National Planning Improvement Framework Assessment and Peer Review process.

These are two incredibly meaty topics in and of themselves, and so covering them both within one report has its disadvantages, including that neither topic is able to be given the necessary depth of analysis they deserve.

Moving forwards, we would like to see these two reporting streams separated out in order that the annual report on the activity of the National Planning Improvement Team has a clear purpose and scope, and that a separate and in-depth analysis and assessment of the data coming out from the Assessment and Peer Review process is able to be prepared.

Having the individual Assessment Reports and Action Plans for each local authority publicly available on the Improvement Service website is useful. But what is also required is an in-depth assessment of how this translates across into the national picture of performance and improvement in Scotland, including any points of difference and areas of alignment. It will also be important to understand the relationship between the reports and action plans with the results of the National Customer and Stakeholder Survey (NCSS), which closed late last year having attracted over 600 responses.

We appreciate that the National Planning Improvement Framework is still being piloted, with cohort 3 now underway, and the results of the NCSS are still being analysed. With



only the reports of cohort 1 published so far and the NCSS results pending, it is too early to determine what outcomes will result from this work. We consider that it would be unwise to begin drawing conclusions from the trends emerging from cohort 1 alone. However, looking ahead, there is certainly vital data that is being captured through these processes that has the potential to provide us with vital insights into the current condition of Scotland's planning system. Steps must be taken to ensure that this data (once it is fully captured) is properly interrogated and capitalised upon in order that we have a strong baseline from which the National Planning Improvement Team can continue their important work moving forwards.

Gender Sensitive Planning

We note the Committee's interest in gender sensitive planning. The Royal Town Planning Institute has been engaged in research and thinking on this topic for many years. In 2003, the RTPI published a Gender Mainstreaming Toolkit to provide practical guidance on how to incorporate gender issues into planning at the local level. In 2020 and 2021, the RTPI published in two parts, research on Women in Planning examining both the role and experiences of women in the planning profession (in Part 1) and the impact of the planning system on the day-to-day lives of women (in Part 2), including the extent to which planning policies and practices are capable of producing gender sensitive urban environments.

The Part 2 report found that the UK already has a strong foundation upon which it can continue to strive for equality attainment by incorporating a gender mainstreaming approach. In Scotland, tools such as the Equality Impact Assessments (EQIA) and the Place Standard, and policy initiatives such as local living and 20-minute neighbourhoods are just a few examples of where gender mainstreaming could be embedded and help to deliver gender sensitive planning and design practices. The Part 2 report found that the EQIA process could be an effective tool to shine a light on hidden inequalities and further our progress towards gender sensitive planning. There is evidence to suggest, however, that not all local authorities are taking full advantage of this tool.

Although NPF4 includes the cross-cutting outcome of "A Fair and Inclusive Planning System", we are not aware that there have been any investigations around the extent to which this outcome has been achieved through the plan- and decision-making process thus far.