

LGR Committee – Draft NPF3 & Review of SPP

Robin Holder (Director) has 25 years experience working in the public and private sectors, and is a leading figure in the Scottish planning profession. He is a recognised expert on planning for housing and retail e.g. retail assessments, housing supply and demand, land use strategies, masterplanning, affordable housing and planning obligations/infrastructure requirements. He is an adviser to Homes for Scotland, and has substantial experience in promoting detailed and outline planning applications and securing development plan allocations.

QUESTIONS AND ANSWERS

What key principles should underpin the strategic vision of the Scottish planning system? How will the draft NPF3 deliver on these principles?

What are the strategic connections between the NPF and Scottish Planning Policy. How do they work together to deliver the same priorities?

Simply, planning should be about facilitating development that will contribute to the well-being of Scotland's population in economic and social terms, now and in the future. NPF3 supports sustainable economic growth and that must be the focus.

NPF3, in itself, will only have a limited impact on achieving this because planning decisions are mostly in the control of Councils. The NPF does not contain policies as such and so its influence is quite limited on how Councils choose to have regard to it. Scottish Planning Policy (SPP), which is currently the principal national reference point for development plans and planning decisions, has no statutory force, and is regularly ignored by Councils in respect to key planning decisions on growth.

There should be a closer relationship between NPF and SPP, and I believe they should be a single document.

How does the NPF influence local and regional development plans? How does it influence the development of policy by the Scottish Government and local authorities. How effective is the NPF Action Plan?

The influence of NPF is strong, except where Councils either do not wish to follow its lead or find it difficult to do so. Many of the key aspirations of the NPF appear to exceed the finance available.

The adequate provision of land for private and affordable housing is not achieved by Councils, often for local political reasons and an anti-development culture which still exists in some areas despite planning reform.

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An over-arching point is that despite planning reform, the planning system is still not in my view 'fit for purpose'

- The plan led system is not working because most plans take too long to prepare.
- Decisions on planning applications take too long by far.
- Some major beneficial developments are being prevented or delayed, which should in fact be permitted.

I don't know how effective the NPF Action Plan is.

How does the NPF link to the National Performance Framework and the Christie Commission Agenda

I cannot provide an informed response.

How should Sustainable Economic Growth be defined.

In my view 'sustainable economic growth' is analogous to 'sustainable development', but the former is actually a better phrase.

The difficulties in definition arise from trying to encapsulate the purpose of planning in a single phrase. Planning is often about balancing competing objectives. In my view, planning authorities place too little weight on encouraging growth in the defence of principles of lesser importance.

It is crucial that SPP sets the correct balance, because my experience is that regulatory authorities find it easier to say 'no' than 'yes'.

How will NPF3 and SPP support strategies of regeneration and town centre development.

Both documents place more emphasis on economic growth than previous versions but with limited effectiveness for reasons given above.

Generally speaking, planning authorities are supportive of development in deprived areas and town centres, so the planning system is not the main impediment. The main barrier to private sector investment in regeneration areas is the prospect of no return on that investment. Inevitably, significant public sector pump priming is required and this is in short supply. There is no easy solution.

Many town centres have become degraded because of changing shopping habits – internet and out of town shopping. While this has greatly increase choice and convenience for shoppers, the physical and social fabric of many town centres has deteriorated. Those which have avoided the worst impacts have invested in improving the physical environment and redirected the focus to social activities.

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There is little, in my view, that the planning system in itself can do to support town centre development, other than continue to focus retail and leisure developments there as per the sequential approach.

I am surprised that no mention of housing is made in the LGR's questions on policy priorities. The shortage of private and affordable housing is at crisis levels. Considerably more needs to be done to ensure an adequate supply of housing, as in some key growth areas (e.g. the Edinburgh City Region) there seems to be a reluctance by the planning authorities to do so.

I AM STRONGLY OF THE VIEW THAT NPF3 SHOULD CONTAIN REGIONAL HOUSING TARGETS.

How is top-level planning policy integrated into the economic and social regeneration strategies by planning authorities in Scotland.

This varies greatly between Councils. Some Councils that profess the objective to grow and regenerate, produce plans and make decisions on planning applications that do not accord with this. Quite often, short term political concerns (e.g. NIMBY objections) seem to override and contradict economic and social policies and aspirations. Because planning policies are often expressed in ambiguous terms (i.e. seeking to balance all objectives) these decisions can usually find some kind of justification. Greater emphasis needs to be placed on economic growth.

How will NPF3 and SPP support and influence the community planning process. How do top level planning policies ensure that community planning partnerships deliver spatial planning under single outcome agreements. How do SOAs ensure connection between land use planning and community planning.

Although I am involved in community consultation on a very regular basis on behalf of developers, I rarely if ever encounter 'community planning' as referred to above. I may simply be ignorant of what Councils are doing in respect of community planning, but I do not get the impression of a successful connection between land use planning and community planning.

How are the outcomes of the NPF to be measured? How does the SPP relate to local government benchmarking and best value.

The draft NPF does not contain many clearly measurable targets so this will be difficult. I do not know if the SPP relates to LG benchmarking and best value, but I suspect not in a measurable way.

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How does the Scottish Government incentivise planning authorities to achieve the delivery of the outcomes from the NPF and SPP.

At present there are few, if any, sticks or carrots. A fundamental problem for decades and at present is the delay in preparing development plans and making decisions on planning applications. Reform to the planning system, premised on 'culture change' has not markedly improved matters. Unlike the private sector, Councils are not rewarded for success and punished for failure. There will not be radical improvements in performance until tangible incentives are introduced.

Increases in planning fees will make no difference unless they are dependent on improved performance.

How effective has the consultation process been on NPF3

Good, so far as I'm concerned.

Should there be an agreed cycle of SPP, linked to NPF, and should SPP be subject to parliamentary consideration.

Definitely yes to all. NPF and SPP are inextricably linked and should be presented to parliament as a single document.

Is the 60 day time frame for parliamentary consideration enough?

I don't know.

Is the number of planning officers employed by planning authorities enough?

Not in my experience.

Is the planning fee regime sufficient to support the planning system?

I am not aware that there exists an accurate cost for the system which, if so, is very surprising, and means the question can't be answered without establishing this.

Are there enough planning graduates?

I do not know.