

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework



**RTPI Scotland**

mediation of space · making of place

**Royal Town Planning Institute Scotland**

18 Atholl Crescent  
Edinburgh EH3 8HQ

Tel: 0131 229 9628

Fax: 0131 229 9332

Email: [scotland@rtpi.org.uk](mailto:scotland@rtpi.org.uk)

Website: [www.rtpi.org.uk/scotland](http://www.rtpi.org.uk/scotland)

Patron HRH The Prince of Wales KG PC GCP

Local Government and Regeneration Committee  
Scottish Parliament  
Victoria Quay  
Edinburgh  
EH99 1SP

**E-mail to:** [igr.committee@scottish.parliament.uk](mailto:igr.committee@scottish.parliament.uk)

24 January 2014

Dear Sir/ Madam

**EVIDENCE ON NATIONAL PLANNING FRAMEWORK 3 (NPF3) AND SCOTTISH PLANNING POLICY (SPP)**

Thank you for the invitation to provide written and oral evidence to the Local Government and Regeneration Committee as part of the Scottish Parliament's scrutiny of NPF3 and SPP.

Our oral evidence will be presented on 5 February by Stephen Tucker who is Convenor of RTPI Scotland. Our written evidence is set out below.

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.

Planning is about creating great places for people. It does this through providing vision on how best to shape our communities over the short, medium and long term. Scottish Government is currently reforming the planning system and a key part of this is the move towards a plan-led system where development plans provide the direction on the future of places. RTPI Scotland commends the Scottish Government's recognition of the important role that planning, planners and the planning system can play in helping to achieve its objectives and we welcome the demonstration of this commitment through NPF3 and SPP.

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

In our response to both draft NPF3 and SPP in July 2013, RTPI Scotland set out 10 principles that we believe should be applied to the documents, underpinning the strategic vision of the Scottish planning system. These are that they:

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

1. are ambitious
2. prioritise
3. integrate
4. are influential
5. are clear and holistic
6. focus on delivery
7. are based around outcomes
8. are directly linked to one another
9. provide clarity on where it links with other policy, guidance, advice and good practice
10. are based on sound evidence and needs to be monitored to ensure it continues to be fit for purpose.

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

We welcome the clearer focus on outcomes within the proposed NPF3, and consider that Scottish Government needs to look to use both NPF3 and SPP, 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 focussed 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, allowing for the documents to be explicitly linked to one another.

## Local Government and Regeneration Committee Scrutiny of the Draft Third National Planning Framework

- 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.

***How does the National Planning Framework 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 in translating top-level strategy into the planning system?***

Both NPF3 and SPP must be genuinely influential and support the Scottish Government's aims of planning reform and culture change as the top of the planning policy hierarchy, leading and guiding the preparation of Strategic and Local Development Plans, and the planning decision making process.

NPF3, SPP and development plans need to be able to influence decisions on investment and resources to ensure that we make best use of existing built environment and infrastructure and any new development and/or infrastructure. The proposed policy presumption within SPP in favour of development that contributes towards sustainable development is a key way in which appropriate development will be delivered on the ground.

In addition, to ensure that the development plans implement the ambitions of NPF3 and SPP, there is a need to ensure that planning authorities and planners have the resources, skills, knowledge and culture required. This requires investing in the planning service and continuing to support culture change and performance improvement. There is also a need to reinforce the role of planners to help deliver development that is sustainable and to learn from good practice in this.

***How does the National Planning Framework link to the National Performance Framework /Scotland Performs? How does the Framework and Scottish Planning Policy support preventative spending and the Christie Commission agenda for the reform of public services in Scotland?***

NPF3 should link in with the National Performance Framework National Outcome relating to sustainable places "We live in well-designed sustainable places where we are able to access the amenities and services we need". Outcomes and measurable indicators set for NPF3 and SPP should also relate to this National Outcome, which is key to encouraging politicians and policy makers to take a more spatial position.

NPF3, SPP and the planning system in general must work better on an outcomes focussed basis. Planning authorities should engage with Community Planning Partnerships (CPP), and link outcomes, processes and procedures of land use planning and CPPs, to ensure that CPPs and Single Outcome Agreements have a more spatial focus. Planning should play a stronger role within CPPs. It is worth noting that the current structure Regional Transport Partnerships are legally part of Partnerships, but Strategic Development Planning Authorities are not, even though this could help to link land use planning and CPPs.

RTPI Scotland considers that good planning is preventative spend, and with planning reform moving to a more plan-led approach, we have the opportunity to plan effectively now, avoiding the need to mitigate later.

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

***[...] Therefore, how does the Scottish Government define sustainable economic growth in terms of the NPF3 and SPP? How do sustainable economic growth and sustainable development relate to each other in terms of planning policy?***

RTPI Scotland recognises that Sustainable Economic Growth is the central purpose of the Scottish Government, and we support the concept of Sustainable Economic Growth as a key policy within SPP.

Planning isn't about saying no; it is about implementing a positive vision of a sustainable future. Planners and the planning system have important roles in supporting economic growth, in protecting the environment and in helping communities to thrive. A properly resourced planning system, working within the right framework, is key to achieving ambitions on delivering these. It is an important lever to support approaches to sustainable development, including protecting Scotland's environment.

NPF3, SPP and development plans need to be able to influence decisions on investment and resources to ensure that we make best use of existing built environment and infrastructure and any new development and/or infrastructure. The proposed introduction of a "presumption in favour of development that contributes to sustainable development" as part of SPP needs to provide the clarity required to have influence and impact at strategic and local development planning level, and provide the necessary certainty and confidence desired from the plan-led system.

We suggest that Sustainable Economic Growth is a consequence of Sustainable Development, with Sustainable Economic Growth as a key component of Sustainable Development. We feel that a clearer definition of Sustainable Economic Growth needs to be provided. The definitions of each must provide clarity, but maintain flexibility to be used across planning policy and development management functions. We would urge Scottish Government to refer to the Bruntland definition of Sustainable Development, and the [shared UK principles](#) for Sustainable Development.

***How will the draft NPF3, and review of SPP support and influence the development of the Scottish Government's strategies on regeneration and town centre development?***

RTPI Scotland supports the "town centre first" presumption within the National Review of Town Centres, which is also carried through to the draft SPP. Critical to the success of the "town centre first" presumption will be commitment from planning authorities, Community Planning Partnerships and local authorities to implement and enforce the policy. This presumption must also be worked on proactively at the strategic and local development planning level to ensure that robust policy is in place which will influence the delivery of development within our town centres.

For the National Town Centre Review's recommendations to be successful, it must influence other policy making, and be implemented. This will rely upon:

- identifying new resources and/ or reconfiguring existing resources and assets to support delivery;
- implementing new ways of working which take a more proactive and collaborative approach to planning, a recognition of its important role and longer term approaches to making best use of assets; and
- influencing the key players – including Community Planning Partnerships, local authorities, asset managers, developers and investors – to take account of the 'town centres first' approach.

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

See answer below

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

***How will the draft NPF3, and review of SPP support and influence the community planning process? How do these top-level planning policies ensure that community planning partnerships deliver spatial planning under single outcome agreements? In other words, how do SOAs ensure the effective connection between land use planning and community planning?***

NPF3 and SPP should be genuinely influential, and support the Scottish Government's aims of planning reform and culture change as the top of the planning policy hierarchy, in leading and guiding the preparation of Strategic and Local Development Plans, and the planning decision making process. The NPF3 should therefore be seen as the key document setting out the "where", with the SPP establishing the "how" and "why", framing all planning policy and decision making.

There is work to be done to better embed spatial thinking in policy making, and to integrate 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?***

RTPI Scotland is in favour of national indicators to measure and monitor performance and delivery of outcomes, which are linked to Strategic and Local Development Plan indicators and outcomes.

As set out in Question 1 of this response, RTPI Scotland has produced 10 principles that we believe should be applied to the documents, underpinning the strategic vision of the Scottish planning system. These outcomes could be a starting point for measuring the successes of NPF3 and SPP, with national indicators sitting underneath these. It will be important for these outcomes and indicators to be clearly linked and monitored effectively to avoid unnecessary overlap and duplication in monitoring.

***How does the Scottish Government incentivise planning authorities to achieve the delivery of the outcomes from the NPF and SPP (e.g. through variations in the planning fee system etc.)?***

We are conscious that implementation and delivery are key to the success of both NPF3 and SPP. As an example of incentivising, RTPI Scotland published a paper on Planning and Enterprise Areas in 2011 which is very relevant to delivering development, and set out seven ways in which the planning system can help to promote enterprise, development and growth in specific areas. These are:

- invest in upfront master planning and development frameworks setting out codes and regimes which establish what can and cannot be built in terms of design, layout and phasing
- link the certainty provided through the master plan and design codes with a fast tracked approach to processing planning applications
- link planning of the EAs to resources and innovative financing approaches and incentives
- build on Scottish Government's approach to brokering solutions to planning and development issues and put in place procedures and advice to support high quality and speedy development in EAs
- use planning to link opportunity and need by ensuring that the benefits from EAs are connected to communities outside of their boundaries
- use strategic and local development plans to identify specific areas for EAs and the links that need to be made to them
- in the medium to longer term identify the broad locations of any new EAs in the National Planning Framework so as to link them into future national development priorities

There is a key issue with resourcing. For the culture change envisaged as part of planning reform to be achieved, adequate resourcing is required to achieve a planning service which is solutions focussed, positive, proactive and with a focus on development delivery, and to effectively run the service as well as continuing to improve it.

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

***How effective has the Government's consultation process been on the development of the draft NPF3?***

RTPI Scotland attended a number of consultation events on both the draft NPF3 and SPP during the consultation period. The range and number of events marks an improvement on previous engagement on NPF2, and we are aware of a range of events for stakeholders, planning authorities and developers, as well as community groups and the general public who might not normally have involvement with NPF3 or planning itself.

Perhaps a longer lead-in time to the publication of the draft NPF3 and SPP and the consultation process would be beneficial in the future, with monitoring and reporting on progress of both documents' preparation process and the evolution of the framework and policy. This would bring all interested parties into a more regular form of engagement with the process.

***Should there be an agreed cycle for review of the SPP (statutory or otherwise)? Should this be linked to the cycle for review of the NPF? Should the SPP be subject to a similar level of parliamentary consideration as the NPF?***

NPF3 and SPP need 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.

We suggest that SPP would benefit from an Action Plan, as is the case with NPF3, and that these could be one and the same thing, in the form of a Joint Action Programme. We also suggest that SPP should be subject to a process of monitoring by way of an Annual Report, providing a more current idea of trends to enable Scottish Government to assess what amendments should be made to SPP. There is also an opportunity to better define the indicators that are required to monitor NPF3 and SPP, and link these with emerging indicators at the Strategic Planning level.

There could be an opportunity to more closely link the timescales and outcomes of both NPF3 and SPP by joining them together as a "Development Plan for Scotland".

***Is the 60-day statutory timeframe for parliamentary consideration of the draft NPF sufficient to allow for proper scrutiny?***

RTPI Scotland recognises that thorough scrutiny of NPF3 (also taking into consideration SPP) within 60 days is not an easy task. It also gives us a situation where the scrutiny becomes something like a 'one-off' set piece. We suggest that an ongoing dialogue and reporting culture could be established to avoid the focus of a discussion only really taking place every five years.

As part of the RTPI Scotland Manifesto for the last General Election in 2011, "Shaping the Future of Scotland" we suggested establishing a Planning Committee in the Scottish Parliament to ensure political oversight and engagement in national planning issues. This would help to create an on-going dialogue.

***During its recent scrutiny of the Scottish Government's 2014/2015 draft budget the Committee received evidence of a reduction in local government staffing level of over 30,000 in the last five years. As part of this evidence the Committee received anecdotal evidence of a major reduction in the level of resources for the planning system in the financial year 2012/13. [Budget submission from the RTPI]. In light of this evidence, is the current number of planning officers employed by planning authorities across Scotland adequate?***

This is very difficult to determine as there are currently no figures published for this. We would repeat our anecdotal evidence as quoted within the question.

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

***In the wake of the recent review, is the current planning fee regime in Scotland sufficient to support the planning system? How does reform of the planning system feature within the Scottish Government's/COSLA's plans for delivery of the Christie Commission principles?***

RTPI Scotland is of the view that there is a wider need, in the medium to longer term, for local authorities, COSLA and Scottish Government to agree a consistent and coherent methodology which best assesses the costs of providing the planning service. This would provide a sounder basis for assessing whether costs were being fully recovered for development management in future.

The basis of the recently introduced fee structure is to ensure, as best as possible full cost recovery for development management services and to ensure that we have consistently high quality planning services across Scotland. Given this, RTPI Scotland is of the view that it is essential that income from planning fees should be ring-fenced, used only to fund the planning service or functions supporting it. It would be perverse if the uplift in fees was not passed onto the planning service, since this could hinder the goal of performance improvement in planning authorities. This should be looked at in the context of the current reduction in planners in post in local authorities. The most recent figures available on staffing levels in planning departments are from the Scottish Government Planning Workforce Survey 2010 and show that the number of Full Time Equivalent planning staff in local planning fell by over 10% between 2006 and 2010 (from around 1700 to 1575). It is likely that staff levels have decreased further, and probably faster, since then.

***Is the current supply of graduate planners into the Scottish planning system adequate? How many third-level educational institutions currently offer accredited courses in Scotland in terms of urban planning and associated studies?***

There are currently four universities in Scotland with courses accredited by the RTPI – Heriot Watt University, University of Dundee, University of Glasgow and University of Strathclyde. There are a total of two different undergraduate full time courses and nine different postgraduate courses which can be studied part time or full time. A list of these institutions and accredited courses is below and further information on accredited qualifications can be found on the RTPI website:

<http://www.rtpi.org.uk/education-and-careers/information-for-universities/accredited-qualifications/>

The numbers of graduates from accredited planning courses in Scotland over the last few years are:

- 2009/10 – 151 graduates
- 2010/11 – 130 graduates
- 2011/12 – 110 graduates

These graduates may not all take up planning positions in Scotland.

This shows that the numbers of planning graduates are decreasing. However anecdotally we have seen a fall-off in the number of local authority planning posts in the last couple of years, and we anticipate that this will continue at least for a further two years. The drop in planning posts in the private sector at the beginning of the recession seems to have slowed, with recent signs of new recruitment starting to happen.

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](mailto:craig.mclaren@rtpi.org.uk).

Yours sincerely

Local Government and Regeneration Committee  
Scrutiny of the Draft Third National Planning Framework

**Craig McLaren**

Director of Scotland and Ireland