



Fiona Simpson
Chief Planner
Planning and Architecture Division
Scottish Government
Victoria Quay

29 March 2022,

Dear Fiona,

Key Agencies Group response to consultation draft NPF4

The Key Agencies welcome the consultation on the draft National Planning Framework 4 and the recognition of the need for radical change in the way we plan our places for tomorrow if we are to successfully address significant challenges such as the climate emergency and nature crisis. The Key Agencies recognise our important role in collaborating with others to find solutions to these challenges to ensure we can deliver the aspirations of draft Universal Policies 2 and 3.

The overall ambition of the draft is strongly welcomed and necessary, although we feel that greater clarity and strengthening of wording is needed if this ambition is to be achieved. There are strong interconnections across the national spatial strategy, national developments and policy handbook and it would be helpful if the framework could be presented in way that clearly articulates the interconnectivity and what this means for planning processes. The use of schematics that illustrate how the different elements of the Framework come together at different scales through a place-lens would be helpful. This would also help strengthen more collegiate approaches to development in line with the Place Principle. The Key Agencies feel that a stronger framing of the Place Principle generally throughout the document is needed.

The scale and pace required to successfully address the big challenges has implications for the resourcing and upskilling of planning professionals and other stakeholders. The Key Agencies believe that a range of measures will be needed to help in this area including training, further tools and guidance and, importantly, through a wider culture change in how we work in line with the Place Principle. New ways of working such as a shared services and the opportunities through the digital planning can also provide solutions and the Key Agencies are keen to work with the Scottish Government and other stakeholders to explore these further.

The Key Agencies will have an important role in supporting the delivery of national developments and would emphasise the opportunity to take a whole system place-based approach to their delivery to ensure wider place benefits for local communities. This should include consideration of how the six spatial principles can be best reflected in their design and delivery. Community engagement must be a key element of this. Early and ongoing collaboration with Key Agencies will help remove risks and identify opportunities for innovation in their delivery.

We strongly welcome the inclusion of the policy handbook and the removal of the need for repeated policies in each local development plan. Greater clarity on the weight of the universal policies in relation to other policy areas would also be welcomed as this would help understand priorities in planning decisions where there may be potential conflicts between policy areas. Further guidance on how planning authorities should balance potentially competing policy areas is needed to avoid potentially costly and resource intensive challenges that can cause delays in delivering development.

The universal policies are strongly supported although we consider that the wording needs to be tightened (including 'musts' rather than 'shoulds' - providing greater certainty to developers as well) and there needs to be greater recognition of the role of local development plans in supporting more systemic approach change in response to the climate emergency. There should be a fundamental policy requirement that the spatial strategy of a local development plan delivers net zero greenhouse gas emissions and achieves overall betterment on the resilience of the area to future climate change.

An effective infrastructure first approach will be critical to achieving this too. We believe that an infrastructure first approach should be a universal policy and provide much greater clarity than the current draft policy. To help with this a definition of an infrastructure first approach and the types of infrastructure this covers is essential. The definition provided in the [Infrastructure Investment Plan](#) provides a useful basis for this. The Key Agencies believe that multi-functional blue-green infrastructure must be identified as essential infrastructure to deliver across a wide range of areas including the nature crises, sustainable drainage, alleviating flood risk and 20-minute neighbourhoods. This is a good example of where more explicit interlinkages across policy areas should be made.

Scotland's landscapes are at the heart of our nation, rich in nature and history, and central to our identity. They are a critical asset that enrich our lives, improve our health and wellbeing, and support our future prosperity. The lack of a policy to protect and enhance Scotland's landscapes is seen as a significant omission. To deliver the outcomes of NPF4, we need to plan and manage all our landscapes positively in ways which maximise these multiple benefits and tackle the climate change emergency and biodiversity crisis we face. NPF4 needs to support the implementation of priorities for positive landscape change as identified through strategies and plans at the regional, local and place level, determined locally through collaborative working and engagement with communities and stakeholders.

We would also highlight the need for the final draft of the Framework to support delivery of key strategic plans and research findings that have been published recently including Scotland's National Strategy for Economic Transformation and the recent findings of the [UKCCC's report](#) on Scotland's progress to take action in adapting to critical climate impacts.

We note that you intend to work with key partners, including Key Agencies, to work up a detailed delivery programme to accompany the final NPF4. The Key Agencies will have a key enabling role to play in ensuring the successful delivery of many aspects of the Framework and we are keen to work with you on this. The pace and scale of change needed will require a culture change in how planning stakeholders work together under strong place leadership.

There is some urgency to understand how planning authorities can be best supported in embracing new policy areas and the Key Agencies are keen to contribute to this agenda. Given the significant progress that must be made by 2030, and the importance of a plan-led planning system, it will be vital that Scotland has a full suite of NPF4-compliant Local Development Plans as soon as possible. We are keen to work with partners to explore a wide range of actions including new ways of working as 'team Scotland', maximising the opportunities presented through the digital planning programme, capacity building and supporting tools and guidance.

We would be pleased to clarify and discuss any of the points raised above and are keen to collaborate with you in the preparation of the final Framework and supporting delivery programme.

Yours sincerely,

Katherine Lakeman (Chair – Key Agencies Group)

On behalf of:

- Architecture and Design Scotland
- Historic Environment Scotland
- NatureScot
- Scottish Enterprise
- Scottish Environment Protection Agency
- Sports Scotland