RESPONSE TO THE SCOTTISH GOVERNMENT CONSULTATION ON THE DRAFT FOURTH NATIONAL PLANNING FRAMEWORK (NPF4).

Summary

The pre-eminent contexts of NPF4 are the climate and biodiversity crises and the need for planned and positive de-growth. These unprecedented challenges require not only a vision but a policy-directed approach to future investment in infrastructure and existing assets, with aligned and effective delivery structures focussed on low carbon and circular economy investment and decision making.

RSE acknowledges that Scottish Government intends to consult to develop a delivery programme to accompany NPF4 but that the scale of transformational change linked to NPF4 is unprecedented, and to launch a planning framework without having thoroughly validated its deliverability and affordability carries the inherent risk of the planning framework being unrealistic from the outset. RSE, therefore, urges that this is used as an opportunity to review existing delivery blockages and failures in policy and investment and determine how collectively and effectively the public and private sector can work to achieve a fairer, green future at all scales.

The present planning system sits at the heart of this process and needs to be resourced and empowered to facilitate the essential step changes required in the present approach to development and investment if Scotland is to achieve net zero.

Whilst the aspirational targets, objectives, and visions set out in the draft fourth National Planning Framework (NPF4) are laudable, the RSE has concerns over the deliverability and affordability of the solutions required to, for example, achieve Scotland's target of achieving net zero emissions by 2045.

NPF4 presents a range of desirable, nationally significant developments, but not a concrete delivery plan. A detailed delivery plan (including the identification of major 'place' delivery vehicles and partnerships, an indicative capital investment programme, and audits of any additional local resources and skills required to deliver spatial investment plans) should be developed to provide a clear framework for stakeholders to engage with, underpinned by meaningful multi-level support. The Irish Government's National Planning Framework, which is supported by a 10-year Capital Investment Plan and assigns responsibility for its delivery at a Ministerial level, represents a model the Scottish Government could adopt.

NPF4's spatial diagrams should be revised to overcome a lack of alignment with traditional administrative boundaries and move away from reductive interpretations of place, to appreciate its complex, multifaceted nature and to facilitate the development of place-specific developments tailored to local geographies and socio-economic conditions.

NPF4's spatial principles should be revised to unpack any synergies between principles, and their connections to other sections of the framework.

A stakeholder mapping exercise should be undertaken to provide clarity over responsibilities for the delivery of NPF4's goals.

There is a lack of coherent interaction between NPF4 goals. A holistic plan should be developed which enables interdisciplinary and interdepartmental collaboration to articulate and account for the trade-offs of striving to achieve multiple objectives. Indeed, the joint consideration of objectives would be best improved by developing coherent policy narratives and missions. Available evidence should then be used to monitor progress made against agreed and explicit objectives, and subsequently inform decision-making.

NPF4 should adopt a proactive and future-focused development approach which accounts for the urgency of the climate and biodiversity crises, the potential of Artificial Intelligence and big data solutions, and wider societal needs such as the wellbeing economy and shifting work patterns.

 NPF4 should be grounded in the needs of individual communities as well as the nation more generally. As such, inclusive mechanisms that incorporate all relevant stakeholders in the design and delivery of projects, from briefing stage through to securing community ownership, are required to re-shape NPF4's development process, which is often misaligned with strategic planning aims and not supported at local level.

 The RSE would welcome the opportunity to further engage with the development and implementation of NPF4.

Summary

Introduction

1 The Royal Society of Edinburgh (RSE), Scotland's National Academy, welcomes the opportunity to provide its views on the Scottish Government's consultation on the draft fourth National Planning Framework (NPF4). Our response was facilitated through an RSE working group which included RSE Fellows and members of the Young Academy of Scotland with significant practitioner and research experience across academia and the planning, economic, health, heritage, development, engineering, and third sectors. Two subsequent roundtable discussions were also held to explore pertinent themes of the draft NPF4 in more detail: (1) Delivering NPF4 and (2) Big Picture Thinking and NPF4's Spatial Principles, which also included representatives from key external stakeholders. The points raised in these roundtable discussions have also informed this response. In doing so, our response also builds on ideas raised in previous RSE policy advice papers, including:

- Response to the Scottish Government's Tax Policy and the Budget consultation.[1]

- Response to the UK Parliament Environmental Audit Committee's Inquiry on 'aligning the UK's economic goals with environmental sustainability'.[2]

2 Rather than present responses to each of the questions listed in the consultation, this response reflects on several key themes, as outlined below.

Coherence

3 The RSE contends that the draft NPF4's policies will not provide the step-change required to meet the Scottish Government's net zero ambitions. The scale of this transition goes beyond the policies outlined in the previous NPFs and merits further emphasis.[3] While this objective was highlighted as the key overarching priority in the position statement released in November 2021, this is not clearly outlined in the draft strategy.[4]

4 To this end, **NPF4 should be re-drafted to move away from articulations of policy ambitions as targets that 'should' or 'could' be achieved to re-position them as objectives that 'must' be achieved to more effectively convey the urgency of change that is required.** For example, part 3 of draft NPF4 (the *National Planning Policy Handbook*) states that the climate emergency should be given 'significant weight', and that the biodiversity emergency is of 'fundamental importance' for planners. However, there is a lack of recognition of these crises as the most fundamental issues facing society, or the relative positive and negative outcomes of striving to achieve this objective in relation to other NPF4 goals, for example, in relation to the tensions between built heritage and retrofitting buildings.[5]

Geography

5 The RSE contends that the draft NPF4 builds on unfamiliar delimitations of space (as illustrated by the *Action areas for Scotland* spatial diagram) and that the **spatial frames underpinning these delimitations merit further explanation**. Indeed, the regions proposed in the document do not map onto existing policy geographies, such as the Regional Partnerships, that are well recognized by both geographers and planners. As such, it echoes a long line of policy work founded on mis-guided geographic principles.[6] It strikes the reader, for instance, that the explanation for the underlying geography of sub-national groupings of projects is missing. Moreover, the proposed regions are treated in a reductive manner, differentiated by one verb each (innovate, revitalise, transition, transform, and sustain), which risks oversimplifying interpretations of place through the imposition of a two-dimensional interpretation of economic geography.

1   Royal Society of Edinburgh (2021) *RSE Response to the Scottish Government's Tax Policy and the Budget Consultation*. [online] Available at: https://rse.org.uk/expert-advice/advice-paper/tax-policy-and-the-budget/.

2   Royal Society of Edinburgh (2022) *RSE Response to UK Parliament Environmental Audit Committee Inquiry into Aligning the UK's economic goals with environmental sustainability*. [online] Available at: https://rse.org.uk/expert-advice/advice-paper/rse-response-to-uk-parliament-environmental-audit-committee-inquiry-into-aligning-the-uks-economic-goals-with-environmental-sustainability/.

3   This could, for example, account for Bank of England's move to attach a higher capital requirement for lending to carbon intensive businesses as a means of encouraging investment in low carbon initiatives. For further information see Bank of England Prudential Regulation Authority (2021) *Climate-related financial risk management and the role of capital requirements*. [online] Available at: https://www.bankofengland.co.uk/-/media/boe/files/prudential-regulation/publication/2021/october/climate-change-adaptation-report-2021.pdf?la=en&hash=FF4A0C618471462E10BC704D4AA58727EC8F8720.

4   Scottish Government (2021) *Fourth National Planning Framework: position statement* [online] Available at: https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/pages/4/

5   For more information on this see: Sesana, E., Bertolin, C., Gagnon, and Hughes, J. J. (2019) Mitigating Climate Change in the Cultural Built Heritage Sector, *Climate*, 7(90): 1-23.

6   For further information on this, see Maclennan, D. (2021) *A Scotland of Better Places* [online] Available at: https://policyscotland.gla.ac.uk/a-scotland-of-better-places-report/.

6 Moreover, **the economic principles outlined in draft NPF4 should be revised to account for the inevitability of uneven future spatial development, and as such need to build in what regional imbalances and trade-offs would be tolerated**. These criteria should support a bottom-up planning process informed by local socio-economic conditions and priorities; as opposed to the imposition of top-down directives that inhibit innovation and creativity and disregard local context.[7]

7 **Indeed, the spatial diagrams employed throughout NPF4 seem reductionist and require revision to account for the inherent complexities of how spatial economic processes operate across Scotland and the UK more generally**. At a national level, NPF4 discusses broad regions that do not align with many of the existing structures of government and governance. Realignment could be achieved by bringing together the administrative structures of arm's length bodies (quangos) and local authorities/councils to form the basis of regions they operate in, as opposed to the 7 regions approach currently adopted within draft NPF4. Re-visiting these spatial diagrams will be crucial to ensuring the successful delivery of NPF4, by fostering an understanding of the delivery structures that operate within Scotland, and the relational linkages that exist between places and people.

8 **In response, a coherent understanding of how regional, local authority, and arm's length bodies (quangos) boundaries can be re-aligned is required to articulate the geographic principles underpinning NPF4 more clearly, and in turn inform its governance structures and delivery.** This should account for the fact that any funds to implement policies will be funneled through local authorities and their boundaries are at odds with the spatial diagrams outlined in the draft.

9 Crucially, this approach should not be limited to city-regions and travel to work areas. Instead, complex spatial definitions should be incorporated within NPF4 to account for neighborhoods, local communities, and their multifarious drivers. Ultimately, NPF4 should employ a multi-scalar, holistic approach which allows people on the ground to identify problems (and clearly define their spatial reach).

Planning System

10 The RSE recommends that **NPF4 is revised to unpack the ramifications of any proposed changes to the planning system in more detail, and to more clearly articulate its overall purpose** (e.g., whether it is intended to serve as a passive document that facilitates change or whether it is intended to proactively drive change by instilling a set of clearly defined rules and objectives). Indeed, there is a lack of clarity around how NPF4 will enable planners to facilitate and implement a step change and make strategic decisions within the current planning system. To this end, further detail on the implementation of policies on the ground, via *Local Development Plans*, should also be included to account for any funding, capacity and skills shortages across the planning system and local authorities more generally.

11 There is an opportunity for NPF4 to catalyse a step-change in the planning system by enabling a shift away from a reactive and regulatory approach towards a missions-led approach led by clearly defined spatial missions which bridge the gap between big picture thinking and delivery through imaginative solutions.[8] Notwithstanding, robust mechanisms are required to ensure planning and development decisions are made in line with energy, carbon, and circular economy goals.

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[7] The absence of strong metropolitan regional and rural regional plans threatens Scotland's ability to balance both local and national autonomies. Indeed, the progressive centralisation of strategic spatial planning to the 'Scottish Government level' misaligns with an emphasis on local and community levels, as encapsulated within conventional planning principles and community wealth strategies.

[8] Indeed, this mission-led approach, as coined by Mariana Mazzucato (see Mazzucato, M. (2021) *Mission economy: A moonshot guide to changing capitalism*. Penguin UK.), has been effectively operationalised within the UK Government's Levelling Up White Paper (https://www.gov.uk/government/publications/levelling-up-the-united-kingdom), and could be adopted within NPF4.

12 The RSE contends that NPF4 should also function as a National Spatial Strategy to enable the improvement of people's lives and places more generally through carefully curated planning legislation. This, however, is unlikely to be achieved within the current iteration of NPF4, which represents a place agnostic, fixed physical plan. **In response, NPF4 should be revised to enable planners, in collaboration with local communities, to shape places through the implementation of place-specific principles tailored to local geographies and socio-economic conditions.[9]**

Place & spatial principles

13 Draft NPF4 puts forward six spatial principles, four of which are regularly used in policy making (*compact growth, local living, conserving and recycling assets, and just transition*) and as such, are generally agreeable. However, **these principles should be expanded upon to underscore any synergies between principles and connections to other sections of NPF4 more generally**. For example, careful consideration should be given to both urban and rural settings – the latter can pose challenges for the implementation of some of these ambitions (e.g., *local living*). Meanwhile, the *balanced development* and *urban and rural synergy* principles are not clearly defined and require revision to enhance their applicability. Indeed, while there is some reference to *balanced development* in European policymaking circles, the practical implications of this in a Scottish context are not clear. Similarly, concepts such as decline and degrowth, and acknowledging the need to reduce overall rates of production and consumption within the context of the climate and biodiversity crises, are significant oversights within the draft NPF4, and command recognition within the final framing of NPF4's spatial principles.[10]

14 The RSE contends that 'place', as a multifaceted principle, merits greater emphasis throughout NPF4. **Indeed, the current draft articulates place in a reductive manner, positioned predominantly as a set of geographic coordinates. In response, there is an opportunity to incorporate innovative thinking from different policy areas in relation to place at a national and city level.[11]** Inspiration can also come from international agencies.[12] In doing so, a joined-up approach should be embraced that recognizes place as a palimpsest.[13] Lived experiences, the emotional realities of place, and the multiple connections between people and place, including through shaping policy at local level, should also be considered. Indeed, connections between people and places are key to enabling an approach to place-making that is in the public interest and where community ownership is a condition of many changes to the built environment. To this end, local place plans can go a long way towards supporting national ambitions, and should be promoted and supported, but the RSE notes that these are not statutory, and as such, there is a lack of clarity on how the NPF4 will cascade down to local level.

15 **By adopting a more complex understanding of place, and the interconnections and overlaps between different places, NPF4 could recognise Scotland as a living landscape, and as such enable innovation in large scale spatial planning which respects diverse cultures and communities at local level.[14]** This would provide a means of connecting the nature-based solutions outlined in draft NPF4 to the wider regions they are situated in. Indeed, integrating an ecosystem/natural system-based thinking approach within the final NPF4 could enable more holistic decision-making. Indeed, a more ecological perspective may also have merit in terms of spatial economic policy thinking, for example in relation to measures that support ecologies of innovation in rural areas (as well as cities), and that reshape learning networks within places.

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9 In doing so, NPF4 could draw from examples such as the New Gorbals Housing Association development in Glasgow, which seeks to maximise its contribution to the overall regeneration of the Gorbals by addressing the needs of disadvantaged individuals. Indeed, the regeneration project is underpinned by a set of core values which enable local politicians and communities to collectively aspire and work towards shared goals, underpinned by the support of relevant actors including Scottish Homes, Scottish Enterprise, Scottish Development Agency, and Glasgow Development Agency. For more information on this, see: New Gorbals Housing Association (2018) *Business Plan Update* 2018/19. [online] Available here: https://www.newgorbalsha.org.uk/media/297089/business-plan-update-1819.pdf.

10 On degrowth, see for example Sekulova, F., Kallis, G., Rodriguez-Labajoz, B. and Schneider, F. (2013) Degrowth: from theory to practice, *Journal of Cleaner Production*, 38: 1-6.

11 See for instance the recent work that places lived experiences centre-stage for place-making Scottish Government (2021) If not now, when? - Social Renewal Advisory Board report: January 2021 [online] Available at: https://www.gov.scot/publications/not-now-social-renewal-advisory-board-report-january-2021/documents/; at a city level, Glasgow City Council's work through the Place Commission should be noted https://www.surf.scot/glasgow-city-urbanist-announces-new-place-commission/

12 UNECE (2021) Place and Life in the ECE – A Regional Action Plan 2030 [online] Available at: https://unece.org/hlm/documents/2021/08/session-documents/place-and-life-ece-regional-action-plan-2030-tackling

13 For more information on palimpsests, see: Carter, H., Larsen, H. G. and Olesen, K. (2015) A Planning Palimpsest: Neoliberal Planning in a Welfare State Tradition, *European Journal of Spatial Development*, 58: 1-20.

14 For more information on living landscapes see Scottish Wildlife Trust (2022) *Living Landscapes* [online] Available at: https://scottishwildlifetrust.org.uk/our-work/our-projects/living-landscapes/.

16 Similarly, relationships between heritage and place making, and between emotional economic value and urban development also merit greater emphasis within the final strategy.

17 **The RSE calls for NPF4 to account for resource and investment flows within Scotland and across the entirety of the United Kingdom. For example, NPF4 should take account of any investment received as a result of the UK Government's *Levelling Up* agenda.** Indeed, the draft makes no mention of the UK Government's *Levelling Up* White Paper (and vice versa), despite the likely influence of cross-border, intergovernmental investment flows on infrastructure development plans.[15] These impacts should be accounted for through a fully costed delivery plan, which should be developed alongside NPF4 to account for Scotland's socio-economic diversity and rural/urban disparities.[16]

18 **In response, the Scottish Government together with relevant stakeholders (e.g., the Convention of Scottish Local Authorities or COSLA) should co-develop a national plan, that is built upwards from communities and regions, to ensure levelling up funds are used in a coherent and positive way to support fulfilling the ambitions of the NPF4.**

19 The Place Principle, 20 Minute Neighbourhoods and Community Wealth Building receive infrequent, shallow references throughout NPF4. As these are potentially relevant policy ideas (though the 20 minute neighbourhood embodies laudable goals, the RSE are concerned that it overlooks how the geographies of cities and services function) that have a prominent status in the current *Programme for Government*, it is disappointing that these concepts are articulated uncritically and referred to only occasionally, or in name only. Indeed, there is a corresponding lack of content on integration and implementation, and little detail on how the success of the delivery of these ambitions will be measured.

20 The RSE has concerns over the spatial scalability and widespread applicability of 20-minute neighbourhoods outside of city-region settings, particularly given the dominance of private vehicles as the primary mode of transportation in rural regions and limited employment opportunities in economically deprived areas.

Delivery

21 **The RSE suggests that responsibility for the delivery of NPF4 should be assigned at a Ministerial level to re-position NPF4 as a golden thread which unifies otherwise disparate policy initiatives across the breadth of the policy creation process (i.e. from the articulation of visions through to implementation).[18]** This could draw from the example of the Irish Government's NPF, where senior officials (including the Taoiseach) have led on the implementation of *Project Ireland 2040* through development of a clearly articulated 20-year vision within the *National Planning Framework*, and an accompanying *National Development Plan 2021–2030* which aligns investment plans with the National Strategic Objectives for 2040.[19] This assignment of responsibility has influenced other policies, strategies and investment decisions within Ireland through the implementation of an interdisciplinary, holistic approach to working, and provides a model which could be implemented in Scotland.

22 **The RSE contends that for the draft NPF4's aspirational statements to become meaningful, they should be accompanied by a fully costed and detailed delivery plan which provides clarity on delivery timelines.** Indeed, without an accompanying delivery plan it will be difficult to attach credibility to NPF4. Similarly, the level of credibility that can be attributed to NPF4's ambitions depends on what has been achieved as a result of previous Scottish Government NPFs. To this end, an evaluation exercise should be undertaken to assess any progress in relation to objectives outlined within, for example, NPF3, to directly inform the development of NPF4.

15 Whilst the Levelling-up White Paper does omit the role of natural and housing capital in relation to tackling spatial inequalities, it should be praised for its inclusion of conceptual developments on, for example, the roles of diverse forms of capital in spatial change, its articulation of missions, and its provision of a 'golden thread' for senior Ministers to articulate how to tackle spatial inequalities across a broad range of policy commitments.

16 While the recent information provided by Scottish Futures Trust explains that a delivery document will be developed, it is concerning that it is intended to only consist of a brief report that 'will represent a starting point'. This significantly underplays the importance of validating the deliverability and affordability of the transformational changes required to achieve the ambitions of NPF4. See Scottish Futures Trust (2021) *National Planning Framework 4* [online] Available here: https://www.scottishfuturestrust.org.uk/page/national-planning-framework-4-npf4.

17 Scottish Government (2021) *A Fairer, Greener Scotland: Programme for Government* 2021-22 [online] Available here: https://www.gov.scot/publications/fairer-greener-scotland-programme-government-2021-22/.

18 Indeed, stronger red lines are required to provide clarity for delivery partners (which is of paramount importance in the planning sector due to its status as a discretionary system). The NPF4 should be developed to provide a sense of certainty and predictability for those tasked with its delivery.

19 Government of Ireland (2019) *Project Ireland 2040 National Planning Framework*. [online] Available here: https://www.gov.ie/en/publication/774346-project-ireland-2040-national-planning-framework/#; Government of Ireland (2021) *National Development Plan* 2021-2030. [online] Available here: https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/.

23 **A coherent spatial governance structure is required to enhance the deliverability of NPF4.** Within this, two levels of planning merit greater emphasis in the draft NPF4; inter-regional and inter-urban planning. Indeed, delivering NPF4's ambitions at the city/rural region level will be critical to its success (as well as the neighbourhood scale nested within this). This structure, which accords with understandings of how neighbourhood economies and city economies operate, is not acknowledged within the draft NPF4, and merits exploration.

24 **NPF4's deliverability structure at the scale of regional partnerships, through organisations such as Highlands and Islands Enterprise (HIE) and South of Scotland Enterprise (SoSE), also merits greater emphasis.** Indeed, this represents a strategic level that brings together a complex web of socio-economic and environmental considerations and provides a means of enabling a *Just Transition to a net zero economy* (amongst other policy goals). As such, NPF4 should acknowledge the primacy of this regional scale (in relation to individual/municipal scales), and the need to cascade any best-practice examples to the local level to ensure a sense of place is maintained in local town centres and neighbourhoods whilst delivering NPF4 'nationally'.

25 NPF4's national and strategic level targets will require transformational change and widespread societal acceptance to be a success, and **a focused public engagement strategy should be developed to enhance public awareness of NPF4's goals and objectives and ensure societal buy-in.**

26 The development of NPF4 should identify and address funding blockages to its aims, for example any VAT (as determined by the UK Government) associated with retrofitting and re-purposing; brownfield amelioration costs; or the augmented costs associated with small scale infill housing.

27 **The RSE recommends that in their revision, the NPF team should acknowledge the plan's political nature and and call for heightened intergovernmental collaboration to achieve a set of clearly defined and measurable objectives.[20]** As it stands, the framework is disjointed in relation to other relevant policies at both national and UK level.[21] Consequently, further work is needed to ensure coherence with other Scottish Government policies as well as a clear hierarchy of policies determined by clear priorities. These policies include – but are not limited to – economic transformation, health interventions as well as overarching future aspirations for the circular and wellbeing economy and net zero targets.[22] To align these jectives and provide a common language, the United Nations' Sustainable Development Goals, which are already used in the National Performance Framework, could be cross-referenced.[23] The final document should also account for the impact of UK government policies, such as the *Levelling Up White Paper*,[24] including impact of non-devolved activities (e.g. wayleaves for digital connectivity) as well as potentially challenging decisions on issues such as fracking.[25]

28 The RSE contends that there is a lack of clarity on how different sections of the draft NPF interlink, for example how parts 1 (*A National Spatial Strategy for Scotland 2045*) and 2 (*National Developments*) align with part 3 (*National Planning Policy Handbook*). This lack of alignment and coherent structure may form a barrier to delivery, which should be resolved in any re-drafting of NPF4.

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20 In terms of fiscal powers, at an intergovernmental level, the Scottish Government is impacted by Block Grant Adjustments and the privatisation of public wealth. At a national level, a centralised approach to taxation risks overlooking the fiscal imbalance between cities and rural regions. These imbalances must be addressed as a priority.

21 Indeed, there is a lack of recognition of investment in nuclear energy as part of a mixed portfolio of energy production and as a means of transitioning away from oil and gas throughout draft NPF4.

22 On economic transformation, see: Scottish Government (2022), National Strategy for Economic Transformation [online] Available at: https://www.gov.scot/publications/scotlands-national-strategy-economic-transformation/; on the wellbeing economy see the Carnegie Trust's recent work on wellbeing https://www.carnegieuktrust.org.uk/publications/good-work-for-wellbeing-in-the-coronavirus-economy/) and *The Enabling State* (https://www.carnegieuktrust.org.uk/publications/the-enabling-state-a-discussion-paper/); Scottish Government (2020) *Securing a green recovery on a path to net zero: climate change plan* 2018-2032 – update [online] Available at: https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/

23 United Nations (2022) *The 17 Goals* [online] Available at: https://sdgs.un.org/goals. See, for example, https://nationalperformance.gov.scot/sustainable-development-goals. Indeed, the Scottish Government has sought to adopt the SDGs in full, and "localised" them into the National Performance Framework.

24 UK Government (2022), *Levelling Up the United Kingdom* [online] Available at: https://www.gov.uk/government/publications/levelling-up-the-united-kingdom

25 For further information on wayleaves in relation to digital connectivity, see David Hume Institute (2021) *Levelling up broadband connectivity: The Action Project.* [online] Available at: https://static1.squarespace.com/static/59b82ed532601e01a494df34/t/617be2e4a8c25f6bf1946bb1/1635508983241/Levelling+up+broadband+connectivity.

29 Draft NPF4's overall lack of detail is problematic at different levels. As the framework will become part of the statutory development plan, such details are essential to facilitate its implementation, as a planning framework based solely on targets lacks credibility. As it stands, the NPF seems to be a skeletal policy, with no significant details on priorities, trade-offs or investment priorities, thus there is no opportunity for the Scottish Parliament to fully assess and scrutinize this. Moreover, NPF4 should be accompanied by a set of key documents, including an infrastructure strategy and an indicative budget, to allow proper scrutiny.

30 **In response, the RSE calls for the development of an accompanying infrastructure investment strategy to enable a series of targeted, strategic investments that consider capital investment and support infrastructure delivery requirements underpinning NPF4.** As such, the various capital investment programmes which exist across the Scottish Government should be examined and challenged for alignment, and if endorsed, accounted for within NPF4 to enable the identification of priority solutions to issues which cut across the housing, environmental, transport, health and social care, and education sectors. The proposed Scottish Futures Trust's approach to consultations to prepare the delivery plan should take into account these aspects.

31 The underlying rationale for the selection of the 18 key national projects that underpin NPF4's *National Developments* and inform the development of *Local Development Plans* should be clarified to (1) explain why each criterion has been selected and how it contributes to the framework's overarching goals, especially reaching net zero emissions by 2045 (2) contextualise it in relation to delivery timelines and the wider prioritisation of policies, and (3) maintain consistency in relation to the goals of previous NPFs.

32 Policy and funds should strongly support the maintenance, retrofitting, re-use, and re-purposing of existing physical assets (for example through VAT, appropriate support for community asset transfer and strengthened space standards). For new construction projects, improved building regulations (which account for carbon goals), mixed-use accommodation development targets and wider community energy proposals (such as the *Heat in Building* Strategy's proposal for a National Public Energy Agency) should be built into development plans.[26]

33 There is a lack of clarity over who the delivery agents for NPF4 will be, or what strategic partnerships will be involved as part of this, including the role of the private and third sectors. **In response, a stakeholder mapping exercise should be undertaken to facilitate a comprehensive understanding of the actors involved in the delivery of NPF4. Following this, a clearly articulated governance structure should be developed to assign responsibility for the delivery of ambitions to relevant stakeholders, whilst accounting for the specificities of place.** In doing so, NPF4 should be revised to more clearly articulate the links between local communities, arm's length bodies (quangos), local authorities, central Government, Scottish Futures Trust, and Scottish Enterprise in terms of investment requirements and funding availability.

34 The RSE calls for **any progress against agreed outcomes to be measured through the assembly and use of relevant evidence to ensure the priorities can be benchmarked, realised, and enforced**, through for example, a series of quantifiable targets or indicators.

35 **The RSE calls on the Government to better integrate any learnings from the planning system (including experimentation and adaption), so that the final NPF is reflective of efficient collaboration across sectors and scales.** In response, methods of sharing of expertise and resources across local planning authorities and disciplinary boundaries, through for example, the work of the Improvement Service, the provision of appropriate training courses and the implementation of design review panels as part of delivery plans, merits exploration within NPF4. The understanding of local politicians, and their key role in promoting better planning and investment decisions should not be overlooked in knowledge sharing and training initiatives.

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26 Scottish Government (2021) *Heat in Buildings Strategy – achieving net zero emissions in Scotland's buildings.* [online] Available at: https://www.gov.scot/publications/heat-buildings-strategy-achieving-net-zero-emissions-scotlands-buildings/.

36 Local and regional entities have been tasked with delivering many of the objectives outlined in NPF4 through Local Development Plans. However, NPF4 risks adding to a busy and complex policy landscape around place-based regeneration, with its multiple priorities and added reporting pressures complicating, rather than simplifying, Scotland's approach to planning. This situation is made more challenging in the context of budget cuts, departmental mergers, and early retirement of skilled staff in local government in Scotland. The planning sector has collectively suffered a 42% cut in real terms since 2009, despite an increase in planning duties and obligations. Relatedly, planning services across Scotland have lost approximately one third of staff since 2009. The draft NPF4 includes a number of additional duties which will place a significant cumulative resource burden on planning authorities and other stakeholders.[27] In response, **NPF4 should establish supportive routes into the planning sector, underpinned by fully funded resourcing and skills programme, which prepare future planners to respond to complex, interdisciplinary societal issues** which go beyond the traditional tenets of town planning education, such as transitioning towards a net zero economy.

37 **Formalised risk analysis should accompany NPF4 to aid the identification of mitigation plans to accompany a delivery plan.** Indeed, the Scottish Government has maintained an online Action Programme for NPF3 to reflect progress towards delivery.[28] NPF4 would benefit from the creation of a live/online document that sets out any key risks identified and is updated regularly to monitor progress.

38 **An NPF4 Oversight Group, tasked with the creation of an Annual Report monitoring any progress in relation to NPF4's goals and highlighting any areas for improvement, should be established.** The findings of this group could be incorporated within a targeted investment programme to support the delivery of NPF4's

objectives. Youth engagement should be a critical element of this Oversight Group to ensure wider societal buy-in and increase awareness of NPF4.

39 **NPF4 should outline its delivery priorities, to for example, situate 20 minute neighbourhoods in relation to other policy proposals, and unpack any tensions between competing priorities.** The draft NPF4's inconsistencies should be explored, including by unpacking why some policies are presented as universal whilst others at targeted at specific areas. Otherwise, the proposed final strategy will likely result in a lack of clarity of intent for users, and difficulties for decision makers.

40 The RSE recommends that NPF4 is revised to ensure concepts (e.g., the circular economy, which is not mentioned under the *conserving and recycling assets* spatial principle) are used consistently and coherently across different sections of the document. Any revisions to NPF4, while sharpening some aspects as highlighted in these recommendations, should also look to shorten the overall length of the document.

41 The RSE suggests that draft NPF4's annex and glossary are of limited value and require revision to boost their utility and connect them to the other sections of the report.

COVID Recovery

42 Community resilience and local resources have been significantly diminished as a result of the COVID-19 pandemic. A collective effort is required to ensure that empty town and city centres and closed-up local facilities do not become a blight for local populations. Innovation, creativity, and supportive planning legislation can, and should, make a difference. The RSE strongly encourages the Scottish Government to incorporate any related feedback garnered through the recent consultations into *new realities of retail and e-commerce in Scotland and local development planning* in the design and implementation of NPF4.[30]

27 For more information, see here: RTPI (2021) *Resourcing the Planning Service: Key Trends and Findings in 2021*. [online] Available at: https://www.rtpi.org.uk/research/2021/june/resourcing-the-planning-service-key-trends-and-findings-2021/.

28 Scottish Government (2019) *National Planning Framework 3: monitoring report*. [online] Available at: https://www.gov.scot/publications/national-planning-framework-3-monitoring-report/documents/.

29 See, for example, RSE (2021) *RSE Response to Scottish Parliament call for views on Scotland's Supply Chain*. [online] Available at: https://rse.org.uk/expert-advice/advice-paper/rse-response-to-scottish-parliament-call-for-views-on-scotlands-supply-chain/.

30 Scottish Parliament (2022) *New realities of retail and ecommerce in Scotland*. [online] Available at: https://yourviews.parliament.scot/efw/towncentres/; and Scottish Government (2021) *Local development planning – regulations and guidance: consultation*. [online] Available at: https://consult.gov.scot/planning-architecture/local-development-planning/.

43 Population health (both mental and physical) has been negatively impacted by the COVID-19 pandemic and is a major contributor to decreased productivity.[31] **Improving population health and wellbeing should be a key priority for policy and decision makers and indeed the NPF4.** This interlinks with a need to reassess how communities engage with, and experience ownership over planning policies which directly impact their everyday lives and wider communities.

44 The COVID-19 pandemic has underscored the importance of an effective digital infrastructure to maintaining societal connectivity, an issue which is particularly pertinent for Scotland's Highland and Island communities. Audit Scotland's *Digital Services Strategy 2018-2021* underlines the inefficiency in public spending in addressing digital capacity issues to date. With hybrid working becoming the norm for many, digital infrastructure should be accounted for within NPF4. In doing so, **NPF4 should strike a balance between resolving digital infrastructure issues to, for example, ensure every property is connected to ultrafast broadband, whilst also acknowledging the primacy of people-focussed jobs in, for example, the health and care and leisure sectors, and their requisite need for transport links when shaping future planning policies.**

45 The COVID-19 pandemic has also emphasised the importance of planning for the future, including accounting for risk scenarios.

Future Imperatives

46 A clear vision of what Scotland will be in the future should be emphasized and directly derived from NPF4. This should involve prioritising the use of assets to meet future challenges, in line with, for example, a policy of 'Re-purpose First' alongside 'Town Centre First'.

47 The major challenge that is streamlined across other areas of government policy is that of climate change. **NPF4 should mainstream and prioritise adaptation to fully address the implications of climate change (e.g., the adaptations required to mitigate the impacts of rising sea levels on coastal communities, increasing rainfall and storm damage and changes in land use across the country).** It should prioritise the means of achieving the national goal of reaching net zero by 2045, including retrofitting existing buildings and the use of heat. [32] Moreover, the NPF should account for other impacts and required adjustments as a result of demographic changes led by (i)migration and the ageing population.

48 **NPF4 should look to harness the benefits of big data and artificial intelligence to enable a proactive, anticipatory approach to planning, which could be supported through the commissioning of research with Higher Education Institutions.**[33]

49 As explored by the RSE in a separate policy advice paper, **to more fully account for the Scottish Government's fiscal, economic, social, and environmental objectives, the Scottish tax system should be revisited, with due attention given to territorial fiscal equalisation measures, to provide more equitable local access to public funds and services across local authorities and the planning system.**[34] This would provide a means of overcoming urban/rural funding disparities and would enable NPF4 to tackle the 'postcode lottery' that can stymie access to service provision. This also provides an opportunity to ensure consistency with the Scottish Government *National Strategy for Economic Transformation's* call for *A Fairer and More Equal Society* to deliver economic transformation by implementing local taxation for local services.

31 For more information on this see David Hume Institute (2018) *Wealth of the Nation: Scotland's Productivity Challenge*. [online] Available at: https://davidhumeinstitute.org/past/2018/9/7/productivity-research-launch-wealth-of-the-nation.

32 Indeed, the Climate Change Committee highlighted a number of shortcomings in relation to Scotland's preparedness for the impacts of the climate emergency which could be addressed through NPF4. For further information see: Climate Change Committee (2022) Is Scotland climate ready? 2022 *Report to Scottish Parliament Recommendations*. [online] Available here: CCC-Is-Scotland-climate-ready-Recommendations.pdf (theccc.org.uk).

33 On the potential of big data and AI solutions, see for example: Yigitcanlar, T., Kankanamge, N., Regona, M., Ruiz Maldonado, A., Rowan, B., Ryu, A., Desouza, K.C., Corchado, J.M., Mehmood, R. and Li, R.Y.M. (2020) Artificial intelligence technologies and related urban planning and development concepts: How are they perceived and utilized in Australia?, *Journal of Open Innovation: Technology, Market, and Complexity*, 6(4): 1-21.

34 Royal Society of Edinburgh (2021) *RSE Response to the Scottish Government's Tax Policy and the Budget Consultation*. [online] Available at: https://rse.org.uk/expert-advice/advice-paper/tax-policy-and-the-budget/.

35 Further information on the Scottish Government's National Strategy for Economic Transformation is available online, here: https://www.gov.scot/publications/scotlands-national-strategy-economic-transformation/pages/8/. Crucially, any local financing arrangements would merit an accompanying assessment of any equalisation mechanisms to ensure equity in the provision of public services across Scotland.

50 The RSE calls for greater clarity over the programme envisaged to prepare the final NPF and the delivery plan after the consultation period and would welcome any opportunities for further engagement with the development and implementation of NPF4. This includes the opportunity to discuss the decision-making process embedded within NPF4 with the Scottish Government and the Scottish Futures Trust, perhaps through a roundtable discussion.

Additional Information

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KNOWLEDGE MADE USEFUL