

Pausing NPF4

Dear Tom Arthur MSP,

This is a request to press the pause button on the progress of the National Planning Framework (NPF4), in order to clarify what the Scottish Government seeks to achieve, and identify the means by which the core ambitions of the plan might be delivered.

Some three years ago, the UK Collaborative Centre for Housing Evidence, led by the University of Glasgow, established a Housing and Place Delivery Forum in Scotland – bringing together a wide range of policy officials, professional experienced practitioners, and academics, all of whom are engaged in housing and built environment activities.

This Forum has met regularly and published evidenced-based papers and opinion pieces on housing and place matters. Chaired by an Independent Chartered Surveyor, the Forum comprises experts from the public, private and third sectors, to discuss and debate critical issues and challenges in both policy and practice. Deliberations have been highly collaborative, demonstrating that those with differing motivations can find common ground through discussion and informed debate.

With such available wisdom and experience, it was clear that the Forum should prepare a statement responding to the draft NPF policy proposals. The following observations are based on identifying workable policies and practices that will inform us in delivering better outcomes and creating a culture of collaboration.

We are concerned that the current draft document, while containing great ambitions for Scotland, is short on indicating how these aspirations might be delivered.

In our respective responses to the Government's consultation, we have noted the lack of detail contained within the draft document and the absence of a clear delivery plan, backed by financial commitments and an effective monitoring process.

Among other things, members of the Forum feel that NPF4 must do more to:

- Consider the key determinants of the planning process, especially the country's changing population and demographics, and likely patterns of economic change;
- Ensure stronger strategy links with Housing to 2040, A Scotland for the Future, Scotland's National Strategy for Economic Transformation, and the Heat in Buildings Strategy;
- Develop and articulate a more considered, professional basis for describing the policy and planning geography for the country to replace the existing ad hoc regionalisation at the core of NPF4's discussion of economic prospects;
- Determine how, and where, strategic investment and infrastructure will be prioritised and funded;

- Recognise that housing is more than a spatial land use but a critical health, social and economic need that benefits everyone in Scotland;
- Address the very diverse needs of urban and rural Scotland, and the inter-relationships of regions, towns, cities and communities;
- Articulate a clear way of regulating and monitoring design outcomes, particularly with the significant changes associated with '20 minute neighbourhoods'; and,
- Address the issue of local planning authorities' resources and capacity to deliver, and the contradictory policies that exacerbate rather than improve procedures and processes.

Faced with this lack of clarity and uncertainty, the Forum recommends that there is a need to press the pause button on the progress of the NPF4.

This will give the Scottish Government more time to consider the issues raised and the general consensus that greater explanation and evidential direction is required on how the propositions contained within NPF4 can be delivered. Once the process is paused, a major first step should be to engage further with all key stakeholders to radically rethink the spatial and organisational framework for delivering NPF4.

Currently, at the national level, the framework is discussed in terms of broad, ad hoc regions that do not align with any of the existing structures of government or governance in Scotland. One solution to this problem would be to re-organise and democratise regional economic partnerships, so that they can become agents for delivering strategic change; and, converging quango boundaries, so that health, housing and economic development can be planned together and more effectively.

Within a renewed spatial framework, there is also need for a dedicated and specialised national agency with real expertise in the social, environmental and economic aspects of spatial development of housing and infrastructure at different scales.

Such an agency should support, rather than displace, regions and local authorities to deliver complex projects and interventions. The precise scope and purpose of such an agency requires further consultation, but the general concept of a national team of people with the skills and experience to oversee major infrastructure, energy, digital, housing, and capital programmes, enjoys broad-based support among those involved in planning for and delivering homes and places in Scotland.

This is not a start-from-scratch, as Scotland has many of the resources and assets needed to do this, but existing expertise is dispersed across different silos and levels of government. For Scotland to Build Forward Better, we need to rationalise what we have, strengthen it, and democratise its operations at sub-national levels.

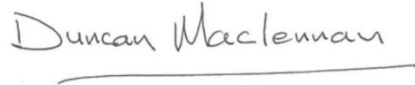
Given the significant impact NPF4 will have on housing delivery, and the clear shortcomings in the current draft document, we strongly encourage the Scottish Government to engage further with us, beyond the current consultation deadline of 31 March, to discuss our concerns and develop the ideas outlined above.

We need to get NPF4 right, both for current and future generations.

Signed,



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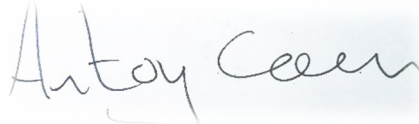
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