Summary of SCDC’s response to Scottish Parliament consultation of NPF4

**Intro**

The Scottish Government has published its fourth National Planning Framework (NPF4).  It sets out how places and environments will be planned and designed in the years to come.

NPF4 is described as a long-term plan for Scotland that sets out how the Scottish Government’s approach to planning and development will help to achieve a net-zero, sustainable Scotland by 2045.

[You can read the NPF4 here](https://www.transformingplanning.scot/national-planning-framework/draft-npf4/?id=3904#?id=3904).

**Consultations**

The Scottish Government is currently seeking views on NPF4, and its consultation is open until 31st March 2022. You can find the consultation on the Scottish Government’s [consultation portal](https://consult.gov.scot/local-government-and-communities/draft-national-planning-framework-4/). SCDC intends to submit a response.

SCDC has already contributed to a separate Scottish Parliament consultation on NPF4. [Click here to find our response alongside other published responses](https://yourviews.parliament.scot/lgc/npf4/consultation/published_select_respondent?_b_index=60&sort=excerpt&order=ascending). We’ve also summarised the main points of this response below. You may find it helpful if you are thinking of engaging with the current Scottish Government consultation, or you may wish to speak to us in order to help improve our response.

**Our key points so far**

**A need for stronger commitments**

SCDC agrees with many ambitions of NPF4, including aiming for net-zero planning, building a wellbeing economy, promoting equality and human rights and increasing community participation and empowerment. However, the framework needs to make stronger statements for each ambition in order to help achieve them.

To help achieve net-zero, for instance, **low-carbon and zero-carbon design, sustainable transport and renewable energy have to be stated as requirements, or conditions, for sustainable planning, rather than as things to be encouraged. There should also be a clear statement that planning which will undermine Scotland’s aim of achieving net zero should be avoided, such as high/medium-carbon design, unsustainable transport and fossil-fuel energy.**

**Similarly, to help achieve a wellbeing economy, the framework needs to state clearly that** new investment and other support for business and entrepreneurship will be supported *where* these improve social and environmental wellbeing. This point can be extended to human rights and equality. Put simply, a clear statement should be made that planning should only be carried out and supported where human rights and equality are promoted, protected and fully taken into account.

We say more on participation, empowerment, inequality and poverty below.

**A need for more detail**

**In addition to strengthening its ambitions, the NPF4 needs to provide more detail on how it will achieve them.**

**In particular, the framework should say more about how it will empower people in disadvantaged communities to shape planning and, as a result, have more control over what happens in and to their communities. We propose that this can be done in the following ways:**

* **In addition to advocating planning *for* empowerment, NPF4 needs to emphasise, or explain, how communities will be empowered to participate *in* planning.**
* **Given their reach into, understanding of, and trusted role in disadvantaged and marginalised communities, the role of community and third sector organisations** as key partners should be stated throughout the framework
* At the same time, community organisation is fragile in disadvantaged communities where there are fewer resources. There should be a clear commitment in NPF4 around support and proactive engagement with marginalised and disadvantaged communities.
* Where place-making is referred to, the role of community-led approaches should be emphasised which are key to ensuring that places reflect the priorities of those who live in them. This includes community-led action planning and community-led action research accompanied by community capacity building support.
* Sustainable planning, place-based approaches (including local place plans) and community-wealth building can be effective in helping to build sustainable and, indeed, distinctive communities if they are accompanied by good community engagement informed by the National Standards for Community Engagement and community capacity building support to ensure all groups in the community are empowered to take action.
* More reference should be made to the National Standards for Community Engagement, which are not statutory requirements in themselves, but are recognised within a range of wider legislation, by Scottish Government and a range of public bodies, as good-practice principles designed to improve and guide the process of community engagement. They are a way to ensure that engagement is early, collaborative, meaningful and includes all groups likely to be affected.
* We would also expect to see a requirement to conduct an equality impact assessment where appropriate, in addition to ensuring planning adheres to the Fairer Scotland Duty.
* There should be a requirement for planning departments to build their own capacity, bringing in support where required, to understand and carry out effective community engagement that addresses inequality and promotes equality and human rights.

**Participation**

Participation is key to achieving much of what the strategy contains, and should be given more emphasis throughout. There is too often a presumption that local and affected communities will act as a barrier to progressive planning. However, where this has happened there has often been a lack of good engagement, support and communication when planning decisions have been made. There is evidence that by working with communities and supporting them to take part in informed dialogue from an early stage, decisions and planning can be improved.

We propose the following approaches to strengthening participation:

* The establishment of a high-level steering or advisory group for NPF4, tasked with engaging with diverse and under-represented voices. The group would include a range of people with roles in relation to areas ranging from equality and inequality through to climate change and depopulation in rural areas.
* Increased and better co-production and use of participatory democracy approaches, including citizens panels and lived-experience panels.
* The addition of another principle around participation and empowerment, in which planning will reflect the priorities of the people who are affected by it. This would help ensure that the wider principles are founded on good engagement and support for every community to take part.
* A greater emphasis on bottom-up participation, as opposed to top-down engagement such as consultation. Where community-led action plans, local place plans and other community-led efforts to engage (including participation requests) exist, these should be welcomed and integrated into planning at an early stage.

**More information**

Scottish Community Development Centre is involved in a considerable amount of policy and ‘on-the-ground work’ in relation to planning, including:

* Contributing a community development perspective to place-based approaches and related concepts such as 20-minute neighbourhood and community wealth building.
* Supporting community organisations and local partners to develop community-led action plans which identify and set out community priorities in relation to planning and other local issues.
* Contributing to the development of the Planning (Scotland) Act 2019, specifically around local place plans, involving Scottish Government-commissioned engagement with a range of stakeholders to inform the development of this element of the Act. As part of this work, we developed [the ‘How to’ Guide for Local Place Plans](https://www.gov.scot/publications/local-place-plans-guide-literature-review-final-report/).
* Responding to Scottish Parliament consultation on the Planning (Scotland) Act.
* If you want to find out more about planning policy and practice, including helpful links and introductory guides, visit the [local services and planning section of Communities Channel Scotland](https://www.communityscot.org.uk/resources/policy-lowdown/local-services-planning).

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