

Local Government and Communities Directorate  
The Scottish Government  
St. Andrew's House  
Regent Road  
Edinburgh  
EH1 3DG

18<sup>th</sup> February 2020

To whom it may concern,

**Response: Scotland's Fourth National Planning Framework Position Statement**

The Institution of Civil Engineers (ICE) is the independent voice on infrastructure and the leading source of expertise in infrastructure and engineering policy.

ICE is a global body with 92,000 members. ICE Scotland represents around 9,000 members, who are drawn from across the public, private and academic sectors. Our members design, build and maintain Scotland's critical transport, water and waste, flood protection and energy infrastructure as well as educating the next generation of engineers. However, we are not a trade body.

Our Royal Charter requires that we act in the public interest and the following comments have been developed in this way.

**Resiliency will underpin future ambition**

There are welcome ambitions within the position statement – particularly around transitioning towards net zero carbon, taking a holistic approach to infrastructure development, facilitating design solutions and innovation, and ensuring this plan works in tandem with other areas of policy – in particular the Infrastructure Investment Plan.

ICE Scotland has long called for an increased programme of infrastructure maintenance and adaptation, and we welcome the recognition in this plan that, where possible, it is prudent to maximise the use of our existing assets.

The reality however is that substantial portions of our infrastructure are underperforming. Alongside historic under-investment in asset maintenance, our assets are facing new challenges they weren't built to withstand – from demographic-driven use-case shifts through to climate-change-driven extreme weather events.



From landslips to flooding, events over the last few years have highlighted the fragility of parts of Scotland's infrastructure network and the very real impacts that infrastructure disruption brings to Scotland's economy, people and places.

The vision for Scotland's places and communities, set out in the NPF4 Position Statement relies on our existing infrastructure assets – utilising them fully and bringing forward new infrastructure where required. But you cannot build on unstable foundations. Unless our existing infrastructure is adapted, enhanced and properly maintained so that it is more resilient, these policy ambitions will be jeopardised.

ICE Scotland is therefore calling on government to conduct a **resiliency audit** of Scotland's infrastructure – working holistically with industry and expert bodies to take a strategic view of infrastructure weaknesses, opportunities and ultimately where government interventions and appropriately directed funding can have most impact.

### **Adequate Resourcing, benchmarking and monitoring**

Our existing planning system has suffered from considerable resource constraints, with developers across a variety of infrastructure assets often reporting frustrations with delays and costs. If the ambitions underpinning NPF4 are to be realised, government must ensure adequate funding and resourcing – particularly at local authority level.

It will be important for both government and industry to have a clear framework to measure progress towards achieving NPF4 ambitions. Systems of tracking, benchmarking and monitoring should be brought forward, allowing government to assess the efficacy of planning, policy and regulatory interventions and enabling industry to understand, measure and articulate how infrastructure designed, maintained and adapted sits against the plan.

ICE Scotland members are well positioned to be part of the creation of strong, productive and sustainable places for the people who live in them for generations to come. We would welcome further engagement in this work as it develops.

Yours sincerely,



Hannah Smith

**Director**

ICE Scotland

