

Research Project: Scotland's Fourth National Planning Framework Position Statement – Analysis of responses to the consultation

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Executive Summary

Context

This summary sets out key themes arising from a consultation on the Position Statement on the Fourth National Planning Framework (NPF4) that was published in late November 2020¹. The Position Statement set out current thinking on the issues that will need to be addressed when preparing NPF4, making clear that the approach to producing NPF4 will continue to be a collaborative one, that no decisions have yet been made, and that the Scottish Government will continue to work with a wide range of stakeholders to develop the proposals over the coming months.

In total, 251 respondents made a submission. The majority of respondents (201) were organisations, with 50 individual members of the public also making a submission. The submissions received were very diverse, ranging from relatively brief statements through to very extensive responses commenting on all the key outcomes and many of the potential policy changes outlined in the Position Statement. Where consent has been given to publish the response, it can be accessed at <https://consult.gov.scot/planning-architecture/national-planning-framework-position-statement/>.

A Plan for Scotland in 2050

The Position Statement explains that NPF4 will include national planning policies, providing a clear and coherent plan for future development and will have the status of development plan, informing day-to-day planning decisions. It will embed the UN Sustainable Development Goals and Scotland's national outcomes and will have the Place Principle as a key driver. The long-term strategy will be driven by the overarching goal of addressing climate change and is expected to focus on achieving four key outcomes: Net-Zero Emissions; Resilient Communities; A Wellbeing Economy; and Better, Greener Places.

There was broad support for:

- The general direction of NPF4 and the ambition for climate change to be the overarching priority.
- Embedding UN Sustainable Development Goals and Scotland's national outcomes.
- The four key outcomes set out in the Position Statement.
- Focus on the Place Principle.

Respondents also made a number of general points highlighting the importance of:

- Consistency of approach and of alignment of NPF4 with other plans, strategies and policies including the Climate Change Plan update, the Infrastructure Investment Plan, the National Islands Plan, the National

¹ The consultation paper is available at <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/>

Transport Strategy 2 (NTS2), the Land Use Strategy and Regional Spatial Strategies, and with city/growth deals.

- Collaborative working across policy delivery areas, including across planning and other sectors and statutory bodies.

There were general calls for use of stronger or more robust language setting out clear requirements rather than simply encouraging change. The need for resources was also an issue highlighted across a number of responses with financing, upskilling and enforcement of planning controls all identified as necessary for delivery.

Some respondents expected to see more on the response to COVID-19 in the Position Statement, for example with respect to new working patterns that may become established and on priorities for supporting the post-COVID recovery. It was argued that there must be a green recovery with the principle of net zero embedded at its core.

Respondents also highlighted what they would like to see as central approaches to NPF4 including that:

- The focus should be on its purpose as a land use planning document constituted as part of the statutory Development Plan.
- Climate change and biodiversity crises should have equal recognition. Although it was acknowledged that the Position Statement recognises climate and nature crises to be ‘intrinsically linked’ it was suggested there is little mention of the nature crisis or action to address it elsewhere in the document.
- A place-based approach should embed public health and wellbeing at the centre of climate change decision-making.
- Planning for waste management and the circular economy should form a key pillar of NPF4.
- Consideration should be given to opportunities that would be offered by a ‘biodiversity net gain’ policy approach’ including mirroring ‘natural capital’ planning approaches adopted elsewhere in the UK.

There were also calls for greater involvement for communities in planning decisions and for the planning system to address a perception that, at present, developers can steer the process for their own benefits.

A Plan for Net-Zero Emissions

Prioritise emissions reduction: There was broad support for the focus on tackling issues relating to climate change and agreement that achieving net zero emissions should be the over-arching priority of the spatial strategy. It was observed that the short timescales mean it will be important that Scottish Planning Policy (SPP) can be implemented as quickly and easily as possible by Planning Authorities.

There was also support for the emphasis on renewables and for the focus on strategic levels of planning. It was agreed that an urgent and radical shift in policies

will be needed, although a stronger commitment to the climate change priority was also thought to be necessary.

Integrating land use and transport: There was support for integrating land use and transport and a particular welcome for embedding the NTS2 sustainable travel hierarchy in NPF4. Respondents highlighted the high levels of carbon emissions from transport as a sector and, within this, the proportion generated by private cars. There was also support for directing development to locations that reduce the need to travel and are well served by sustainable transport options. Some respondents pointed to the need to understand limitations of the sustainable travel hierarchy in rural areas.

Facilitate design solutions and innovation: While there was strong support for retrofitting existing buildings to improve their energy efficiency, the scale of the challenge was also highlighted. There were calls for new development to be carbon neutral, energy efficient or built to Passivhaus principles and ‘future-proofed’ as far as possible. Facilitating development of networks for renewable and zero emission heating was supported and the importance of alignment of NPF4 with the forthcoming Heat in Buildings Strategy was highlighted.

Promote nature-based solutions: There was support for promoting nature-based solutions in respect of climate mitigation and also with respect to benefits to biodiversity, adaptation to flood risk and improved air quality. The role of nature-based solutions in cities was highlighted and it was suggested NPF4 should acknowledge that blue/green infrastructure solutions are also a form of nature-based solutions. Referring to use of vacant and derelict land in the context of nature-based solutions was proposed, and the role of greenbelt land in mitigation of climate change was highlighted.

Deliver infrastructure to reduce emissions: Respondents expressed support for the Infrastructure Investment Plan, including the priority given to enhancing existing assets over new build, and for updating the spatial framework for onshore wind. A number of respondents noted and welcomed the statement that it is expected “that NPF4 will confirm that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments.”

A Plan for Resilient Communities

Apply the concept of 20 minute neighbourhoods: This approach was described as an exciting and challenging opportunity to make local places the focus of people’s lives. Many of the comments noted the connections between the 20 minute neighbourhood approach and other themes set out within the Position Statement, including in relation to reducing carbon emissions, infrastructure first and the use of vacant and derelict land. A number of comments addressed the challenges around delivering 20 minute neighbourhoods in a rural context. The difference between creating a new 20 minute neighbourhood and achieving 20 minute neighbourhoods within existing communities and developments was also highlighted.

Strengthen community resilience: There was support for the focus on the climate emergency and its impact on community resilience. Future-proofing the built environment was described as crucial to responding to the threat of climate change. The connection was also made between addressing surface water flooding and drainage and other themes covered in the Position Statement, for example in relation to blue/green infrastructure solutions and tackling vacant and derelict land.

Promote inclusion and equality and eliminate discrimination: There was support for efforts to strengthen public trust and involvement in the planning process, but also some concerns about whether or how this can be delivered. It was suggested that there is a lack of narrative about how the community involvement goals will be achieved. Local Place Plans were described as a welcome, community-driven approach to support place-based solutions.

Improve our health and wellbeing: There was support for putting the needs of people and their health and wellbeing at the heart of the planning system, and for the focus on the six Public Health Priorities. A number of respondents commented on the extent to which the COVID-19 pandemic has both shone a light on the importance of locality as a foundation of resilient communities and introduced additional pressures on the health and wellbeing of those communities.

Actively plan and support the delivery of good quality homes: Comments included broad support for NPF4 setting out a long term view of the homes required to meet Scotland's future needs. The references and connections to Housing to 2040 were also noted and welcomed.

There were two broad but interconnected themes running through many responses. One of these reflected the focus on the SPP and Housing consultation, and the specific policy proposals set out within the Position Statement in relation to housing land supply and Housing Land Audits. There was also a considerable focus on the ambition set out in the Position Statement that homes should be “accessible, affordable, well designed and energy-efficient with the right homes in the right places to support both urban and rural communities”.

Promote an infrastructure-first approach to community development: There was support for taking an infrastructure-first approach, although it was also suggested that the approach needs to be more clearly defined. A number of the comments addressed the infrastructure-related implications of 20 minute neighbourhoods, both in terms of the range of services required and the implications for travel, and particularly active-travel related infrastructure. It was also suggested that detailed consideration of infrastructure and service provision should be central considerations for future land use decisions and development plans.

Enhance and expand natural infrastructure: A number of respondents noted the importance of natural (blue and green) infrastructure and its contribution to resilient communities. The recognition that the management and maintenance of natural infrastructure is essential was welcomed and there was support for nurturing and expanding natural networks, with greenspace described as critical social and physical infrastructure that provides essential services to people and the

environment. As at other themes, some respondents noted how the COVID-19 pandemic has highlighted the health and wellbeing benefits of having access to good quality greenspace, but also on spatial inequalities across the country.

Achieve more sustainable travel: The focus on achieving more sustainable travel was welcomed, including refocusing policies to draw out how land use planning can build in sustainable travel choices. However, it was also noted that the principle of integrating land use and transport planning and reducing the need to travel have been embedded in transport and planning policy for a number of years. It was suggested that there needs to be a strengthening of the intent and definition around the principles set out. There were also a number of references to the importance of NPF4 aligning with NTS2 and the key role of NTS2 in providing the right infrastructure in the right place at the right time if the infrastructure-first approach is to be delivered.

A Plan for a Wellbeing Economy

Support a sustainable and green economic recovery: Many respondents expressed their support for this focus, and the role of NPF4 in supporting the transition to a net-zero, circular economy. There was also support for specific elements of the approach to a sustainable and green recovery as set out by the Position Statement, including a spatial strategy targeting investment in areas and sectors where jobs and investment are needed most, and which can help to deliver wider economic and environmental targets. Some respondents suggested more linkages with the 'plan for net-zero emissions'.

Reduce inequality and improve health and wellbeing: There was support for NPF4 having a role to play, including through helping deliver jobs in the right sectors and right places. There was a view that NPF4 provides an opportunity to address negative health and wellbeing impacts in some places, and to create more places which support good health and wellbeing. Respondents also saw a role for NPF4 in ensuring the move to a wellbeing economy is delivered in a fair way, with a framework for economic development aligned with public health principles and committed to tackling health inequalities.

Provide certainty and flexibility to encourage investment: It was seen as important that NPF4 strikes the right balance between the certainty of a plan-led system, and the flexibility required to respond to social and economic change. Respondents also referred to a number of specific sectors seen as having potential to contribute to government objectives, and where there was a perceived need for NPF4 to do more to encourage investment. These included renewable energy, ports, transport infrastructure, aquaculture, and recycling and waste management.

Grow our food and drink sector: Some respondents expressed their support for the priority assigned to growing Scotland's food and drink sector. This included a focus on the economic significance of the sector, particularly for rural and island communities. Some respondents raised concerns about proposed support for the aquaculture sector. However, others suggested that the aquaculture sector has been changing rapidly in recent years and wished to ensure that NPF4 is based on an accurate picture of the sector and its current environmental impact. The extent

to which sustainable growth in the aquaculture industry is important in tackling the challenges facing rural and island communities was also highlighted.

Support sustainable tourism development: There was support for the focus on enabling sustainable tourism development and for the commitment to building on investment through the Rural Tourism Infrastructure Fund. The economic significance of tourism at national and regional levels was noted, with references to a particular need to support recovery following the COVID-19 pandemic. Respondents also expressed specific support for the need to strike a balance between providing the infrastructure required to support tourism, while protecting the interests of local communities and minimising environmental impacts.

Stimulate culture and the creative industries: There was support for a stronger focus on culture and the creative industries. This included a particular focus on the potential contribution of these industries to health and wellbeing and as a significant economic sector, with potential to support regeneration of deprived areas. Some respondents also expressed a view that a wellbeing economy requires a stronger role for communities, for example through community businesses and social enterprises.

Transition to a circular economy: Reference to the circular economy was welcomed, including in relation to wider climate change policy priorities and to support economic recovery. There was also support for recognition of a role for the existing built environment and of opportunities for existing and new economic sectors to respond to the transition to a zero carbon Scotland. The effect of the COVID-19 pandemic in hampering progress on elements of the circular economy (for example through reintroduction of single use plastics) was noted and it was argued NPF4 should seek to protect and build on progress made prior to the pandemic.

Promote sustainable resource management: In relation to peatland, there was support for the reference to preservation and restoration, and in particular the proposed restriction of further development on peatland to ensure its role in carbon sequestration. However, respondents also highlighted potential tensions between preservation of peatland and other aspects of NPF4, including concerns around a 'blanket ban' on development on peatland. There were calls for NPF4 to set out a clear policy framework for how planning authorities should weigh the relative benefits of peatland preservation against renewable energy or other developments that can offer net carbon benefits.

Secure strategic transport connectivity: There was support for interventions to manage demand for car use, with respondents seeing potential links between managing demand for car use and other NPF4 priorities such as achieving net-zero emission targets and promoting inclusion and equality. However, it was suggested that significant work and investment will be required to achieve the required shift away from car use, particularly outwith urban centres. There was also support for improved transport connectivity to reduce emissions associated with freight.

Improve digital connectivity: Respondents expressed their general support for the inclusion of improved digital connectivity as a priority for NPF4, including noting

its importance in enabling more home-working and reducing travel. The increase in home-working during the COVID-19 pandemic was suggested to have reinforced the importance of access to digital connectivity for all, not only in terms of home-working but also communication and access to services. However, it was also suggested that the COVID-19 pandemic has highlighted the inequality of access to high quality digital connectivity in Scotland.

A Plan for Better, Greener Places

The Place Principle and spatial planning: A number of respondents expressed support for the application of the Place Principle, which was described as a step-change in how planning can look holistically at areas at various spatial scales. In terms of delivering effective placemaking, comments and suggestions included that NPF4 should seek to align spatial planning with assessments of the capacity of places to accommodate new growth and ensure that neighbourhood and place planning are not focussed solely on the provision of new assets which will require funding. However, it was also suggested that a place-based approach should not become too focused on existing assets as a context. It should also identify truly new outcomes and seek to catalyse long term change that addresses social challenges.

Achieve higher quality design: Comments included that improving the quality of design of new development should be a fundamental outcome for the planning process. However, it was also suggested that design should not be seen as 'separate', as it is fundamental to achieving positive outcomes in many other policy areas. In terms of how NPF4 could further support high quality design, suggestions included that a stronger policy direction on the design of places - and incorporating nature based solutions - should be a priority.

Re-imagine city and town centres: There was support for a new approach to town and city centres, recognising the need for these places to be revitalised to create attractive and vibrant places, and the contribution that they can make to wider climate change and economic objectives. Respondents expressed specific support for the "town centre first" policy and links were made to the concept of 20 minute neighbourhoods. Some respondents reflected on the degree of change required of town and city centres, including reference to changing shopping habits and the growth in home-working. A need for funding and investment to achieve the required change was suggested, as was a focus on stabilising the decline of town centres before looking at significant changes in character or use.

Re-use vacant and derelict land and empty buildings: A number of respondents offered their support for NPF4 having a focus on reuse, including recognising the opportunities for re-development. This included specific support for a "brownfield first" approach prioritising re-use of brownfield sites over greenfield development, for the review of green belt policy and for potential expansion of land assembly and compulsory purchase. Respondents also noted the importance of these proposals in terms of reducing development pressure on valuable green spaces, supporting delivery of climate change and other environmental objectives and revitalising town and city centres. Some wished to see NPF4 set out stronger measures to limit greenfield development, although others argued against prioritisation of brownfield

over greenfield development, suggesting that releasing greenfield land for development as part of a planned national strategy could help to contribute to economic and environmental targets.

Actively promote working and living in rural Scotland and the islands: There was particular support for the focus on rural repopulation and for links to land use and other policies and strategies including the National Islands Plan, the Land Use Strategy and Rural Planning to 2050. Some respondents wished to see NPF4 set out more detail on policies for rural development, and that this should recognise that rural and island communities are very varied in terms of the scale and type of development that may be sustainable. The need to ensure that development is supported by sustainable infrastructure, including transport and digital connectivity was also highlighted.

Protect and restore Scotland's natural environment: There was support for strengthening the approach to protecting and restoring the natural environment and for the focus on biodiversity which, it was argued, should be central to decision making throughout the planning process. In addition to protecting existing habitats, it was suggested NPF4 should incorporate policies that make nature recovery a consideration in every planning decision. It was also argued that SPP should support the new Scottish Biodiversity Strategy.

The safeguarding and promotion of forestry, environmentally significant locations and green or blue corridors was welcomed, although it was also suggested consideration should be given to incorporating the concept of 'natural capital', including as a funding tool and economic lever to meet objectives of nature conservation and growth. However, concern was expressed that any application of natural capital approaches must make clear what is expected of everyone involved in the development process.

Protect and enhance our historic buildings and places: There was support for the intention to protect and enhance historic buildings and places, although also an observation that the historic environment is not just buildings and places as Scotland's landscapes – including wild land areas - are largely a product of human activity over time. It was also suggested that the Position Statement should acknowledge that the historic environment is a finite resource which cannot be replaced and should place increased emphasis on facilitating the acquisition and re-use of neglected historic buildings to secure their long-term future.

Adapt our coastline to the impacts of climate change: The potential impact of coastal erosion was highlighted, and it was reported that the Dynamic Coast project is providing case studies that include developing adaptation plans for vulnerable stretches of coast. It was also suggested there could be an opportunity for NPF4 to embed marine and coastal planning in the planning system more strongly and to articulate how and where nature-based solutions could apply, in light of funding for flood risk management and coastal change adaptation announced in the Programme for Government of September 2020. Adapting communities to flood risk and coastal change was noted to have significant resource implications.

Delivery

General comments included that delivery mechanisms to implement NPF4 will need to be robust and innovative and be supported by collaborative partnership working. It was suggested that it will be important that Planning, and specifically Chief Planning Officers, are represented at the highest local authority level to help enable delivery of NPF4.

There were also calls for the delivery programme to be co-produced with local authorities and Key Agencies and for a more cross sectoral approach to both development and delivery of the strategy. It was suggested that wider aspirations, such as the Place Principle, 20 minute neighbourhoods and a wellbeing economy, may be better achieved by looking beyond Planning alone. Support for local authorities in the form of a national delivery agency was also proposed.

Suggestions with respect to funding included that delivery must have resources and costs at its heart and that, ideally, a fully funded delivery strategy should be delivered in tandem with NPF4. A structure for signposting to, and co-ordinating with investment strategies that are led by other interested parties (including public and private bodies) would be helpful; this could advise where investment should be directed, from which sources and for what purposes.

The need for defined timescales and priorities for delivery were also suggested. To allow for better understanding of timeframes for progressing the work, information on the timing of suggested policy changes outlined in the Position Statement was requested. It was also argued that monitoring the impact and outcomes of planning policy should be an integral part of the system. The need for transparency was also highlighted, including publishing performance data and progress reports.

Other comments

Among other comments on the Position Statement there was a request that, in light of the delays to NPF4, interim policy guidance on renewable energy developments should be issued. It was suggested there should be immediate guidance on the planning balance being tilted in favour of the climate emergency, which should be a material consideration in all planning decisions or should be given significant weighting or “special regard”.

Introduction

The National Planning Framework is a long-term plan that sets out where development and infrastructure is needed to support sustainable and inclusive growth in Scotland. NPF4 will be the long-term spatial plan for Scotland to 2050 and, by incorporating Scottish Planning Policy, will also set out Scottish Government national planning policies. It will have the status of a 'development plan' for decision making purposes, meaning it will be used for day-to-day decision making on planning applications.

When the review of the current framework (NPF3) began, the aim was that a draft NPF4 would be laid in the Scottish Parliament in September 2020. However, this timetable was revised as a consequence of COVID-19, and it is now anticipated that the draft NPF4 will be laid in Parliament in Autumn 2021 with a full consultation exercise at that time. NPF3 will remain in force until the new framework is approved.

The Position Statement, published in late November 2020, reflects information gathered during the Call for Ideas on NPF4 carried out earlier in the year. It does not make definite proposals but sets out current thinking on the issues that will need to be addressed when preparing NPF4 which, it is expected, will focus on achieving four key outcomes:

- Net-Zero Emissions;
- Resilient Communities;
- A Wellbeing Economy; and
- Better, Greener Places.

Respondents were asked whether they agreed with the current thinking on each of the four key outcomes, and also for views on delivery and the updated impact assessment report.

The consultation paper (available at <https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/>) makes clear that the approach to producing NPF4 will continue to be a collaborative one, that no decisions have yet been made, and that the Scottish Government will continue to work with a wide range of stakeholders to develop the proposals over the coming months.

Number and profile of respondents

In total, 251 respondents made a submission. The majority of respondents were organisations (201 respondents) with 50 individual members of the public also making a submission.

Around 60% of responses were received through the Scottish Government's Citizen Space consultation hub.

Organisational respondents have been allocated to one of 19 categories by the analysis team and the Scottish Government². A breakdown of the number of responses received by respondent type is set out in Table 1 below and a full list of organisational respondents is provided at Annex 1.

Table 1

Respondents by type	Total
Active Travel-related Third Sector Organisation or Campaign Group	6
City Region or Strategic Development Planning Authority	2
Community Council or Residents Association	23
Culture or Heritage Company, Association, Trust or Representative Body	8
Development, Property or Land Management Company or Representative Body	19
Energy-related Supplier, Developer, Association or Body	28
Environment or Natural Heritage Third Sector Organisation or Campaign Group	17
Greenbelt Campaign Group	2
Local Authority	29
Planning, Architecture or Housing Representative Body or Campaign Organisation	12
Planning, Development, Architectural or Environmental Consultancy	3
Public Body, Commission or Taskforce	9
Third Sector, Community or Campaign Organisation	13
Transport Partnership	1
Transport-related Body, Association or Provider	4
Trade Union	1
Other Infrastructure-related Company or Representative Body	5
Other Private Sector	9
Other Representative Body or Network	10
Total organisations	201
Individuals	50
All respondents	251

As with any public consultation exercise, it should be noted that those responding generally have a particular interest in the subject area. Therefore, the views they express cannot necessarily be seen as representative of wider public opinion.

² Organisations were placed into a group based on name and, where available, after accessing information on relevant websites including the organisation's own website. Classification also took account of the primary driver for the submission.

Nature of submissions

The submissions received were very diverse, with variation in focus, structure and length. They ranged from relatively brief statements through to very extensive submissions commenting on all the key outcomes and many of the potential policy changes outlined in the Position Statement. Some responses were written predominantly to illustrate how particular projects would support the outcomes set out in the Position Statement.

Where consent has been given to publish the response, it can be accessed at <https://consult.gov.scot/planning-architecture/national-planning-framework-position-statement/>.

Analysis and reporting

This report presents a question-by-question analysis of the comments made. Some respondents did not make their submission using the consultation questionnaire but submitted their comments in a statement-style format. This content was analysed qualitatively under the most directly relevant consultation question.

For ease of reference, direct wording from the Position Statement in relation to each of the key outcomes and to delivery of the strategy is presented in the report in text boxes, and a list of all the potential policy changes referenced in the Position Statement is included as Annex 2. In addition to the analysis presented in the report, a Technical Annex listing all comments clearly specific to individual policy changes has been developed and shared with the Scottish Government.

A list of abbreviations used in the report is provided at Annex 3.

Before addressing responses on the four key outcomes (Net-Zero Emissions, a Wellbeing Economy, Resilient Communities and Better, Greener Places) the report considers general comments made in relation to the earlier parts of the Position Statement – the section headed “Our future places” and the overview of “A Plan for Scotland in 2050”.

Our future places

The first section of the Position Statement, entitled “Our future places” opens with two statements:

“Our places will look and feel different in the future. A significant shift is required to achieve net-zero emissions by 2045.”

“We cannot afford to compromise on climate change. If we are to meet our targets, some significant choices will have to be made. We will make these choices next year as we move towards a draft National Planning Framework 4 for public consultation and Parliamentary scrutiny, but it is already clear that significant effort will be required. We will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions...”

A number of respondents commented on aspects of these statements including agreement that a significant shift will be required, and that significant choices will have to be made. It was suggested that there should be stronger emphasis on how delivery of the changes required for climate ambitions also delivers on implementation of other national policies particularly around promoting greater health and wellbeing and reducing Scotland’s inequalities.

The statement that it will be necessary to ‘rebalance the planning system so that climate change is a guiding principle for all plans and decisions’ was supported, particularly by Energy Supplier respondents. Respondents suggested that delivery of renewable energy infrastructure will require greater weight to be placed on climate change considerations, and that decisions made at Local Planning Authority (LPA) level must reflect the urgency of the situation. Specifically, it was argued the system should be rebalanced to give greater weight to the positive aspects of onshore wind developments and less weight to general landscape and visual impacts. It was also suggested that NPF4 should recognise that landscape change is an inevitable consequence of some of the actions required to address the climate emergency and should explain how individual decisions on planning applications are to be guided by climate change considerations.

Comments on the wording of this part of the Position Statement included that:

- Tackling the climate emergency should be ‘imperative’ rather than simply a ‘guiding principle’.
- The planning system should be rebalanced so that ‘tackling the causes and adverse effects of climate change is accepted as an overarching environmental imperative and fully recognised as the guiding principle for all plans and decisions.’
- Inclusion of the words ‘and improves wellbeing’ would help emphasise the centrality of community wellbeing to NPF4.

A Plan for Scotland in 2050

The Position Statement explains that NPF4 will include national planning policies, providing a clear and coherent plan for future development and will have the status of development plan, informing day-to-day planning decisions. It will embed the UN Sustainable Development Goals³ and Scotland's national outcomes⁴ and will have the Place Principle⁵ as a key driver. The long-term strategy will be driven by the overarching goal of addressing climate change and is expected to focus on achieving four key outcomes: Net-Zero Emissions; Resilient Communities; A Wellbeing Economy; and Better, Greener Places.

General points

There was broad support for:

- The general direction of NPF4 and the ambition for climate change to be the overarching priority.
- Embedding UN Sustainable Development Goals and Scotland's national outcomes.
- The four key outcomes set out in the Position Statement.
- Focus on the Place Principle.

Respondents also made a number of general points highlighting the importance of:

- Consistency of approach and of alignment of NPF4 with other plans, strategies and policies including the Climate Change Plan update, the Infrastructure Investment Plan, the National Islands Plan, the National Transport Strategy 2 (NTS2), the Land Use Strategy and Regional Spatial Strategies, and with city/growth deals. Alignment with other levers such as taxation was also suggested.
- Collaborative working across policy delivery areas, including across planning and other sectors and statutory bodies.

There were general calls for use of stronger or more robust language setting out clear requirements rather than simply encouraging change. This was suggested to be important to give local authorities the confidence to make development management decisions focused on the types of development that NPF4 aims to deliver.

There were also calls for clarity around definitions and wording and the need for consistency of interpretation between the Scottish Government and key agencies. A specific request was that NPF4 should differentiate 'culture' and 'the historic environment'.

³ United Nations Sustainable Development Goals
<https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

⁴ Scottish Government National Outcomes <https://nationalperformance.gov.scot/national-outcomes>

⁵ Scottish Government, Place Principle <https://www.gov.scot/publications/place-principle-introduction/>

It was noted that the strategy necessarily lacks detail at present with several respondents looking forward to seeing application of the concepts set out in the full NPF4. However, it was also observed that the lack of detail makes it difficult to encourage communities to respond to a consultation of this type.

The need for resources was also an issue highlighted across a number of responses with financing, upskilling and enforcement of planning controls all identified as necessary for delivery. It was suggested both that review of the Climate Change Plan should include consideration of local authority and statutory body resourcing and that planning fees might be ring-fenced as a resource.

A requirement for flexibility was also suggested, given the diversity of geography, society, economics and environment across the country and a requirement to differentiate between the needs of urban and rural communities was highlighted. Points with respect to the applicability of certain policies in rural areas are covered elsewhere in this report, particularly in the sections on integrating land use and transport and on 20-minute neighbourhoods.

COVID-19

Some respondents expected to see more on the response to COVID-19 in the Position Statement, for example with respect to new working patterns that may become established and on priorities for supporting the post-COVID recovery. It was argued that there must be a green recovery with the principle of net zero embedded at its core.

Other themes

Respondents also highlighted what they would like to see as central approaches to NPF4 including that:

- The focus should be on its purpose as a land use planning document constituted as part of the statutory Development Plan.
- Climate change and biodiversity crises should have equal recognition. Although it was acknowledged that the Position Statement recognises climate and nature crises to be 'intrinsically linked' it was suggested there is little mention of the nature crisis or action to address it elsewhere in the document.
- A place-based approach should embed public health and wellbeing at the centre of climate change decision-making.
- Planning for waste management and the circular economy should form a key pillar of NPF4.
- Consideration should be given to opportunities that would be offered by a 'biodiversity net gain' policy approach' including mirroring 'natural capital' planning approaches adopted elsewhere in the UK.

Other suggestions with respect to general themes and specific topics that some respondents felt were missing from the Position Statement or required much greater emphasis included:

- The role of solar power.

- The role of aquaculture.
- Connectivity.
- Reducing energy use and demand for carbon-intensive activities and high-carbon goods.
- Integration of land reform.
- Improving air quality.
- Delivering a circular economy.
- Importance of the electricity transmission infrastructure.

There were also calls for greater involvement for communities in planning decisions and for the planning system to address a perception that, at present, developers can steer the process for their own benefits.

Finally, although not specifically referenced in the Position Statement, several respondents noted their support for retention of the presumption in favour of sustainable development. It was argued NPF4 should recognise a presumption in favour for net-zero developments within the context of plan-led development.

A Plan for Net-Zero Emissions

The first key outcome is Net-Zero Emissions. The Position Statement highlighted intentions to: prioritise the types and locations of development that will help meet emission reduction targets; build on the Climate Change Plan with action informed by the recommendations of the Just Transition Commission; plan future places that reduce the need to travel and build in natural solutions; make buildings more energy efficient; and facilitate decarbonised heating and electricity generation and distribution.

Further detail on the thinking behind the Plan for Net-Zero Emissions was provided under five headings:

1. Prioritise emissions reduction.
2. Integrate land use and transport.
3. Facilitate design solutions and innovation.
4. Promote nature-based solutions.
5. Deliver infrastructure to reduce emissions.

Question 1: Do you agree with our current thinking on planning for net-zero emissions?

General comments

As in respect of the Position Statement overall there were calls for stronger language with respect to planning for net-zero emissions. For example, it was suggested the first bullet point introducing the Plan for Net-Zero Emissions should be amended so that rather than 'prioritising' certain types of development it reads that 'no development should be allowed which has any detrimental impact either on climate or ecology'.

A further suggestion with respect to these bullet points was that the third point should be amended to read '...planned in a way that reduces the need to travel or promotes active travel, and builds in natural solutions.'

While expressing broad support for current planning for net zero, many respondents also highlighted issues they felt should be included or should have more prominence in terms of achieving net zero emissions including:

- More focus on how tackling net-zero can have a positive effect on place and population health.
- A stronger emphasis on links between the climate and biodiversity crises.
- A role for localised energy solutions, as set out in the recent Local Energy Policy Statement⁶ (January 2021).

⁶ Available at <https://www.gov.scot/publications/local-energy-policy-statement/>

- The potential for solar energy generation in Scotland. It was argued solar photovoltaics should be recognised as part of a renewable energy mix and provided with a favourable planning environment.
- The importance of waste management in reducing emissions and promoting the circular economy.
- Food production and particularly the role of aquaculture.
- Land reform.

Although the Position Statement makes clear that reducing emissions is ‘not about restricting development’ some respondents did not agree that net-zero emissions can be achieved without limiting development.

Prioritise emissions reduction

Climate change will be the overarching priority for our spatial strategy. To achieve a net-zero Scotland by 2045 and meet the interim emissions reduction targets of 75% by 2030 and 90% by 2040, an urgent and radical shift in our spatial plan and policies is required. Scotland’s updated Climate Change Plan will be published later this year, setting a course for achieving the targets in the Climate Change (Emissions Reductions Targets) (Scotland) Act 2019. NPF4 will take forward proposals and policies to support it.

No single development or planning policy can achieve this. The strategy as a whole will be designed to minimise emissions from new development. We will work alongside the development of Scotland’s next Land Use Strategy to guide long-term land use change in a way that helps to reverse patterns of behaviour that are already contributing to emissions. We will do this in a way that achieves economic, health and other environmental benefits through a just transition.

To help inform this, we will bring together and reflect emerging regional spatial strategies and their proposals for strategic development that helps to reduce emissions and aligns with emerging thinking on wider regional land use. The transition from energy intensive to zero carbon economies is a key challenge that is being actively considered across national and regional scales. It is increasingly recognised that the impacts of climate change may be best tackled at a strategic scale i.e. managing flooding through upland management, and capturing carbon through tree planting and strategic peatland restoration. These are some ways in which regional spatial strategies are reflecting these opportunities. Early work shows that there are opportunities for planning to support a transition to a lower carbon economy in areas that include the Firth of Forth, the North East and island communities.

Around 85 respondents made a comment about prioritising emissions reduction.

There was broad support for the focus on tackling issues relating to climate change and agreement that achieving net zero emissions should be the over-arching priority of the spatial strategy. It was observed that the short timescales mean it will be important that Scottish Planning Policy (SPP) can be implemented as quickly and easily as possible by Planning Authorities. Several local authorities either noted that their own Regional Spatial Strategy (RSS) would support the approach outlined in the Position Statement or referenced their own actions and intentions with respect to the climate emergency.

There was also support for the emphasis on renewables and for the focus on strategic levels of planning. It was agreed that an urgent and radical shift in policies will be needed, although a stronger commitment to the climate change priority was also thought necessary.

The target of achieving net zero by 2045 was welcomed, although it was suggested that there could be confusion between targets for net zero emissions in 2045 and outcomes for 2050. There was also support for the interim targets suggested.

However, some respondents expressed a view that greater urgency or more ambition, is required, or that there needs to be greater emphasis on plans for the next three years and on targets for 2030. A specific suggestion was prioritising schools to reach net zero by 2030, both in order to improve the learning environment in school buildings and also to give students first-hand experience of the changes that need to be made, rather than sustainability being taught as a futuristic concept.

Some respondents argued the urgency of addressing climate change, coupled with the delay to NPF4 until the spring of 2022 means that interim policy guidance is needed with respect to strengthening support for renewable energy. This is discussed further at Question 7.

It was also argued that a true net-zero target should take full responsibility for all Scotland's production and consumption emissions so should, for example, incorporate assessment of emissions arising from imports of manufactured goods and food.

An alternative perspective, from a small number of respondents, was that the proposals set out in the Position Statement are too ambitious, with potential adverse effects on the less well-off.

Overall, it was suggested NPF4 should create an enabling framework for rapid deployment of a diverse renewable energy mix across Scotland, including wind, solar, tidal generation, community renewable energy projects and a range of storage solutions, including battery storage and pumped hydro.

Emissions from new development

The proposals on emissions from new development were suggested to be similar to those introduced in recent Local Development Plans (LDPs) and it was argued that it will be important to have a process which is understood and can be consistently applied across all planning authorities.

There was agreement with the focus on emissions from new development and a suggestion that carbon emissions cost should be measured for new build at the Planning Application stage. It was also argued that NPF4 should support any development which seeks to achieve reduction in emissions.

Strategic scale approaches

There was support for the strategic approach to tackling climate change – for example with respect to flood management - but it was argued this will require co-

ordination, financial and staff resources and, potentially, consideration of land ownership. The need to align spatial strategies with the Climate Change Plan and the Land Use Strategy was highlighted.

However, concern was also raised that a strategic approach may lead to increases in land prices in areas deemed suitable for development, leading to delays, increased project costs, and increased cost of the energy generated. Further, it was suggested development of a strategic plan will itself take time and could be subject to judicial review, halting development until resolved. For these reasons it was argued preferable to have clear development criteria against which a project can be tested.

Other suggestions

Respondents suggested a range of additional policies to contribute to the target of net zero emissions. These included:

- A publicly owned energy company delivering energy generation.
- Exploring the potential for tidal stream electricity generation.
- Encouraging deployment of heat networks at scale.
- Stronger legislation regarding emissions from shipping in harbours to tie in with blue space development.
- A ban on any new fossil fuel developments - all new coal, oil or gas energy generation developments, including projects below 50MW.
- A presumption against conventional onshore oil and gas extraction.
- No development of further incineration capacity.
- Ending the expansion of the trunk road network.

It was also proposed that NPF4 should bring the various relevant strategies together, in such a way that it can be clear to communities how their own efforts are contributing to overall emission reductions targets.

Integrate land use and transport

The location of development determines the intensity of emissions that it will generate throughout its lifetime. Our strategy will promote future patterns of development that embed the National Transport Strategy 2 (NTS2) Sustainable Travel Hierarchy in decision making. We will seek to promote high quality walking, wheeling and cycling environments, public transport and shared transport options in preference to single occupancy private car use. This will help us to meet our climate change targets and transition towards healthier, more local, zero carbon living and working. Clear choices will need to be made to direct development to locations which reduce the need to travel and are already well served by sustainable transport options.

Our approach will ensure transport options that focus on reducing inequalities and the need to travel unsustainably are prioritised. We also need to maintain and safely operate existing transport infrastructure and services, and ensure our transport networks can adapt to the impacts of climate change. Only after that should investment involving targeted infrastructure improvements be considered. Ultra-low emission vehicles (ULEV), including

electric vehicles will have a role to play, particularly with regard to shared transport, and so we will also plan for electric vehicle infrastructure.

Around 65 respondents made a comment about integrating land use and transport. There was support for integrating land use and transport and a particular welcome for embedding the NTS2 sustainable travel hierarchy in NPF4. Respondents highlighted the high levels of carbon emissions from transport as a sector and, within this, the proportion generated by private cars. However, it was also noted that embedding the sustainable travel hierarchy will be challenging as existing developments will need to be retrofitted and it was suggested multi-layered partnership working will be necessary.

While some respondents welcomed the intention to promote active travel, others argued that simply promoting alternatives to single occupancy car use will be ineffective as long as society is dependent on private cars. One view was that local authorities should be empowered to restrict private car use.

One aspect suggested to be missing from this section of the Position Statement was recognition of the role ports can play in reducing transport emissions including by supporting the movement of freight from road to rail.

Directing development

There was also support for directing development to locations that reduce the need to travel and are well served by sustainable transport options. There were suggestions that:

- Developments that give precedence to active travel and connections to public transport should be prioritised.
- Active travel infrastructure should not be allowed to lag behind provision of new homes since this can lead to residents forming travel habits that are then hard to change.
- Development in car-dependent locations should be restricted.

It was also argued that development could be allowed in locations which are planned to be or could be served by sustainable transport options.

Respondents commented on the potential for development of 20 minute neighbourhoods, support for town centres and restricting out-of-town retail and leisure facilities to reduce reliance on motor vehicles. There were calls for restrictions on development of out-of-town business parks and retail parks.

Facilitating active travel

Elements identified as important to promote active travel were:

- Development and maintenance of active travel routes.
- A requirement that cycling and walking routes must be safe, with safety on separate cycle paths highlighted as a particular issue for children.
- Active travel routes connecting to public transport hubs.
- Storage facilities – for example for bicycles.

The importance of collaborative planning to identify active travel networks was also suggested, with both regional-level networks close to where people live and work and national networks such as the National Walking and Cycling Network highlighted. Opportunities for routes and networks to be greened as part of wider green networks were also highlighted.

While comments on active travel were generally very positive, it was also argued that transport infrastructure is being undermined by the focus on active travel (including the closure of streets to buses) and that the proposals fail to recognise that competing priorities are involved. Caution was also advocated with respect to the proposal that requirement for planning permission for active travel projects should be removed: it was suggested major active travel routes should still be required to go through the planning process in order to ensure communities have a say on routes and possible impacts. Installation of temporary works without any form of consent during the pandemic was reported to have caused problems in some areas.

Public and shared transport

Several respondents commented on the need to provide and promote use of public transport to encourage sustainable travel, including a suggestion there should be greater emphasis on the bus network. The need to make use of public transport a more attractive option was also noted with a suggestion that communities should be given a voice in planning routes, stops and timetables. However, gaps in coverage created after deregulation of public transport were also noted, and that it will be challenging to persuade people to switch from private cars to walking or cycling.

Investment in public transport was also argued to be key for people with a disability, to ensure an integrated public transport system that is affordable, available and accessible for everyone.

The potential of shared transport schemes such as car clubs in reducing emissions relative to private car use was also suggested. A role for shared bike and E-bike schemes in discouraging private car use was also highlighted and development of mobility hubs was suggested to give scope for redesigning street layouts with less space allotted to car parking.

Rural areas

Some respondents pointed to the need to understand limitations of the sustainable travel hierarchy in rural areas, including that walking and cycling may be required over much longer distances and that public transport provision is more difficult to deliver. It was suggested that:

- If local authorities are going to reduce dependency on cars and promote active travel in rural areas, they will require assistance from the Scottish Government, potentially including funding.
- Without significant investment in public transport continued car use in rural areas is inevitable.

- Appropriate weight should be given to the need for single vehicle transport in rural areas and the sustainable travel hierarchy should give positive consideration to electric or hydrogen-powered vehicles.
- An on-demand mobility service could provide travel options in rural areas.
- There should be a shift away from planning authorities only allowing development of new housing in the countryside if the proposed location is accessible by public transport.

There was also a concern that, if development is directed away from rural areas because transport is not considered sustainable, rural communities may lose benefits including public transport infrastructure.

Electric and hydrogen vehicles

The need for enhancement of the existing low voltage distribution networks to support the roll out of electric vehicle (EV) charging infrastructure was highlighted and the work of a Strategic EV Partnership to develop, demonstrate and trial a new joined-up model for delivering strategic infrastructure was reported. The need for further details on what needs to be done to facilitate the development of widespread EV charging infrastructure from a planning perspective was also suggested.

Other issues raised with respect to EV charging included that it will be important to ensure adequate provision of charging points in rural areas, which may be disadvantaged by a market-driven charging system.

There was support for the intention to remove the need for planning permission for EV charging points, although it was also reported that the main barrier to installation is usually permission from the landowner, and it was argued installation of EV charging points at a commercial scale should be subject to planning control.

There were also calls for a fuelling infrastructure for hydrogen powered vehicles. Scope to convert existing petrol/diesel engines to use hydrogen was suggested as a means of avoiding emissions associated with the construction of new electric vehicles.

Requirement for strategic connectivity

While some respondents argued there should be no new road building, or argued against road dualling projects, others highlighted the need for improvements in the strategic road network, particularly in rural areas.

Facilitate design solutions and innovation

We will ensure planning policies support the very significant reductions in emissions from buildings that we need to see. This is not just about new development – our existing buildings and places will need retro-fit solutions and we will make use of the embedded carbon across the built environment. Planning can facilitate low carbon methods of construction, which create a whole building approach to emissions including construction and decommissioning. We will support developments that make use of low energy and emission materials as well as natural and micro-climate features which reduce the

resource demand of the development. We will align our strategy with Building Standards to create a consistent approach, and actively encourage buildings that go beyond current standards where there is appetite to do so. We will also enable and encourage deployment of renewable and zero emissions heating, including by facilitating development of the networks they require.

Around 75 respondents made a comment about facilitating design solutions and innovation. There was support for reducing emissions from buildings and the construction sector and for the proposal to set out a consistent policy for meeting Section 3F of the Town and Country Planning (Scotland) Act 1997 in relation to emissions policies. There was also a view that language used in the Position Statement should be stronger. Intentions to “actively encourage buildings that go beyond current standards where there is appetite to do so” or “encourage new buildings to connect to existing heat networks wherever feasible” were highlighted as illustrations. It was argued that unless mandated, both private developers and local authorities will choose not to implement these measures.

Re-use of existing buildings

Some respondents agreed that support for reuse of existing buildings should be strengthened, although it was also suggested this needs to be aligned to fiscal and other incentives to stimulate re-development, including a funding mechanism to support redevelopment. Commenting on the absence of any mention of investment, one local authority respondent noted that, for them, decaying urban fabric of town centre buildings was a much more significant issue than vacant and derelict land.

However, respondents also highlighted what they saw as limitations in terms of:

- Buildings that do not lend themselves to modern day use.
- Specific requirements of the end users.
- Situations where a net gain from replacement rather than reuse can be demonstrated or where replacement creates an opportunity to intensify land use.
- Complexity and cost/viability of conversion.

Instead, it was argued that each site should be assessed on merit or that:

- There should not be a proscriptive approach where there is limited scope to develop brownfield sites.
- A preference for re-using existing buildings should assess the economic viability and long term future proofing of buildings to assess whether re-use or conversion is realistic.
- Policies might be framed to allow for proportional degrees of new build permission, with re-build favoured for A or B Listed buildings but redevelopment in the form of new sustainable build favoured for C-Listed or non-listed properties.

A focus on carbon assessment was welcomed, although a need for guidance was suggested, as was a requirement that such assessments would need to be built in from an early stage in the development plan process and would need to be

mandatory when applications are lodged for even planning permissions in principle. It was suggested that there will be implications in terms of both resources and time for undertaking such assessments, and in training/qualifications for planning officials in order to appraise assessments when determining applications. The need to ensure a requirement for carbon assessments does not duplicate the Building Standards process was also highlighted.

One respondent reported their own research project to understand both the embedded and operational carbon in pre-1919 building stock.

Retrofitting existing buildings

While there was strong support for retrofitting existing buildings to improve their energy efficiency, the scale of the challenge was also highlighted, including for work on traditional buildings, listed buildings and buildings in Conservation Areas, as well as in rural areas.

In view of the costs associated with retrofitting it was suggested that both advice and financial assistance for owners will be needed, with an expanded Home Energy Scotland advice service, an expanded programme of incentives to support home-owners and private landlords, a Rural Homes Just Transition Package and a reduction on VAT for works to existing buildings all suggested.

However, potential scope for enforcement was queried if the planning system can only require installation of energy efficiency measures when planning permission is applied for.

New development

There were calls for new development to be carbon neutral, energy efficient or built to Passivhaus principles and 'future-proofed' as far as possible. It was also suggested that low carbon heating systems should be required and that opportunities for micro electricity generation should be investigated.

A further proposal was that applications for large scale developments should be required to include energy balance sheets, setting out a validated estimate of the energy demands of the development alongside the degree to which the energy demands will be met by verifiable renewable energy supplies.

In order to promote the actions needed to reduce emissions it was suggested that low carbon choices by home-owners might be incentivised by reducing taxation on more energy efficient buildings and that there should also be incentives for zero carbon development within the planning and building standards systems. However, it was also argued that low or zero carbon development should not provide justification for new development over reuse/retrofit of existing buildings or for development on greenbelt land.

Other issues raised in respect of new development included that:

- Consistent policies should be applied across Scotland to allow home builders to make long term investments in low carbon and fabric-first design.

- Emissions during the building process must be considered as well as those represented in the finished building.
- Offsite construction methods can reduce emissions, with benefits including increased build quality and reduction of waste during construction.
- Habitat mapping data could be used to direct development away from wetland and peat soils as a means of reducing emissions.

Supply chain

Several respondents highlighted the need to ensure a workforce with adequate skills for delivery of the construction methods and retrofitting techniques that will be required. It was suggested this will necessitate extensive recruitment and upskilling. Particular challenges in rural and island areas were noted, and an existing shortage of people trained in retrofit of traditional buildings was highlighted.

Attention was drawn to the role of the college sector, both in supporting innovation and also providing opportunities for workers to develop their skills.

Heating

Facilitating development of networks for renewable and zero emission heating was supported, although it was argued that progress towards delivery of renewable heating and heat networks has been slow to date and that NPF4 must address this by providing a favourable planning regime for their deployment at scale across Scotland. Inclusion of local energy generation schemes under this planning policy umbrella was suggested.

The importance of alignment of NPF4 with the forthcoming Heat in Buildings Strategy⁷ was highlighted, with the draft strategy welcomed as a strong push towards resolving heating issues in a strategic manner. It was also noted that the proposed introduction of a New Build Heat Standard will require new buildings to be installed with a heating system that produces zero direct emissions at the point of use and it was suggested that NPF4 should prioritise approval of heat network schemes by their suitability, prioritising development proposals which cause the least disruption. Progress of the Heat Network Bill was also noted, and the need for alignment with the planning system noted.

The importance of enabling and encouraging a range of low and zero carbon heating options and not purely a focus on district heating was also highlighted. In particular it was argued that for rural areas where there is not a high heat demand and no anchor loads, alternative technologies such as heat pumps should be encouraged. However, it was also suggested that technologies such as air source heat pumps may have visual or noise impacts and that their proliferation without careful management, could have a negative impact on both historic and natural environments. Improving energy efficiency was suggested as a priority in rural areas.

⁷ A consultation on the draft strategy will close on 30 April 2021. The consultation paper is available at <https://consult.gov.scot/energy-and-climate-change-directorate/heat-in-buildings-strategy/>

Provision of funding to offset the costs of low carbon infrastructure and infrastructure reinforcement that enables low or zero carbon technologies such as air source heat pumps to be used more widely was also suggested.

Building standards

There was broad agreement with the proposal that NPF4 should align planning with Building Standards. The need for urgent updating of standards was highlighted, and a key role for Planning and Building Standards to work together to improve standards of new development was suggested. It was also reported that many local authorities already require higher standards than those set nationally for new build construction.

With regard to the proposed alignment it was suggested that:

- Clarification is needed with respect to how meeting the requirements of Section 3F of the Town and Country Planning (Scotland) Act 1997 will be addressed alongside the Building Standard Regulations, as achieving the ambitions set out in the Position Statement will require higher standards for developers to accord with.
- NPF4 needs to articulate exactly what a new relationship between planning and building standards looks like. Guidance is needed as to how the two separate processes can best be brought together to avoid duplication and ensure planning authorities can benefit from the available expertise.
- It would be best for changes to come through Building Regulations where they will be required, as opposed to solely relying on planning policy. Building standards are the more appropriate way to regulate the way in which buildings work and planners may not have the knowledge, skills or time required to assess some aspects.
- The planning framework and the Climate Change Act should drive building standards to the appropriate level.

It was also argued that policy needs to be flexible enough to accommodate advances in technology and understanding of the issues relating to climate change, or that there should be model policies around latest best-practice rather than taking a prescriptive approach.

Low energy and emission building materials

With respect to use of low energy and emission building materials it was again argued that it would be more effective to 'require' the use of such materials as much as possible rather than simply 'supporting' their use. Other points included that:

- These should not be specified by planning but via Building Regulations.
- A presumption in favour of using local materials could be considered a positive way to encourage development that reduces carbon emissions and helps boost the local economy through adding value to local industries.
- Achieving a consistent approach across Scotland may require compiling a 'bible' of embodied emissions and suitable materials. Architecture and Design

Scotland's Library of Sustainable Building Materials was suggested as a possible key resource.

- Clarity will be required on a number of aspects including with respect to the weight given to low embodied energy as opposed to their lifespan of material potential for reuse.

A potential conflict with Building Standards over experimental low carbon materials or need for chemical treatments to make them safe for building use was also suggested.

Promote nature-based solutions

The climate and nature crises are intrinsically linked. It is estimated that around a third of the global mitigation effort needed to deliver the goals of the Paris Climate Agreement could be achieved through nature-based solutions.

Scotland's natural environment plays a vital role in removing carbon from the atmosphere and securing it in natural habitats on land and in our seas. Promoting nature-based solutions to climate change, including tree planting and peatland protection and restoration, and tackling emissions related to soil disturbance and agricultural land use, will be essential to reduce emissions from our land and increase carbon sequestration. They can also help to sustain and grow rural communities and improve the quality of our built environment. Our spatial strategy will explore how we can promote nature-based solutions to climate change, which also protect and restore biodiversity and deliver wider benefits.

Around 45 respondents made a comment about promoting nature-based solutions. There was support for promoting nature-based solutions in respect of climate mitigation and also with respect to benefits to biodiversity, adaptation to flood risk and improved air quality. It was suggested that, in line with the definition used by the International Union for Conservation of Nature, nature-based solutions should be defined as:

“actions to protect, sustainably manage and restore natural or modified ecosystems that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits”.

The role of nature-based solutions in cities was highlighted and it was suggested NPF4 should acknowledge that blue/green infrastructure solutions are also a form of nature-based solutions. Referring to use of vacant and derelict land in the context of nature-based solutions was proposed, and the role of greenbelt land in mitigation of climate change was highlighted.

A requirement for regional scale solutions was also noted and it was suggested it will be important to ensure alignment of NPF4 with other strategies and policies including the Land Use Strategy, Regional Land Use Frameworks, the forthcoming Scottish Biodiversity Strategy, and forestry policies. It was also argued that NPF4 should recognise the value of and commit to a Scottish Nature Network.

While many comments on nature-based solutions were supportive, it was also argued that:

- The role of nature-based solutions is not given sufficient weighting in the Position Statement and the framing of nature-based solutions in the Position Statement is too climate-focused.
- The opportunities offered by a biodiversity net gain approach should also be considered and a clear policy steer provided to stimulate a nature-based solution market.
- Language should be strengthened, so the plan goes beyond “promoting” such solutions.

It was also suggested that NPF4 should set out where the Scottish Government sees the most opportunity for employing the use of nature-based solutions and could explore mapping the opportunities, both large and small, and explain how it will support this the growth of implementation.

Peatland protection and restoration

With respect to protection of peatlands it was suggested that new licences for peat extraction for horticultural use should be prohibited, existing licences should be repealed as soon as possible, and restoration of existing extraction sites should be supported. Protection of deep peat from tree planting or replanting was also suggested.

The potential for conflict between policies to support onshore windfarm development and to support protection and restoration of peatland was highlighted. One perspective was that onshore wind projects can be developed on sites which involve peatland and that in many instances there is a net peatland and biodiversity benefit through extensive restoration opportunities enabled by development. Concerns were raised that promoting nature-based solutions could be used to restrict the further development of onshore wind farms.

An alternative view was that wind farm developments can cause significant damage to peatland and that there is neither guidance for decision makers on what is an acceptable carbon ‘payback’ period for these developments, nor how this should be weighed against associated biodiversity impacts. It was proposed NPF4 should strengthen the consideration given to the likely effects of development on CO₂ emissions, including the long term impacts on carbon storage potential, where peat and other carbon rich soils are present. Generally, greater recognition of the value of soils as a nature-based solution was proposed, as was protection of “ordinary” soils.

Peatland protection is also considered under “Promote sustainable resource management” at Question 3.

Tree planting

Comments in relation to tree planting included that NPF4 should:

- Include policies to encourage conservation and restoration of natural habitats and, specifically, provide strengthened policies to protect existing woodland, ancient woodland and veteran trees.

- Provide a plan-led approach to woodland restoration and creation to achieve the right trees in the right places. A target of planting a billion trees was suggested.
- Encourage establishment of native woodland and promote natural woodland regeneration where practicable.
- Require specific developments to achieve a net increase in tree planting, including woodland enhancement and creation where appropriate.
- Treat offsetting emissions by tree planting with caution since carbon is released from soil during the disturbance associated with planting.

Coastal habitats

In relation to coastal habitats and marine habitats it was argued that:

- There should be areas of no seabed interference to enhance their carbon entrapment and increase biodiversity.
- There should be consideration of sand dunes and saltmarsh which function as carbon stores and are also critical for adaptation and resilience to climate change, flooding and erosion.
- Seaweed farming should be referenced as a means of reducing CO₂ emissions.

Other issues raised

With respect to the historic environment it was suggested that there needs to be a planned approach to implementation of nature-based solutions to ensure proper archaeological assessment can take place and to avoid unintended consequences.

The potential for planning to support local growing and nature-based activities was also highlighted, with benefits not only to mental and physical wellbeing, but also in involving citizens and communities in action to address the climate and biodiversity crises and thereby encouraging people to appreciate how their own decisions can make a difference.

Deliver infrastructure to reduce emissions

We expect that NPF4 will confirm our view that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments. We have made good progress in transitioning from reliance on fossil fuels to renewable electricity generation in a way which is compatible with our environmental objectives. Scotland is a net exporter of electricity and in the past decade renewable electricity output has grown markedly. However, significant further investment will be needed to support new technologies for carbon capture and storage; hydrogen; sustainable and active travel; electricity grid capacity (including subsea links to the islands); and decarbonisation of heating, our transport networks and vehicle fleets.

As a priority, our strategy will need to facilitate the roll-out of renewable electricity and renewable and zero emissions heat technologies. We will need to switch to low and zero carbon fuel sources, and support the delivery of associated infrastructure, such as grid networks and gas pipelines. We will ensure that NPF4 helps to deliver on our wider energy

strategies including the Scottish Energy Strategy (including any updates), our Energy Efficient Scotland route map, the forthcoming Heat in Buildings Strategy, our vision to 2030 for Scotland's electricity and gas network and the Infrastructure Investment Plan.

Around 60 respondents made a comment about delivering infrastructure to reduce emissions. Respondents expressed support for:

- The Infrastructure Investment Plan, including the priority given to enhancing existing assets over new build.
- Updating the spatial framework for onshore wind.
- Expanding and repowering windfarms, although with calls both for a focus on existing sites and for clarification that the support also extends to new projects.

Elements suggested to be missing from the Position Statement or to require stronger support included:

- Solar photovoltaics. Without recognition in NPF4 it was suggested proposals for solar power development could be assessed against similar criteria as onshore wind, despite what were argued to be important differences in both physical impact and the underlying economics.
- Hydro, and marine renewables.
- Household/community energy generation.
- Battery storage, specifically with respect to changes to the current consenting regime. Renewable energy hubs where technologies can be co-located were also suggested.
- Investment in grid infrastructure to accommodate additional demand for electricity. The importance of grid infrastructure to connect to offshore wind projects was also noted. There was a request both that all transmission infrastructure retains National Development status and that direct grid involvement in existing NPF4 working groups is encouraged.
- Waste management infrastructure, including recycling infrastructure and energy from waste plants. Creation of a strategic planning group of multidisciplinary experts to develop the resource management infrastructure system was suggested.
- Policies to support the roll out of Ultra-Low Emission Vehicles (ULEVs).

It was also suggested that reference to the forthcoming statutory duty on Local Heat and Energy Efficiency Strategies, and their intended role alongside LDPs, would be helpful in this section.

Material consideration

A number of respondents noted and welcomed the statement that it is expected "that NPF4 will confirm that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments." As noted previously, some expressed a view that this does not provide the weight that it is required since being a material consideration simply

suggests that it needs to be considered in decision making and does not provide a clear direction to rebalance the system in favour of climate mitigation. However, it was also argued this section needs to be very carefully worded since status as a material consideration could easily outweigh local issues such as a protected landscapes or places of historic significance.

Suggestions included that NPF4 should:

- Include a presumption in favour of renewable energy proposals and specifically of onshore wind applications.
- Make addressing climate change either a significant material consideration or add a test of special regard for climate.
- Make the reversibility of onshore renewable generation projects a stronger material consideration.
- Make action to address the biodiversity crisis a material consideration in planning decisions with equal weight to the climate emergency.
- Make the climate emergency a material consideration for other types of development, including aquaculture.

Appropriately located renewable energy development

With respect to what constitutes an appropriate location for renewable energy development it was suggested that this is not a simple matter and requires further detailed consideration. It was noted that disagreement over whether or not a project is appropriately located is often why developments end up at appeal or public inquiry and it was suggested a clear framework will be required to provide certainty and avoid delays.

A number of respondents suggested that the planning system should attach greater weight to the positive aspects of onshore wind developments or less weight to landscape and visual impacts and there was a suggestion that the term “appropriately located” should be removed, as this is for the planning system to determine. However, others argued that a balance must be struck between delivering renewable energy and protecting nature or protecting landscape quality, or highlighted the tensions between delivering renewable energy and protecting landscapes or recognising the impacts on local communities.

Some individual respondents identified themselves as living in areas where they felt there were already too many wind farms and expressed concerns that the proposed policy changes could lead to further development or voiced opposition to developments currently in construction.

Suggestions with respect to locating renewable energy developments included:

- A national assessment of where renewable energy schemes can be installed with minimal environmental damage that can be built into RSSs and Regional Land Use Frameworks.
- A plan-led approach and a brownfield first principle for onshore wind developments.

- An updated spatial framework for onshore wind that allows appropriately located development to proceed. Concerns with respect to the current framework were highlighted, including with respect to the classification of wild land.
- Discontinued use of Landscape Capacity and Sensitivity Studies and reliance on landscape character studies as part of the Environmental Impact Assessment (EIA) process.
- Consideration of whether developments may be in the long-term public interest – for example by securing positive effects for biodiversity.
- A presumption against new, large-scale built development that would result in excavation and disruption of healthy peatland bogs.
- Retaining the existing policy principle of “the right development in the right place” and not “development at any cost”.
- Retaining the principle of a clear steer on planning policy in relation to areas that are identified as having significance in terms of their landscape, biodiversity and/or carbon sequestration values (such as National Scenic Areas, wild land areas and peatlands).
- Greater emphasis on positive benefits for local communities as a direct result of renewable energy developments, including cheaper electricity costs and investment in local economic development.

Clarity was also requested with respect to two issues relating to wording in the Position Statement that was seen as having the capacity to restrict renewable energy development. First, concern was expressed with respect to the key opportunity regarding ‘shifting future development away from greenfield land including by actively enabling the redevelopment of vacant and derelict land’. It was suggested this could have consequences for the development of new onshore wind sites since there is limited potential for large-scale renewable energy development on brownfield sites. Clarification that support for renewable energy extends to developments on greenfield sites was requested. In a similar vein, clarity was requested that explicit support for repowering and life extensions for onshore wind energy developments does not preclude the possibility of new onshore developments on greenfield sites.

Repowering windfarms

Although there was support for repowering windfarms, it was also suggested that the increased turbine heights associated with repowering require strong policy to address potential adverse effects, and it was argued a balance with respect to landscape effects should still be maintained.

However, a case was also made for considering how processes to repower or amend permissions – including to reflect changes in turbine technology - could be simplified to help more rapid roll-out, and a presumption in favour of repowering and extension was proposed. To avoid any ambiguity, it was also suggested that there should be reference to support for new renewable energy developments as well as to support for wind farms in the context of repowering and extensions.

New technologies

There was support for recognition that investment in new technologies will be required, with a suggestion that clarity is required with respect to what can be considered as zero or low emission technologies.

There were also some differing perspectives with respect to the potential of some of the technologies mentioned in the Position Statement. With respect to hydrogen, it was argued that:

- NPF4 should specify green hydrogen production and infrastructure and that hydrogen is only a renewable fuel source if generated using electricity from renewable sources.
- References to policy and delivery of hydrogen could be stronger and upgrading or upscaling of the gas network to accommodate hydrogen should be included.
- Less prominence should be given to hydrogen since the technology is unproven and there is no evidence it will have a meaningful impact over the timescale of NPF4.

Similarly, it was argued too much prominence is given to Carbon Capture and Storage (CCS) given it is also an unproven technology.

Resources and delivery

It was argued that an 'infrastructure-first' approach must recognise both capital expenditure and revenue costs for councils and public bodies, and that it will not be sufficient to provide only for capital costs.

It was also argued that clear and meaningful engagement with city region deals and partner authorities will be important to ensure that the right infrastructure is delivered at the right time. It was suggested to be unclear at present how this will be achieved.

Other resource implications identified included a requirement for extensive upskilling of the workforce which, it was suggested, should be taken into account when considering the resource implications of the strategy.

A Plan for Resilient Communities

The second key outcome is Resilient Communities. The Position Statement highlighted intentions to: focus on people and the quality of areas where we live; apply concepts such as 20 minute neighbourhoods; set out a long term view of the number of homes required and focus on their location, quality and type; and introduce an infrastructure-first approach to neighbourhood planning. This will be underpinned with policies to support public health priorities, promote inclusion and equality, and help adaptation to the long term impacts of climate change.

Further detail on the Plan for Resilient Communities was provided under eight headings:

1. Apply the concept of 20 minute neighbourhoods.
2. Strengthen community resilience.
3. Promote inclusion and equality and eliminate discrimination.
4. Improve our health and wellbeing.
5. Actively plan and support the delivery of good quality homes.
6. Promote an infrastructure-first approach to community development.
7. Enhance and expand natural infrastructure.
8. Achieve more sustainable travel.

Question 2: Do you agree with our current thinking on planning for resilient communities?

General comments

A number of respondents offered broad support for the Scottish Government's current thinking on planning for resilient communities.

Further general comments in relation to Question 2 included that an explanation of what is meant by the vision for a resilient community would be helpful, and that NPF4 should recognise that Scotland's communities are diverse, will have diverse needs and that 'one size does not fit all'. It will be essential that the creation of resilient communities applies equally across the whole of Scotland, regardless of location.

Respondents also identified certain themes which they thought should be considered in relation to resilient communities, including that this section of the Position Statement makes very little reference to the topic of climate change and net zero targets.

Other issues which respondents thought should be taken into account, or which required greater emphasis included:

- Place Leadership, recognising that a ‘people’ and ‘place’ approach is the underpinning reform which can be central to achieving economic recovery and the alignment of spatial and community planning.
- Links to Community Wealth Building strategies, given the symbiotic focus on localism and resilience.
- How resilient community planning can work for women, including innovative solutions to barriers such as multiple caring responsibilities and the gender pay gap.
- The role of Scotland’s city centres and workplaces as key drivers of the economy.
- Encouraging critical energy infrastructure to be embedded into the community.
- The key role of the college sector in terms of the link between colleges and the communities they serve, as well as a shared vision of the positive outcomes that can be delivered through community partnership.

Apply the concept of 20 minute neighbourhoods

Our spatial strategy and policies will reflect the needs and aspirations of people living throughout Scotland by building quality places that work for everyone. 20 minute neighbourhoods have the potential to reduce emissions and improve our health and wellbeing. We will explore how a new emphasis on living locally could work in different parts of Scotland, from remote rural communities to our towns and cities, taking into account the needs of everyone in society so that equality is built in from the start.

The 20 minute neighbourhood concept doesn’t exist in isolation but scales up to include larger geographies and networked areas providing access and opportunities for the wide range of facilities and services that communities require. The ability to access goods and services through high quality walkable and accessible environments is increasingly recognised as providing strategic competitive advantage to attract and retain people and investment.

This vision will be supported by new and improved planning policies that bring together services and homes, giving life to the Place Principle and supporting public health and wellbeing and reducing inequality.

Around 100 respondents commented on the concept of 20 minute neighbourhoods, with many offering their support for this approach, or the principle that underpins it. It was described as an exciting and challenging opportunity to make local places the focus of people’s lives.

Many of the comments noted the connections between the 20 minute neighbourhood approach and other themes set out within the Position Statement, including in relation to the application of the Place Principle; 20 minute neighbourhoods were seen as offering the opportunity for LPAs, developers and communities to articulate what the place principle means on the ground.

Other comments included that:

- The emphasis on resilience is positive, and it speaks well to the focus on community and health and wellbeing.
- The approach has a role to play in reducing carbon emissions, including by reducing the need for unsustainable travel.
- It has a clear connection to the emphasis on infrastructure first and needs to be underpinned by that approach.
- It will help to create a focus on reuse of brownfield sites and vacant and derelict land. This too will be connected with helping support thriving town centres.

However, it was also noted that it is an approach that will need to be given very careful consideration, since it raises fundamental questions about the nature of places and their role now and in the future.

There was reference to Improvement Service work overseeing a set of three pilot rapid scoping assessments. These are using the Place and Wellbeing Outcomes as a basis to assess the contribution of place to delivering wellbeing and exploring a 20-minute neighbourhood ambition that is specific to Scotland.

Delivering 20 minute neighbourhoods

Wider observations included that NPF4, and associated planning documents, must provide for flexibility in the application and evaluation of a placemaking approach such as 20 minute neighbourhoods. Working alongside local service delivery design and the provision of assets was seen as key, and there was a call for NPF4 to guide national financial resource allocations accordingly to enable local authorities and communities to appropriately assess and integrate future growth requirements, not only within neighbourhoods but also across wider localities.

In terms of how the 20 minute neighbourhood approach fits with, or could support work already happening across Scotland, comments included that it is very much in line with the approach already supported or being taken by many local authorities. There were particular references to:

- Investment programmes for communities and town centres, underpinned by a clear focus on infrastructure first.
- LDPs advocating new developments being centred around the needs of people first.
- Community Wealth Building - a people-centred approach to local economic development which redirects wealth back into the local economy, and places control and benefits into the hands of local people. There was suggested to be great potential to link and consider the 20 minute neighbourhood concept in the context of Community Wealth Building.

Respondents also identified conditions that will need to be in place, or support that will be required, to ensure the 20 minute neighbourhood approach can become a widespread reality. These included that input from outwith the planning system will

need to be harnessed. Specific groups, organisations or services identified as central included:

- The NHS.
- Waste management services.
- The Post Office and banks.
- Business.
- Community stakeholders.

It was noted that some of these key groups or agencies may have been directed down the route of centralising services as an efficiency measure and it will be important to recognise that retaining local facilities, particularly with lowering demand, requires funding. The difficult and complex decision making around rural/village schools faced with falling pupil numbers was cited as an example.

Rural context

A number of comments addressed how the 20 minute neighbourhood would apply, or not, in a rural or island context. The Position Statement's reference to the concept scaling up "across larger geographies" was taken to mean that in rural areas, the 20 minute threshold should not be applied literally. Nevertheless, respondents identified a number of challenges around delivering 20 minute neighbourhoods in a rural context:

- Many settlements have no facilities or services at all and have limited access to settlements that have facilities. People need to travel extended distances to the services they need.
- If the 20 minute timeframe became justification to embargo development in areas outwith a 20 minute radius, the concept would be counter-productive and would do nothing to help deliver the increased population of rural Scotland that NPF4 is also required to help achieve.

In terms of how some of these challenges can be tackled, suggestions or comments included that:

- Transport solutions will be key. It will be essential that people have access to responsive, affordable and regular public transport connected to the jobs and services they need to get to.
- The development of fully functioning local hubs, either for a community or a cluster of communities, will be key and guidance how this is to be applied in rural localities will be important.

As noted more generally above, it was reported that community and resilience focused work is already underway in rural areas; for example, work in relation to the delivery of local jobs and services, minimising the need for unsustainable travel through the expanded use of digital services and resilient public transport networks, and reducing social exclusion. A connected suggestion was that a re-badging of the concept as '20 minute communities' would better encapsulate the wider aim of

building resilience into communities and avoid any perception that it only applies to urban settings.

Applying the approach to existing settlements or communities

The difference between creating a new 20 minute neighbourhood and achieving 20 minute neighbourhoods within existing communities and developments was highlighted. It was noted that the majority of existing built infrastructure will still be in use by 2050, so the retrofitting of existing neighbourhoods to achieve a more liveable and less car-dominated environment is a priority.

Comments included that it will be important for policy to provide a steer on how to identify what needs to be addressed and what the solutions might be. This will need to include guidance around how the approach can be achieved in communities which were created by, and have evolved based on, traditional and long-established patterns of development. In particular:

- It would be helpful to get a steer in relation to how the approach would blend with other initiatives, such as the Town Centre First Principle.
- Consideration should also be given to applying the 20 minute concept to existing places by affording greater planning protection to features such as local employment areas and essential shops and services; Local Place Plans (LPPs) could have an important role in this.

It was suggested that identifying the levers and mechanisms to remediate existing poorly served communities and neighbourhoods will be challenging but will also offer opportunities, including alignment with the focus on vacant and derelict land.

Finally, it was stressed that the focus on placemaking should not deflect from the importance of ensuring new development is also well delivered. Associated points included that the construction and development industry needs to be steered towards building compact forms that prioritise people over cars, and that it will be crucial for the government to balance the need for housing delivery against the long term sustainability agenda which 20 minute neighbourhoods supports.

Key features of a 20 minute neighbourhood

In terms of what a well-functioning or flourishing 20 minute neighbourhood would look like, comments included that:

- A diverse range of services will be needed; this should take account of challenges such as tackling poverty and social exclusion.
- Local environmental quality will need to be considered; if we want neighbourhoods across Scotland to be places in which people are willing to spend the majority of their time locally, then it is crucial that all neighbourhoods are of an environmental condition that we can take pride in.
- Accessible open spaces, thriving natural assets and nature networks will all be essential components.
- Well-planned active travel routes will be key.

- Local heritage plays an important part in the scoping of what a neighbourhood is and provides opportunities for leisure and belonging.
- The right range of retail offerings will be required. As the retail landscape evolves through a highly challenging period, some care is needed around how 20-minute neighbourhoods will function alongside existing networks (and boundaries) of town centres.

It was also suggested that particular attention should be given to the needs of a range of different members of the community, including vulnerable groups, and specifically:

- Children and young people. It was suggested that 20 minute neighbourhoods need to be child-friendly to be sustainable and resilient. There was also reference to the UNICEF Child friendly Cities Model.
- The growing elderly population.

To ensure diverse needs are taken into account, it was suggested that it will be important not just to focus on people living and working in a particular place but to connect to wider organisations – for instance those representing the LGBT community, disabled people, or Gypsy/Travellers. A connected point was that plans around reducing the need to travel will need to take into account that some equalities groups will need to travel to access suitable support and social activities.

Further information or guidance required

It was suggested that a move to developing proper 20 minute neighbourhoods will need NPF4 to drive clear and robust change, alongside leadership from the Scottish Government, to influence local strategic plans and local authority decision making. This framework, giving a clear vision of what a 20-minute neighbourhood actually is, would be crucial to avoiding the phrase being co-opted and used to describe something that is less than what it should be.

In terms of the vision of what a 20 minute neighbourhood is, it would be helpful to have a short description of the concept and some clearer recognition about how the application of this may differ across different areas of Scotland.

Other suggestions included that clear criteria to help support decisions being made would be welcome, including around shifts towards sustainable transport, access to work, amenities and more inclusive housing provision. Other issues needing to be addressed, or about which clarity would be helpful, included:

- How 20 minute neighbourhoods can be delivered in rural areas. The principles are clear - in relation to reduced travel and access to local services - but how can this be delivered outwith the main urban centres?
- What services and employment opportunities should be expected within 20 minutes?

- Where settlement expansion is proposed, how this supports the concept of 20 minute neighbourhoods? How will it influence development management decisions for individual development sites?

There was also a call for national guidance in relation to density and levels of green space.

Strengthen community resilience

A focus on neighbourhoods and local living will help our places to adapt to the impacts of climate change. Our climate is getting warmer and wetter, and more frequent extreme weather events will affect people and places. In summer, more intense rainfall could increase surface water flooding. In winter, more frequent rainfall could bring increased flooding from rivers. Sea level rise could affect the viability of some coastal communities through flooding and erosion. Scotland's Climate Change Adaptation Programme promotes a joined-up approach to place-making that reflects local diversity.

Some places will be more vulnerable to the impacts of climate change than others: flood risk may be particularly acute in parts of our cities, whilst the liveability and accessibility of our smaller towns could be significantly affected by flooding events in the future. By future-proofing the design of our streets and buildings and investing in natural infrastructure, including creating and restoring habitats upstream in catchments, we can substantially reduce our communities' exposure to flooding and the risks from changing temperatures. This also has the potential to provide equality, health, economic and wellbeing benefits for communities.

Around 25 respondents made a comment specifically about strengthening community resilience. Some of these comments addressed aspects of resilience - for example in relation to health and wellbeing or the role of heritage and culture - that are covered under other themes.

Other comments welcomed the focus on the climate emergency and its impact on community resilience. Future-proofing the built environment was described as crucial to responding to the threat of climate change. The connection was also made between addressing surface water flooding and drainage and other themes covered in the Position Statement, for example in relation to blue/green infrastructure solutions and tackling vacant and derelict land. It was also suggested that NPF4 should reflect the Scottish Government's Policy Framework on Water-Resilient Places.

Particular reasons given for supporting NPF4 having a focus on flood risk included that:

- By addressing these issues proactively, the Scottish Government can save money in the long-term.
- It will improve social outcomes for those most vulnerable to the effects of climate change.

- The impact of rising sea levels on existing communities needs to be a national priority. There was a concern that the Position Statement is light on policy measures to adapt our places to rising sea levels.

In terms of overall approach, it was suggested that:

- Resilience will need to cover all communities; urban, rural and coastal.
- There will be a need to expand natural infrastructure, which in addition to building resilience against flooding will also bring many co-benefits, such as improved air quality and biodiversity.

There were calls for a whole-catchment approach to be taken to tackling flooding issues, with other suggestions including:

- Future proofing the design of our streets and buildings.
- Investing in natural infrastructure, including creating and restoring habitats in upstream catchment areas.
- Restricting development in flood risk areas that generate the need for additional flood risk management measures and which put pressure on drainage systems.

Connected to development, and the Scottish Environment Protection Agency (SEPA) Flooding Services Strategy (December 2020), there was a concern that future planning policy could severely restrict the current viability and future development of town centres in coastal locations, including in relation to residential development, and opportunities related to business and industry. This was connected particularly to how future brownfield development and the redevelopment of sites and buildings will be assessed.

In terms of the impact on particular sectors, or the role that particular sectors can play in promoting resilience against flooding, comments included that:

- Ports and harbours have a role to play in protecting communities from flooding, including by addressing flood prevention measures. It was suggested that local authorities should enter into early discussion with port operators and port authorities to ensure that flood protection requirements can be addressed whilst ensuring the requirements for strategic port infrastructure are fully addressed.
- Hydro schemes can sometimes provide the potential for water storage and can enhance natural flood prevention mechanisms.

In terms of specific changes that may be required to deliver against the range of policies and actions required, suggestions included:

- A review of the Flood Risk Management (Scotland) Act 2009, land ownership and agricultural support mechanisms.
- Clearer guidance to help define climate vulnerable communities.

- For some natural flood management schemes land ownership and gaining the agreement of landowner can be an issue and this needs to be considered and addressed in NPF4 and SPP.

Issues relating to resources were also highlighted, including that local authorities will need both revenue for staff and capital for projects. With regards to natural flood management, it was reported that, at present, the majority of projects undertaken in Scotland have been large scale and there was a call for much greater focus on the role that smaller developments have to play, including in their cumulative effects. This focus should be supported by national and local funding, including for retrofit projects.

Finally, in addition to flooding, it was suggested that other related themes should be covered within NPF4 including:

- Managing extreme storm water events.
- Temperature increases, risk of drought and drier summers, and the impact of increasing temperatures, including heat related mortality in older people. Improved water efficiency measures and infrastructure should be considered.

Promote inclusion and equality and eliminate discrimination

The Scottish Government is committed to promoting equality, tackling discrimination and fostering good relations between people in all of our communities. We want to ensure that every person and every community in our country is able to achieve their full potential. The changes we are making to the planning system aim to strengthen public trust and encourage engagement in decisions about the future of our places. The Planning (Scotland) Act 2019 introduces local place plans. Linked to the NPF and local development plans they will provide the opportunity for communities to influence the development of their neighbourhoods in a way which builds on community empowerment across Scotland. These and wider changes also underline the importance of engaging with a wider range of people to develop our places, including children and young people.

We will consider how our future policies can learn from the experience of COVID-19 including by responding to the Social Renewal Advisory Board's recommendations and learning from their work to capture our shared experience of delivering equality and social justice.

The spatial strategy will be supported by new policies to encourage more people to get involved in planning, to improve equality and eliminate discrimination. The 2016 National Standards for Community Engagement, together with the Place Standard Tool, provide a framework for involving people in planning their places. The Place Principle also recognises the need for a more joined-up and collaborative approach to decisions so that the combined impacts on places are understood and actively managed. We will look at how this can support techniques which encompass collaborative approaches to community engagement.

NPF4 is required to explain how our spatial strategy will contribute to improving equality and eliminating discrimination. People living in the most deprived areas and neighbourhoods are more exposed to environmental conditions and other factors that negatively affect health and access to opportunities – including those relating to transport, access to green space, pollution effects, housing quality, fuel poverty, community

participation, and social isolation. Our future places and spaces need to be considered through the lens of gender, ethnicity, age and disability to ensure they are inclusive.

Many different planning policies have potential to directly and indirectly contribute to this, including those which aim to meet housing need, policies promoting community facilities and green space, and those relating to accessibility and design of the public realm. The development of the strategy is being supported by a range of impact assessments which will provide evidence on the impacts of policies on different people in society, and help to inform an approach which is fair for everyone

Around 80 respondents made a comment, with a number of these comments offering broad support for the focus on promoting inclusion and equality and eliminating discrimination.

There was support for efforts to strengthen public trust and involvement in the planning process, but also some concerns about whether or how this can be delivered. It was suggested that there is a lack of narrative about how the community involvement goals will be achieved.

Perspectives on the current situation

A number of respondents gave their own experiences or current impression of planning-related community engagement. These included that:

- Transparency is a key issue, including how decisions have been arrived at, who has been consulted and when. It was suggested that the 'nebulous' nature of the current planning system is both disheartening to the public and highly disempowering.
- 'Consultation' is often simply a public relations exercise and a presentation of what is going to happen. The current system can generate cynicism and a 'why bother' attitude when the active involvement of a community results in outcomes not supported by the community or their locally-elected representatives.
- Communities are regularly ignored by decision makers, both in policy formulation and in policy application and interpretation for individual planning applications.
- The current system enables decisions made locally to be overturned through the appeals system; this needs to be modified to ensure that the community view is a material consideration in planning decisions.

With specific reference to housing development, there were reports that communities have been concerned about the impacts of large-scale housing developments for a long time but have often been cast as the problem. It was also reported that many communities are exhausted from having to repeatedly respond to LDP consultations and modifications, planning applications, appeals and court challenges, sometimes for decades and that their huge voluntary effort is rarely recognised.

It was noted that the stated intention is that “the changes we are making to the planning system aim to strengthen public trust and encourage engagement in decisions about the future of our places”. The behaviour of some developers, and particularly volume house builders, was described as “unreasonable and aggressive” and it was suggested that the planning system needs to protect communities from such behaviours and should identify and seek to proactively encourage positive ‘developer’ behaviours.

Others reported work that is already underway in their area around creating more inclusive approaches. Examples given included:

- The development of a Community Empowerment Strategy, currently being embedded within a Council and their Community Planning Partners, focused on fundamental change in how the planning authority interacts and delivers for their communities, based on the needs of their places/neighbourhoods.
- Foundation Scotland’s work to support over 60 local decision panels linked to over 300 communities across Scotland involved in planning and distributing community benefit funds.
- Provision of a voluntary annual payment from an asset owner to a local community is a direct mechanism for supporting community-led development opportunities and should be encouraged.

Encouraging wider participation

One theme was in relation to encouraging and enabling a much wider range of people to get involved in planning-related issues. In terms of translating this aspiration into reality, comments included that consideration needs to be given to why current policy and rhetoric around participation does not appear to be translating into changes on the ground; what are the obstacles and how can they be overcome?

It was noted that the National Standards for Community Engagement and the Place Standard have now been in place for some time without significant change in how communities are involved in decision making processes. The associated concern was that continuing to draw on these might continue to be ineffective and there was a call for more explicit guidance on what ‘collaborative approaches to community engagement’ means.

It was also suggested that rather than referring to ‘encouraging’ more people to get involved in planning, stronger wording could send a clear signal about moving away from traditional consultation methods where people self-select to get involved; a more active ‘involve more people in planning’ or ‘fully engaging to co-create plans’ would be better. Other suggestions included:

- Making far more commitment to transparency in the planning system.
- Ensuring planners have the necessary skills to promote participation, possibly by having experts in participation in planning departments.

- Giving communities an equal seat at the table alongside developers and the public sector.
- Changing the targets for development and economic regeneration to focus on the processes - and more participatory processes - rather than the inputs.

It was suggested that the timing of engagement should also be considered, and that it should be undertaken early in the planning and design process where it can have the most influence. Further comments included that It should be prioritised during the local plan-making process and could be directly funded through planning application fees or planning obligations. Site-specific engagement and co-design should start very early in the planning process, beginning during or before pre-application discussions with housebuilders and other developers.

In terms of particular communities or groups of people, it was suggested that there needs to be a focus on:

- Harder to reach groups.
- Those who are digitally excluded.
- Older people, including by recognising that digital-only engagement can exclude many older people.
- Children and young people. It was noted that the Planning (Scotland) Act 2019 places a duty on planning authorities to ensure that children and young people are involved in the development of LPPs and that this is particularly important as progress continues towards incorporation of the UN Convention on the Rights of the Child (UNCRC) into Scots Law.

It was suggested that multi-generational planning must be given greater emphasis and that planning policy should recognise and respect that resilient communities will cater for all ages and not sectional or generational interests.

It was also suggested that the views of Community Councils should be given more weight, or that they should be given more powers.

Local Place Plans

Comments relating to LPPs included that they are a welcome, community-driven approach to support place-based solutions. It was suggested that they have the potential to be truly transformative, but that the current priorities and hierarchical structure of the planning system will make it impossible for them to become an integral part of that system. Other challenges or concerns associated with LPPs, included that:

- The financial implications may be prohibitive to the communities that need them most.
- It will be important to acknowledge the unconscious biases and privilege involved in implementing LPPs; the process is not accessible for all communities due to lack of diversity, social deprivation and poverty.

- They are often perceived as housing development documents, with established community groups often reluctant to take on the assumed bureaucracy of planning.
- They may undermine the efforts highlighted in A Plan for Better, Greener Places to prioritise regeneration to tackle geographic disadvantage.

In terms of taking LPPs forward effectively and meaningfully, it was suggested that:

- Framing LPPs in terms of planning for climate change adaptation and land use could generate more interest from the wider public.
- The ambition should be for LPPs to be seen as setting a framework for development within local areas in keeping with the broad aims of NPF4.
- It will be important to ensure LPPs sit within each planning authority's spatial strategy, which in turn must reflect the necessary priorities to tackle the climate emergency.
- NPF4 should highlight the importance of developers responding appropriately to LPPs.
- Heritage Impact Assessments would help define and inform public engagement for production of LPPs.

Along with concerns that LPPs will not have the powers they need to drive transformation, there was a suggestion that the resources will not be in place to ensure that all communities will be able to engage with them equally.

Resourcing community involvement and consultation

Community resources

As noted above, resources were often at the heart of concerns about increased community involvement in planning, including in relation to LPPs.

A number of respondents raised concerns about the resource implications for communities. This was sometimes connected to issues discussed further under the delivery of good homes theme, regarding the balance of financial power between communities and developers.

It was suggested that there will be many areas and neighbourhoods in which communities will not have the necessary resources to take a lead in local place planning. The connection between planning authority and community resources was sometimes made, including that if the planning authority is insufficiently resourced to support the local community, they will not be enabled or empowered to participate in any meaningful way.

There was a call for additional resources and help to ensure that community engagement and involvement in the planning system is shared equitably. A specific suggestion was that constituted community groups and community councils should be given the skills training to help support and empower communities to help address inequalities and reflect community aspirations using LPPs.

Planning authority resources

From a planning authority perspective, concerns often centred around integrating additional duties, such as LPPs into already stretched planning resources.

There were reports that some areas are already seeing interest in LPPs from local communities. However, there was a concern that communities may have unrealistic expectations about the type of support that local authorities will be able to provide, and that the net outcome could actually be to further undermine, rather than boost, relationships between communities and planning authorities.

Promoting equality and tackling discrimination

Other comments addressed the focus on tackling discrimination. There was support for a much stronger ambition to use the planning system to address inequalities, particularly given what is known about environmental determinants of health and wellbeing.

It was suggested that one of the impacts of COVID-19 has been to highlight the importance of both a high quality home and local environment, and links were made to the development of 20 minute neighbourhoods and themes related to the need for high quality private and public outdoor space. These issues are returned to under themes covered below (including in relation to health and wellbeing, housing, place-based outcomes and achieving higher quality design), but in relation to inequality there was particular reference to the disadvantages stemming from inequitable access to high quality greenspace. The intention to introduce new policies for planning green spaces and to address play and playability was welcomed and there was specific reference to data at neighbourhood level enabling targeted interventions to be made where there is real inequity of access to greenspace.

In terms of how the planning system can be used or refocused to address inequity and inequalities, suggestions included:

- Using public interest tests, with outcome-based measures of the social impact of development.
- Ensuring equal rights between different interests in the planning system and planning processes, including an Equal Right of Appeal.

Improve our health and wellbeing

NPF4 will be redesigned to support the population's health and wellbeing and address longstanding health inequalities. We know that planning and place can compound problems such as poor diet and obesity, noise or air pollution, or it can be part of a solution. We will help to deliver a wide range of policies and strategies, including Scotland's six Public Health Priorities, the Active Scotland Delivery Plan and associated commitments to increasing active travel; the new air quality strategy which will replace the

current Cleaner Air for Scotland strategy in 2021; Scotland's Diet and Healthy Weight Delivery Plan; Scotland's alcohol and drug harm prevention and reduction strategies; Scotland's Mental Health Strategy; Scotland's Social Isolation Strategy, and the National Health and Social Care Delivery Plan. The Place Standard also underlines the importance of better health outcomes from joined-up, targeted action in our places.

Tackling health inequalities, as well as supporting the everyday healthcare needs of communities, require a long term plan. The quality of places has impacts on our health and wellbeing, from early years to later life. Planning can do more to directly support positive health outcomes and improve childhood experiences. More people living in Scotland in the future will be older, and we will also need to factor this in to ensure NPF4 properly anticipates our future needs.

Our approach will look at how the built environment can help prevent the need for healthcare spend in the first place, and increase our healthy life expectancy, by improving public health. Inclusive and accessible design, access to infrastructure, including healthy travel choices, and other measures to improve health should no longer be regarded as optional or a discretionary benefit, but a firm requirement for development to address. We will look to promote high quality design and development in sustainably accessible locations that attract investment, create opportunities and alleviate fuel and transport poverty. Natural (blue and green) infrastructure helps build community resilience, and in turn supports our health and wellbeing. Access to quality green space also has direct benefits for both mental and physical health and can help to tackle the impacts of inequalities.

Around 30 respondents made a comment directly related to improving health and wellbeing. General comments included support for putting the needs of people and their health and wellbeing at the heart of the planning system, and for the focus on the six Public Health Priorities. A number of respondents commented on the extent to which the COVID-19 pandemic has both shone a light on the importance of locality as a foundation of resilient communities and introduced additional pressures on the health and wellbeing of those communities.

In terms of delivering improved health and wellbeing, respondents often highlighted the types of conditions or approaches that would be required, including supporting place-based initiatives and solutions. In terms of particular groups that need to be considered when developing those solutions, there was reference to thinking carefully about the ageing population, and how we plan for the needs of older people in a way that is inclusive and sustainable, including maximising opportunities for independent living.

Other themes included:

- Delivering affordable housing in the right places. Creating settlements built to high densities, with mixed use development; offering a range of house types, employment types and activities within close walking distance of each other.
- The need for more localised access to facilities and amenities, including through the regeneration of deprived areas and town centres.
- Maintaining or creating access to open spaces or green networks.

- Prioritising active travel solutions. Creating settlements that are more walkable and where adequate public transport is readily available.
- Building resilience into local economies, including resilience to the impact of Brexit. There was particular reference to the impact of COVID-19 and Brexit on rural and island communities and Scotland's food and drink sector.
- The promotion of digital technology.

It was also suggested that NPF4 needs to introduce a human right to a healthy environment.

With specific reference to planning, health and food, points made included:

- Making a link between planning and place and diet and obesity, with reference to improving access to local healthier food outlets in order to improve health. However, it was suggested more could be achieved through the planning system to better manage the availability of hot food takeaways particular in the vicinity of schools and in deprived areas.
- That while the role of food growing in terms of health and wellbeing is recognised, there is a lack of clear reference to the benefits of food growing on the environment and tackling climate change.

However, it was also suggested that some of the issues referred to – such as alcohol and drug use reduction - go beyond the remit of planning. Conversely, there were issues which respondents thought had not, but should have been referenced. For example:

- It was noted that culture is not mentioned; a missing priority might have read “We have opportunities to express ourselves and feel a sense of connection and belonging in our communities”.
- The role of NPF4 in helping to meet the objectives of the Road Safety Framework and its targets for cutting road deaths, and making roads safer for cycling, should be acknowledged.

In terms of how the various health and wellbeing-related policies and priorities can be delivered, suggestions included that:

- Public Health Scotland will have a role to play as a consultation authority.
- Close working with Health and Social Care Partnerships (HSCPs) might be required and this will have resource implications for both planning authorities and HSCPs.
- Greater cohesion and co-ordination across local authority areas will help ensure that employment, transport, housing, and living opportunities are developed in parallel and greater social division is not inadvertently built into the system.

Actively plan and support the delivery of good quality homes

Our homes make an essential contribution to our health and quality of life and we recognise that good housing is the cornerstone of strong communities. Our future homes will be at the heart of a spatial strategy that puts people first. We expect that our spatial strategy will focus on delivering a wider range of homes to meet the needs of our changing population, in the right places. Our Housing to 2040 route map will be a plan for a well-functioning housing system to deliver good quality, energy efficient, zero carbon housing and housing-related services. The vision will set out how, by 2040, we want our homes to be accessible, affordable, well designed and energy-efficient with the right homes in the right places to support both urban and rural communities. As a first step, we have already committed to review the current housing adaptations system and make recommendations on how best to improve and streamline the system and maximise the impact of investment. This will help to make best use of existing and planned housing stock to provide homes for as many people as possible and enable people to stay in their homes for longer. We will explore how planning can support this, including through an emphasis on type, accessibility, affordable living, quality, choice and energy efficient homes.

Our strategy will do more to guide housing to sustainable locations in a way which still allows for a local approach to be taken to address local issues and opportunities. We will encourage development planning to help shape this in different parts of Scotland. To significantly simplify the system as a whole, we will set out the land required in each local authority area to support local development plans over the life of the plan, informed by national analysis with local input. This will ensure a nationally agreed approach to housing land is used as a starting point for local development plans, and is aligned with local housing strategies and wider strategic investment priorities.

Our spatial strategy will also consider the long term changes that we can expect, including: sustainable rural living, prioritising sustainable and accessible locations; prioritising new homes on brownfield land where appropriate; redevelopment of existing buildings; city and town centre regeneration; and more people working remotely or more locally in the future. Policies will work with these challenges and assets to create great places to live now and in the future. Energy efficiency, in both new homes and the existing stock, is a key objective that will help address fuel poverty and contribute to meeting our climate change targets.

We want to see design at the heart of any new housing development. Details that may seem insignificant in isolation – such as – orientation; colours; shapes; heights; materials and access to public and play spaces – collectively create better development that supports our wellbeing. Our aim is to plan and facilitate the delivery of new places that anyone would be proud to call home.

To build the right types of homes that we want and the amount that we need, we need everyone to work together. Planning can do more to enable development, but it cannot do this on its own. We are considering how our policies can actively support delivery and provide certainty to house builders and communities by providing good, shovel ready land that can be developed in the short term whilst also maintaining a steady pipeline of land that will come forward in the future. We are looking at how we can incentivise house builders to build on sites that have already been deemed suitable for housing by providing a mechanism for more land to be released from the longer term supply, once building begins on sites that already have planning permission. In line with the recommendations of the Infrastructure Commission for Scotland, an infrastructure-first approach will play an

essential role in ensuring allocated sites are a viable proposition to be built out in line with the plan's delivery programme.

Gypsy/Travellers require a positive planning approach so that not just their future, but their current accommodation needs are met. Guidance has previously been published on this, and we have taken steps to raise this with planning authorities. NPF4 is a real opportunity to expand on our current planning policy to support Gypsy/Travellers in their human rights to travel and in their aspirations to invest in their own homes, taking into account research on the distribution of existing sites across Scotland, as well as the provisions of the Planning (Scotland) Act 2019.

Around 80 respondents made a comment about planning and supporting the delivery of good quality homes. Overall, comments included broad support for NPF4 setting out a long term view of the homes required to meet Scotland's future needs. The references and connections to Housing to 2040 were also noted and welcomed. It was described as essential that NPF4 and Housing to 2040 complement each other. There was also occasional reference to the 2020 consultation on Scottish Planning Policy and Housing;⁸ and the issues raised by some respondents very much reflected those from the SPP and Housing consultation.⁹

There were two broad but interconnected themes running through many responses. One of these reflected the focus on the SPP and Housing consultation, and the specific policy proposals set out within the Position Statement in relation to housing land supply and Housing Land Audits (HLAs). There was also a considerable focus on the ambition set out in the Position Statement that homes should be 'accessible, affordable, well designed and energy-efficient with the right homes in the right places to support both urban and rural communities'.

Longer term focus on housing land supply

Turning first to the specific proposals around housing land supply, a number of comments addressed the plan to replace the current focus on maintaining a 5-year supply of effective housing land with a longer term perspective.

Some respondents offered broad support for this refocusing. It was suggested that a strategic method of maintaining a sufficient supply of land for new housing would support the plan-led system more positively than the current arrangements. In terms of how the approach fits with other strategic and policy developments and priorities, comments included that:

⁸ The SPP and Housing Consultation Paper can be found at: <https://www.gov.scot/publications/scottish-planning-policy-housing-technical-consultation-proposed-policy-amendments/>

⁹ Analysis of responses to the SPP and Housing consultation is available at: <https://www.gov.scot/publications/scottish-planning-policy-housing-technical-consultation-proposed-policy-amendments-analysis-consultation-responses/> and the Scottish Government's response to the consultation at: <https://www.gov.scot/publications/scottish-planning-policy-finalised-amendments-december-2020/>

- Emerging RSSs will help to focus housing priorities beyond local authority boundaries.
- The infrastructure-first approach (discussed further below) will be integral to the process of appropriate site selection.

Specific comments about how the approach could be taken forward and/or refined included that:

- A mechanism to enable the release of additional land, already strategically assessed through the plan-making process, would be supported, provided that the process is robust, and that delivery of existing priority sites has been exhausted.
- There should be a mechanism that allows local authorities to bring forward the 'next best option' when a housing land shortfall arises. This would require the planning authority and local community to work together, with input from potential developers, to identify the most appropriate sites.

However, others disagreed with the proposed changes, including querying why such a change is required given that the need for a 5-year effective supply does not mitigate against a longer term approach overall. It was reported that Development Plans are required to look ahead to year 20 currently and there is no reason for this to change.

It was also suggested that the longer term approach would work against the wider aims for resilient, inclusive new places and could be damaging to the timely delivery of homes. Specific concerns included that:

- It could create a constraint to the delivery of new private and affordable homes in the early part of the plan period (i.e. the first 5 years) and an over-reliance of non-effective sites that may never become effective/deliverable within the LDP period (10 years).
- This could create a requirement for public funding intervention to support delivery of non-effective land in a less co-ordinated manner. This approach will not only burden the public sector with debt but also reduce the number of all tenure homes delivered.

Rather than shifting to a longer term approach, it was suggested that the policy should be changed back to the requirement for at least a 5-year supply of housing land at all times. The compound method should be used to look at past delivery against the housing land requirement to ensure the housing needs and demands are being met and that the plan is meeting its housing land requirement.

If the Scottish Government proceeds with taking a longer term perspective on effective land supply, it was suggested that there must be appropriate checks and balances in the planning system. For example, the Gatecheck process should be used to critically assess the established housing land supply, not only in terms of site effectiveness but also site programming.

Housing Land requirement – a national approach?

When respondents commented, they generally supported there being a nationally agreed approach to setting the housing land requirement for each local authority. Reasons given for supporting this approach included that it would or could help streamline the preparation of LDPs and should facilitate a move away from endlessly debating housing figures and targets.

Further comments included that in setting targets for the scale of housing to be allocated in LDPs, it will be important to consider the ways in which local housing markets function across local authority boundaries and cognisance must be given to the spatial priorities in RSSs. It was also noted that the approach to establishing housing supply requirements must be appropriate to rural as well as urban areas, and there was a call for local input to ensure local needs are met.

However, others disagreed or noted concerns about taking a national approach to setting land requirements. Their comments included that it is beyond the remit of NPF4 to identify the 'land required' for housing in each local authority area.

Associated points were that:

- NPF4 should be the place where the housing numbers required to meet need and demand are identified, by local authority area.
- The amount of land required to fulfil this need and demand will then be determined by a range of other LDP policies, such as housing types and densities, and these will vary spatially as appropriate.
- The planning system should not seek to micromanage housing land release but should retain some measure of appropriate housing land supply that allows for effective forward planning and monitoring.

Sustainable, balanced communities

In connection to policy related to identifying housing land and new housing development, a number of comments addressed the impact on existing communities. These comments generally referred to communities seeking to prevent large scale residential development. It was reported that local communities can feel powerless and defenceless, including when faced with the financial resources that major developers can deploy.

Location and number of homes

A number of the comments addressed the type, mix and location of housing development required going forward, with many considering the appropriate location for new homes and offering support for an approach based on delivering quality development to appropriate locations. The infrastructure-first approach is discussed in greater detail below but, in summary, and in specific relation to housing development, comments included that a proactive approach to providing

land for homes and jobs with an appropriately assessed understanding of need and demand for housing provision is essential.

Respondents sometimes made the connection to the 20 minute neighbourhood approach, and that housing development plans should support the delivery of those 20 minute neighbourhoods.

Further, and returning to the effective land supply issue discussed above, it was suggested that local authorities should allocate a wide range and mix of housing sites in their local plans, at different sizes and scales, and in different locations to achieve a balance of tenures and dwelling types. This mix should be informed by rigorous evidence on local need and demand.

In terms of what would be considered appropriate locations for development, for some, the focus should be on existing settlements, and there was support for prioritising use of brownfield sites and vacant and derelict land. However, an alternative perspective was that brownfield sites with high ecological value should not be used for housing.

While it was acknowledged that it can be more complex and challenging to identify and deliver smaller sites within existing settlements, it was also suggested that meeting housing land supply requirements by large-scale site allocations brings significant disadvantages, including:

- Restricting activity to only those developers who have the capacity and knowledge to deliver large-scale projects. Limiting the participation of smaller developers reduces competition, the pace of housing supply delivery and consumer choice.
- Large-scale allocations tend to drive the type of mono-use relatively low density development that would fail to meet the principles of a design value standard focused on creating 20-minute neighbourhoods.

Use of vacant and derelict land is covered in greater detail at Question 4, but in summary comments raised in relation to housing development included that:

- The technical impact assessment of appropriate sites should be completed during the local plan process, rather than as part of site-specific planning applications further downstream.
- NPF4 should support local authorities and public bodies to change their approach to land disposals to bring more sites into use, valuing the wider economic and social benefits along with the disposal value. It could also explore ways to allow landowners and developers to spread the costs of bringing marginal sites into use.
- Communities should have a voice in defining whether and how the land should be developed.

Some respondents also suggested there should be a firm presumption against greenfield site development. In particular, it was suggested that NPF4 should protect important areas of green space and biodiversity from new developments,

unless there is a highly significant economic and/or social justification to do otherwise.

Other comments about appropriate locations for housing development included that:

- Consideration should be given to incentivising building “on sites that have already been deemed suitable for housing” by introducing a presumption against the renewal of planning permissions for housing developments or, in the case of larger sites, a requirement for a phasing agreement whereby planning permission would be revoked if the permitted housing is not delivered.
- Developments should not lock-in car dependence, should be accessible by active travel and should be well served by public transport to ensure their long-term sustainability and resilience. It was suggested that no new housing developments which necessitate car ownership should be allowed.
- NPF4 should recognise that National Parks need their own approach to housing and should deliver on this. New housing should be focused on meeting local need and on people who are not in a position to buy or rent on the open market.

The density to which properties should be developed was also raised. On the one hand, some respondents were concerned about a perceived drive to building to a higher density, and a view that this does not lead to the creation of balanced communities, or a high quality living environment. It was suggested that the COVID-19 pandemic has shown how much we need space to live, and consideration should be given to reinstating minimum sizing standards or raising minimum levels of space provision.

An alternative perspective was that, particularly given the commitment to the 20 minute neighbourhood, density of development in cities and towns needs to be considered at levels sufficient to provide a viable market for goods and services and for frequent public transport services for journeys out of the area. It was reported that standard housebuilder development models are typically too low in density, particularly where greenfield development is needed, to support that approach. It was suggested that there is an opportunity to promote more sustainable land uses including higher density affordable housing in established urban areas, with more housing and other development on former brownfield land, helping to support our town and city centres.

Property type and tenure mix

Other comments addressed the type and mix of housing that is required or should be developed. It was suggested that NPF4 must provide clear policies that ensure the availability and delivery of a range of types and tenures of housing, and that any approach should be applicable in both urban and rural settings. It was also suggested that it will be important to focus on the needs and preferences of

communities rather than simply allowing the profile of new housing to be decided by developers.

When assessing the property mix required it was suggested that consideration be given to intergenerational needs and requirements, so that all ages can feel a part of the community.

The particular issue of accessible housing supply was raised, including through calls for the needs of groups such as older and disabled people to be explicitly considered at every stage of the development of NPF4 and the other policies and strategies that will sit alongside it. Respondents also made a range of specific suggestions relating to the delivery of accessible housing provision and how NPF4 should enable and support that delivery. They included that:

- The review of accessibility standards needs to happen as a priority.
- NPF4 should introduce accessible housing-related targets and reporting and monitoring obligations on local authorities. A minimum of 10% of new housing should be built to wheelchair-accessible standards.
- Local authorities' obligation to meet the Public Sector Equality Duty when planning new housing should be embedded in NPF4.

Other suggestions in terms of how NPF4 should seek to frame housing development going forward included that the focus should be on mixed tenure approaches.

Comments often addressed the importance of new affordable supply, and it was seen as imperative that NPF4 supports the prioritisation of affordable housing development through the planning system. However, it was also suggested that policies to strengthen affordable housing provision should not apply a blanket increase to the provision of affordable housing above the current 25% requirement. The associated concern was that to do so could deter investment, particularly in marginal rural areas.

Some respondent wished to see a particular focus on social rented supply, with further comments including that there is good evidence that the benefits of growth and investment extend well beyond the housing sector – for example through supporting better outcomes and reducing costs to health and other services.

Other comments included that the development of new social housing could be supported by:

- Enabling local authorities to buy land at its existing use value for developing new homes and communities.
- Mandating that the first use for land made vacant by the demolition of social housing should be new social housing.

Rural areas and repopulation

The issue of affordable housing was also highlighted in the context of rural supply where it was suggested that the lack of affordable housing is a major contributory factor in young people and families relocating away from rural areas, and that addressing this issue will be key to reversing rural depopulation.

The connection was also made to a range of other factors, such as economic development and stimulus, that can help create resilient, rural communities. Examples given included in relation to renewable energy and food production and specifically aquaculture. It was reported that offering an appropriate range of housing to meet various needs, including having stock that will attract people to relocate to the region and take up economic opportunities, is critical.

One suggestion was that there should be an overarching presumption in favour of sustaining rural populations in planning policy and decisions. In terms of the scale, type and location of development, comments and suggestions included that:

- In rural areas, planning should rely on more fine-grained approaches than the standard HLA. Approaches should identify untapped housing demand and place less reliance on traditional measures of need and demand.
- The focus should be on existing settlements where possible, with new development looking to support the viability and vibrancy of existing town centres and smaller settlements.
- Small-scale developments are often required to enable people to take up employment. Opportunities for farmers to provide housing should be examined, including for their workers and for retiring farmworkers in order to facilitate succession planning.

Good quality, well-designed and energy efficient homes

Many respondents commented on the Position Statement's focus on good quality, well-designed and energy efficient homes. Those who commented generally welcomed putting design "at the heart of any new housing development". This was described as a critical step in the right direction, with NPF4 pivotal in delivering this in practice by ensuring that great design of both the built and natural environment is a requirement rather than simply a "nice to have". In terms of how good design can be facilitated, comments and suggestions included that:

- Design value standards would offer a key starting point but must be met by fundamental changes in the way design governance is practiced at the local level. The recommendations set out in *Delivering design value: The housing design quality conundrum*¹⁰ were reported as focusing on the ways in which local people are involved in decision making about where they live, the way that land is allocated for future housing, and how new development is masterplanned.

¹⁰ Available at: <https://housingevidence.ac.uk/publications/delivering-design-value-the-housing-design-quality-conundrum/>

- A number of planning authorities have been successfully utilising design review panels which could be adopted more widely.
- It will be crucial to monitor the outcomes of NPF4 to avoid the current gulf between ambitious national objectives and poor implementation at the local level.

It was also suggested that the requirement to see “design at the heart” should not be solely a requirement for housing developments. If the aim is for mixed use, 20-minute neighbourhoods these will be comprised of multiple competing and supporting uses. Design should be at the heart of all development and from the inception. It was suggested that masterplans, and other formal design governance tools such as design codes, should be consistently employed as a formal regulatory mechanism for creating well-designed places. Further comments included that:

- Local authorities should establish a design vision and masterplan for allocated housing sites and should engage widely on its contents with both local people and development stakeholders.
- Reference to orientation, colour, shape, height, materials and access to public and play spaces can assist in reducing carbon emissions through use of solar gain.

With reference to high quality homes, it was suggested that this aspiration should be applied to all types of new buildings, with all development constructed to withstand the test of time.

In terms of energy efficiency, comments included that it is essential that homes are built to be as energy efficient as possible and future proofed. It was suggested that NPF4 can contribute to net zero carbon emissions by ensuring all new builds, private and social, achieve the highest standard of space and energy efficiency performance using Passivhaus or similar approaches. Specific suggestions included:

- Construction across all tenures must involve environmentally friendly carbon zero building materials.
- A major public sector-led programme of retrofitting existing housing.

Other issues

Existing housing stock: Housing and housing land policies in the NPF4 must be aligned with Scotland’s emission reduction targets and follow the principles of a circular economy. As such, the main focus should not be on new development, but on revamping existing housing stock and other existing buildings and bringing empty homes back into use. The introduction of a regular national housing quality audit, to determine the quality of the housing stock and of new housing settlements in terms of climate, biodiversity, adaptability, amenity and other outcomes should be considered.

Housing adaptations: It was noted that the majority of the housing stock Scotland will have in 2045 has already been built and it was suggested that there is a need for better coverage of how we can sensitively and effectively adapt properties.

Different housing models: There was reference to many reports that have examined the potential benefits of promoting co-housing and other housing models that could allow older people to live well in the community. It was suggested that local authorities or the Scottish Government could support pilot projects.

There was support for proposals to promote self and custom build. It was suggested that self and custom build can make a vital contribution to housing delivery across Scotland. Further, and perhaps for rural areas in particular, this method of housing allows for a substantial quantum of local housing to be delivered, but without communities feeling that they are being 'overwhelmed'. It was seen as important that NPF4 offers further support to allow self-build it to make a greater contribution to housing in Scotland, and to increase its visibility to landowners who may then be emboldened to seek planning for a self-build project themselves.

Also with reference to promoting self and custom build housing and other innovative approaches to delivery, the reference to linking with the potential for Masterplan Consent Areas (MCAs) was noted. It was suggested that the MCA mechanism is well-suited to small-scale development of housing and may provide a means of controlling and encouraging development in rural areas that might otherwise not be permitted under housing in the countryside policies. However, the administrative resource implications for planning authorities of preparing and maintain a list of people interested in self-build was also highlighted.

Gypsy travellers: There was support for the expansion of current planning policy to support Gypsy travellers and a call for additional efforts to liaise directly with the Gypsy traveller community to ensure any strategy is fit for their purpose.

Promote an infrastructure-first approach to community development

It is crucial that the services and facilities we use on a day to day basis are fairly, easily and affordably accessed. A wide range of facilities are required to support our wellbeing including health services, transport, accommodation and support for an ageing population, education, energy networks, water and drainage, digital, community centres, places of worship, cemeteries and crematoria, libraries, retail including local healthier food outlets, markets, pubs, restaurants and cafes, banks, community growing space, green space, play and sports facilities and public toilets. During the passage of the Planning (Scotland) Act 2019, the Scottish Parliament emphasised the importance of planning these services, infrastructure and facilities for communities across Scotland. 20 minute neighbourhoods are a great opportunity to embed where appropriate, an infrastructure first approach to our future places.

NPF4 will help to prioritise the infrastructure investment needed for people to live better, and more locally, in the future. By taking an infrastructure-first approach to planning future

development, we will be able to reduce the need to travel and minimise spend on additional transport infrastructure construction, contributing to an overall reduction in emissions from the transport sector. We will link with infrastructure plans to encourage place-based investment in local infrastructure to work alongside planned future housing developments. We will reflect and embed travel and investment hierarchies as set out in the Infrastructure Investment Plan and National Transport Strategy 2 within the appraisal and assessment of potential development options to inform the spatial strategy from the outset.

We will also explore the types of community services that will be required in the future, such as hubs for remote working and shared facilities, co-location and future-proofing. Natural (blue and green) infrastructure will be an integral part of a strategy for people, rather than an afterthought, helping to achieve multiple benefits for nature, communities and businesses.

The detailed consideration of infrastructure and service provision and implications are central to the preparation of spatial strategies and future land use decisions. Development plans can help to ensure the right infrastructure and services are in place at the right time to serve the needs of communities. We expect that the new requirement for an evidence report, examined through a 'gatecheck' early in the plan preparation process, will help to achieve this.

As part of the ongoing planning reform programme, we are carrying out a review of existing developer contributions mechanisms such as planning obligations. This was one of the recommendations made last year by the Scottish Land Commission in their advice to Scottish Ministers on land value uplift capture. The review will evaluate the effectiveness of planning obligations as a means of securing timely contributions to – and delivery of – the infrastructure and affordable housing that are necessary to create high quality places. This will help to inform NPF4's approach to infrastructure funding and delivery. We will also align with our Capital Investment Plan in terms of the role of private capital in developing sites of strategic importance to Scotland.

Around 75 respondents made a comment about promoting an infrastructure-first approach to community development, with many of these respondents making a broad statement of support. However, it was also suggested that the approach needs to be more clearly defined.

Other issues raised included that:

- The National infrastructure Delivery Plan is fundamental to achieving greater certainty and investor confidence.
- The infrastructure requirements set should be transparent, proportionate and viable. The ability to set out clearer requirements for infrastructure delivery will require additional capacity and training within local authorities and robust guidance on how it is to be delivered.

A number of the comments addressed the relationship between an infrastructure - first approach and communities. They included that:

- Further information about how the views of communities will be given more weight would be welcome.

- Community ownership should have a substantive part in NPF4's approach to infrastructure funding and delivery.

20 minute neighbourhoods and community services

A number of the comments addressed the infrastructure-related implications of 20 minute neighbourhoods, both in terms of the range of services required and the implications for travel, and particularly active-travel related infrastructure.

While respondents sometimes agreed that 20 minute neighbourhoods can offer an opportunity to embed an infrastructure-first approach to our future places, there was a call for clarity in terms of how this will be applied through policy and guidance. It was noted that some of the infrastructure essential for 20 minute neighbourhoods will be delivered by the private sector, and it was suggested that any plans need to clarify the delivery mechanism for these services.

In terms of the importance of those community services, it was suggested that referring to the approach as 'Infrastructure and Services first' would be helpful.

A number of respondents noted that COVID-19 has brought the need for more localised facilities and amenities into sharp focus, including in terms of helping to promote physical and mental health. It was noted that policy that may previously have been very much framed in relation to reducing emissions, such as reducing the need to travel, is also very clearly linked to helping to build community resilience and wellbeing. The ability to work from home or close to home was cited as an example, with the relationship to digital infrastructure noted. (Digital connectivity is discussed further at Question 3).

In terms of other infrastructure requirements, and particularly community facilities or services that will be required, comments and suggestions included:

- Community and employment remote working hubs and shared office spaces.
- Hubs for the sharing of resources, community transport schemes and charging hubs for electric vehicles.
- Spaces to undertake community activities such as community halls, gardens, parks and centres.
- Culture and heritage facilities (beyond libraries).

Respondents also highlighted some of the challenges to taking an infrastructure-first, 20 minute neighbourhood focused approach, including that caution needs to be applied in a rural context as the level of services provided in remote rural areas necessarily cover much wider geographies, not just in terms of distance but also time. The critical importance of good digital infrastructure, particularly for remote rural and island communities, was highlighted.

Housing development

It was suggested that an infrastructure-first approach, with a proactive approach to providing land for homes and jobs is essential. It was suggested that detailed

consideration of infrastructure and service provision should be central considerations for future land use decisions and development plans; there was support for ensuring that place-based investment in local infrastructure works alongside planned future housing developments, and it was suggested that a long term vision should place individual development proposals within a wider context.

There was interest in the new requirement for an evidence report, examined through a 'gatecheck' early in the development plan preparation process. However, there was a query about how this would help ensure the right infrastructure and services are in place at the right time to serve the needs of communities.

There was a particular note of caution that a meaningful 'gatecheck' will be very difficult to achieve unless there is a statutory alignment of how money is invested in infrastructure. This was described as an issue of timing and it was suggested that a system of front ended strategic investment in new infrastructure capacity is needed, so that development can be brought forward in a planned and strategic manner following that investment, rather than a piecemeal approach.

Other suggestions relating to how the infrastructure-first approach should work alongside housing development included that core infrastructure requirements should be programmed and aligned with the pace and phasing of development.

As at a number of other themes, the particular challenges of developing and delivering an infrastructure-first approach in a rural context were highlighted. For example, it was observed that, in a remote rural context, there may be very little if any spare capacity – meaning that new development will require new or upgraded infrastructure. At the same time there may be little or no mainstream speculative housing delivery, with the only significant new build supply coming from Registered Social Landlord (RSL) development. As a result, the costs of any new infrastructure required needs to be covered from the public purse and it is planning of this spend in a forward manner, plus inclusion of these costs within the accepted costs of RSL housing delivery grants, that is required. In relation to developer contributions (discussed below), there will be no significant if any cross subsidy from private sector.

It was also noted that in areas where the majority of housing developments are small-scale or single property windfall developments, developer contributions are not sought. These issues were sometimes connected to the review of developer contributions (discussed below) and how benefits can be obtained and delivered in rural areas where RSLs are the only volume house builder.

Developer Contributions

The most-frequently raised theme was in relation to developer contributions, and specifically the Position Statement's reference to a review of existing developer contributions mechanisms such as planning obligations. The reference to the review, including looking at securing timely contributions to and delivery of infrastructure and affordable housing was often noted and generally welcomed. Other comments included that further detail on the review would be welcome.

Comments on the existing approach, and specifically section 75 agreements, included that they are a well-established mechanism for securing appropriate developer contributions but that their use needs to be more:

- Consistent, better aligned to policy and case law and less time consuming and unpredictable.
- Alive to the significant viability pressures that can arise from unpredictable and disproportionate developer contribution 'asks'.

A number of the comments went on to focus on how the planning obligations approach should be structured going forward. It was noted that a wide range of facilities are required to support new housing development and that the Position Statement refers to a number of these. One perspective was that it will not be reasonable for housing developments to cross-subsidise all of these services and a clear assessment will need to be made in relation to how these will be funded on an equitable and fair basis in line with policies, circulars and guidance on planning obligations.

It was suggested that a clear approach to developer contributions will be important in ensuring consistency across Scotland, although it was also suggested that planning obligations are a vital element in delivery of local infrastructure needs and should not be centralised.

Suggestions for how any overall approach should be framed included that the Scottish Government should recognise that wider investment in infrastructure and services is required and that local authorities must be better supported in using their powers proactively to front-fund and deliver infrastructure. It was also suggested that any approach should also align with the Capital Investment Plan in terms of the role of private capital in developing sites of strategic importance to Scotland.

Further comments included that:

- The Scottish Government could provide a clear and transparent methodology at the national level for quantifying contributions, for example in areas such as education provision.
- Consideration could be given to reducing the options for non and deferred payment of contributions.

With specific reference to looking at land value uplift capture, comments included that a significant proportion of the uplift in land value from major public infrastructure works should be made available to local authorities to invest in infrastructure and public services. However, it was also suggested that the idea of land value capture does not sit well with developer contributions. The concern was that there would be very little incentive for selling land for development, and limited inclination for developing and improving. Land value sharing, carried out through negotiation and recognition of the part which is played by landowners, developers, local communities, and local authorities, was described as a more realistic approach.

Other issues

Waste: A number of comments were made about the infrastructure for waste, including in the context of an infrastructure-first approach. They included that:

- Waste management infrastructure is not only a fundamental part of Scotland's economy in its own right but, at the very least, plays a vital role supporting the delivery of new housing, not only in processing of waste during its construction but also once it is occupied. NPF4 should help prioritise the waste and recycling infrastructure needed in planning for resilient communities.
- Some waste materials cannot at present be managed within 20 minutes of a neighbourhood or community; for example clinical waste or unavoidable food waste must travel further to be treated and this makes both environmental and economic sense.

Heat: Large scale development - both domestic and commercial or industrial - can provide an 'anchor' for major heat loads. As a source of major and reliable heat load, such developments would help mitigate the costs of installing a heat network which, once in place, would likely provide a more attractive prospect for other, smaller developments within the vicinity to connect to the network. NPF4 might therefore offer some steer on the criteria of an energy masterplan, and how those criteria would be enforced by local authorities.

Sustainable travel: Achieving more sustainable travel is discussed further below, but some respondents also raised the issue in relation to an infrastructure-first approach, and the reference to helping to "minimise spend on additional transport infrastructure construction".

In addition to welcoming the approach, comments included that it is vital that new developments are designed around sustainable and active travel infrastructure at the outset and that the planned approach will only be realised if there is more sophisticated, joined-up working between different agencies of government at a strategic level, and between different local authority actors at the local level. Clarification was sought about whether minimising spending on additional transport infrastructure construction applies to all transport infrastructure or to those elements whose externalities would not aid in reducing emissions from the wider transport sector.

Nature-based and blue/green infrastructure: This theme is also discussed in its own right below, but at a broader level it was suggested that an infrastructure-first approach represents a good opportunity to embed a nature-based solutions approach towards new installations at both a network and local level. The statement that "Natural (blue and green) infrastructure will be an integral part of a strategy for people, rather than an afterthought" was welcomed but it was suggested this could be further strengthened by ensuring it is defined and included in the definition of an infrastructure-first approach.

Enhance and expand natural infrastructure

Our strategy will enhance and promote open and green spaces and green networks as an integral part of successful place-making. By bringing together green and blue infrastructure, we will modernise our existing policies to ensure that our natural networks are nurtured and expanded to support our health and wellbeing, and contribute to our climate and biodiversity goals. We are aiming to strengthen our policy so that blue and green infrastructure are not an added benefit but an integrated requirement for future planning and development. For example, there is scope for new policies for planning green spaces and play. We also expect that much can be learned from innovation in green infrastructure planning as demonstrated by the Glasgow and Clyde Valley Green Network Partnership and Central Scotland Green Network.

Blue and green infrastructure will be an essential part of our approach to building our long term resilience to climate change and can also contribute to reducing emissions and carbon sequestration. In particular, opportunities for natural infrastructure to address the long term risk of flooding, water and drainage issues, temperature management and everyday livability of places will inform our approach to planning and enhancing our spaces and places. As part of this, consideration will also be given to the integration of ecological networks to protect and restore biodiversity and ensure that habitats and species can adapt to a changing climate

Around 35 respondents made comments about enhancing and expanding natural infrastructure. A number of respondents either noted the importance of natural (blue and green) infrastructure and its contribution to resilient communities or welcomed it being a focus on the Position Statement and NPF4. The recognition that the management and maintenance of natural infrastructure is essential was also welcomed.

A number of comments went on to address how the strategic and policy framework for planning can ensure that blue and green networks support good placemaking and contribute to delivering climate change goals. Suggestions included:

- Defining what is covered by natural infrastructure and including it within the definition of an infrastructure-first approach. All key terms should be clearly defined and described to avoid confusion and to reduce the chances of 'under delivery'.
- Requiring all local authorities to undertake an Ecological Coherence Plan to be used to inform decisions on green and blue infrastructure investment.
- Opportunity mapping under a Scottish Nature Network to help indicate key investments in green and blue infrastructure that could give greatest benefits to local communities.
- Building on existing local green infrastructure guidance. There was reference to local guidance which embraces the idea of 20 minute neighbourhoods and ensures that, as well as maximising active travel opportunities, we maximise opportunities for green infrastructure.
- Introducing statutory standards at a national level which ensure a future-proofed provision of local parks and green spaces. There was a connected

concern that if green space is not required at a statutory level, it is vulnerable to a lack of investment.

- Developing a benchmark threshold of protected spaces for all local authorities to achieve as part of their Open Space Strategies and Play Sufficiency Assessments, and more rigorous signposting to existing guidance that is well established and widely used.

Enhancing nature networks

There was support for nurturing and expanding natural networks, with greenspace described as critical social and physical infrastructure that provides essential services to people and the environment. As at other themes, some respondents noted how the COVID-19 pandemic has shone a light on the health and wellbeing benefits of having access to good quality greenspace, but also on spatial inequalities across the country.

In terms of the creation and augmentation of natural networks, one perspective was that this should be a requirement of all new developments of a certain type and scale. A different perspective was that provision or maintenance of green or blue spaces should be encouraged and facilitated within appropriate developments, but that there should not be a 'blanket' approach to requirements, as these will differ, depending on the location of developments.

However, it was also noted that not all blue/green infrastructure is natural and that existing features including heritage assets can form part of blue/green infrastructure. It was suggested that the protections brought in through historic environment legislation have played a part in ensuring this infrastructure – such as the canal network, gardens and designed landscapes and historic battlefields - continues to deliver multiple benefits.

There was also a call for the development of a Scottish Nature Network. It was suggested that a piecemeal approach to the delivery of green and blue infrastructure and the protection and development of natural habitats does not allow Scotland to efficiently tackle the twin crises of biodiversity loss and climate change. A national approach could achieve a strategic network of natural and/or semi-natural habitats that can help to protect, enhance and restore nature, which in turn provide multiple benefits for people and climate. The approach could include the identification of suitable areas for nature-based solutions such as tree planting, peatland restoration, flood risk management, coastal management and natural flood management measures.

Flooding, drainage and water resilience

Other comments reflected some of the themes covered above in relation to creating resilient communities and included that blue/green infrastructure has a key role to play in natural flood risk management and flood prevention. Further comments and suggestions included that:

- In setting requirements for sustainable drainage systems (SuDS), policy should specify fully integrated, above/over ground solutions where possible in order to deliver maximum benefits; this approach also fits with the infrastructure-first approach principles.
- Any policy on SuDS requirements should be supported by illustrative designed guidance that also specifies the requirements and arrangements for management and maintenance.
- There should be a much greater focus on the role that smaller developments have to play, including cumulatively.
- Where possible, flood management needs to be supported by national and local funding to also encourage retrofit projects.

There was also reference to the Scottish Government's Policy Framework on Water-Resilient Places, and it was noted that recommendations in the framework include a blue/green infrastructure-first approach in placemaking and master-planning. It was noted that this extends to new developments and retrofitting.

Achieve more sustainable travel

We will refocus our existing transport policies to specifically draw out how land use planning can build in sustainable travel choices. Scotland's second National Transport Strategy set out a vision for a sustainable, inclusive, safe and accessible transport system, helping to deliver a healthier, fairer and more prosperous Scotland for communities, businesses and visitors. NPF4 is being prepared alongside the second Strategic Transport Projects Review and we expect, in time, that future Regional Spatial Strategies will align with Regional Transport Strategies. The Active Scotland Delivery Plan; the 2030 Vision for Active Travel; and the Active Travel Framework also provide an important policy framework for NPF4 to align with.

By guiding development to the right locations, we can reduce the need to travel unsustainably. To achieve stronger local communities and reduce emissions that are harmful to the environment and our health, and in line with the NTS2 sustainable travel hierarchy, there will need to continue to be a sustained and significant shift away from use of the private car towards walking, wheeling, cycling, public transport, taxis and shared transport. This will need to be embedded in the land use decision making process and will require policies that can be directly and consistently applied, to avoid compromising on our climate change and health objectives.

Around 35 respondents made a specific comment about achieving more sustainable travel, albeit that sustainable travel solutions, and promoting active travel, were often referenced at other themes. The focus on achieving more sustainable travel was welcomed, including refocusing policies to draw out how land use planning can build in sustainable travel choices. However, it was also noted that the principle of integrating land use and transport planning and reducing the need to travel have been embedded in transport and planning policy for a number of years. It was suggested that there needs to be a strengthening of the intent and definition around the principles set out.

There were also a number of references to the importance of NPF4 aligning with the NTS2 and the key role of NTS2 in providing the right infrastructure in the right place at the right time if the infrastructure-first approach is to be delivered. There were also references to the second Strategic Transport Projects Review (STPR2), the 2030 Vision for Active Travel and Active Travel Framework and the Capital Investment Plan.

In terms of the importance of transport infrastructure, comments included that to be considered resilient, a community needs to have a range of travel options which meets its needs. Suggestions as to how this can be achieved included:

- Re-empowering and properly resourcing regional transport authorities with the ability to plan the whole system of transport around people's needs, integrating different modes of transport, with integrated ticketing and price caps.
- Prioritising development in locations which have access to existing public transport networks, or improved infrastructure through the STPR2, will ensure onward journeys to/from those developments can be taken by either active travel or public transport ahead of car travel. This would be in line with the sustainable travel hierarchy.
- Building in sustainable travel choices to new development is essential to address inequalities and reduce transport emissions. With specific reference to bus travel, it was reported that although developer contributions can support bus service provision for an initial period, they do not ensure long term sustainability of service provision, nor the delivery of an integrated network of travel choices. It was suggested that this needs to be addressed if sustainable and well-connected places are going to be achieved.

A number of other comments also addressed active travel and included support for the Position Statement's focus on its importance. The multiple benefits that active travel can bring to local communities, including improved health and wellbeing, reduced inequalities and benefits for national emissions and local air quality, were all noted. It was also observed that, although active travel is more closely aligned with sustainable transport objectives and the well-being economy, infrastructure for walking, wheeling and cycling as a whole threads through and connects all parts of NPF4. It was also suggested that active travel options have a vital role to play in providing better, safer connections between settlements and within settlements.

In terms of delivering these benefits, suggestions included that:

- A new definition for a 'strategic active travel highway network' that meets the aspirations of the Active Travel Framework and STPR2 should be agreed and included in NPF4 as a National Development.
- National walking and cycling infrastructure, with a path network to be identified, mapped, expanded and promoted as a strategic national infrastructure project, could be transformative.

- Practical and workable solutions need to be promoted for supporting active travel at the local level.
- New housing developments should be required to include the creation of safe, segregated active travel routes into city and town centres and to local services.
- Mobility hubs can provide a sustainable and accessible alternative to private car ownership. Smart ticketing offers and other incentives across a network of hubs can assist social inclusion by helping those less able to afford to pay for their travel and encouraging those on the margins to try what is on offer.
- It is important that work is done to tackle some of the key barriers to children and young people participating in active travel.

As under other themes, some of the particular challenges associated with delivering the right travel infrastructure in rural areas were highlighted. In particular, the tensions in a remote rural context between bringing forward good opportunities for quality homes in places that would benefit from them and development being guided to places which can currently be sustainably accessed was highlighted.

Solutions and options identified included:

- Striking a balance which allows development where it creates a positive impact on biodiversity or where it can be part of an EV charging infrastructure-first approach which helps contribute to net-zero carbon outcomes, for example.
- Isolated rural communities can benefit from mobility hubs to extend the reach of the public transport network, improving accessibility and connectivity.
- The design of networks which promote dedicated cycle routes, and use of electric bikes with appropriate charging opportunities, can play an important role.

A Plan for a Wellbeing Economy

The third key outcome is a Wellbeing Economy. The Position Statement highlighted intentions to: create healthier, fairer and more prosperous places and ensure future development contributes to a green, sustainable, and inclusive economic recovery; identify and support development that works with our assets, key sites and opportunities for strategic investment; take a flexible and enabling approach to future business and employment uses; support development in the parts of Scotland where quality jobs and investment are most needed; and support development that helps to maintain and strengthen strategic transport and digital connectivity.

Further detail on the Plan for a Wellbeing Economy was provided under ten headings:

1. Support a sustainable and green economic recovery
2. Reduce inequality and improve health and wellbeing
3. Provide certainty and flexibility to encourage investment
4. Grow our food and drink sector
5. Support sustainable tourism development
6. Stimulate culture and the creative industries
7. Transition to a circular economy
8. Promote sustainable resource management
9. Secure strategic transport connectivity
10. Improve digital connectivity

Question 3: Do you agree with our current thinking on planning for a wellbeing economy?

General comments

General comments at Question 3 included points about the principle of a wellbeing economy, and how achievable this is likely to be. Some respondents saw 'The Wellbeing Economy' as a poorly defined concept, with reference made to the extent to which understanding of the concept differs across stakeholders (and particularly the general public). It was suggested that a clearer definition of what a wellbeing economy 'looks like', and what it adds to current strategic priorities, is required if the concept is to underpin NPF4. This included a perceived need to explain or justify why the concept is being introduced, and what 'wellbeing' means in relation to the economy.

There was also concern that NPF4 will maintain a focus on economic growth as part of a 'wellbeing economy', and suggestions that continuing economic growth may not be compatible with the key principles of a wellbeing economy – for example improving health and wellbeing, delivering fairer communities and achieving net-zero objectives. Some respondents wished to see NPF4 acknowledge the potential tension between economic growth and delivery of a wellbeing economy and make clear that wellbeing

and environmental objectives should over-ride consideration of economic growth where they are mutually exclusive.

It was also suggested that “healthier, fairer and more prosperous places” have been strategic priorities for the Scottish Government for some time, but that limited progress had been made over this period. These respondents expressed some scepticism around the potential for NPF4 to achieve real change. This also appeared to be connected to concerns raised regarding the financial and resource cost of achieving the outcomes set out in the Position Statement, and a view that significant investment will be required to achieve real change.

There was some concern that policy support may not be sufficient to achieve health/wellbeing and environmental outcomes relating to a wellbeing economy. Some called for the introduction of stronger legislative or policy requirements around reducing the impact of development on communities and environmental quality.

Support a sustainable and green economic recovery

Collaborative spatial planning at a national, regional and local scale, will help us to recover from the impacts of COVID-19 through a sustainable, green economic recovery, as recognised in the 2020 report by the Advisory Group on Economic Recovery. We have an opportunity to actively promote strategically important locations for future investment and business growth as part of a coherent vision for sustainable, inclusive growth.

Our policies on planning for business development will recognise the fundamental role Scotland’s natural capital plays in supporting our economy and will aim to achieve sustainable, inclusive growth by protecting and investing in our natural assets and supporting the health and wellbeing of our communities. This will support Scotland’s ambitions to build a wellbeing economy. Planning can enable sustainable, inclusive growth by attracting investment, sustaining future employment, restoring natural capital and seizing the new economic opportunities created by our transition to a net-zero, circular economy. Our natural assets can play a key role in securing our path to net-zero by 2045 and achieving the long-term vision of our Environment Strategy.

Our strategy will be informed by emerging regional scale spatial and economic strategies which will align with city and regional growth deals and the work of Regional Economic Partnerships. For example, early thinking in Argyll and Bute indicates the significant potential for place-based approaches that unlock the potential for jobs that make use of the area’s natural resources, such as aquaculture. Orkney’s emerging spatial strategy sets out a strong vision for development that capitalises on the area’s exceptional natural energy resources and marine connections, underpinned by an emphasis on innovation and research. Moray is exploring how its natural assets can help to build a place-based approach to future development and investment in key sectors, such as the whisky and outdoor recreation industries. Community wealth building is also being explored at a regional scale, for example in an emerging regional spatial strategy for North, East and South Ayrshire which links with the area’s growth deal and economic strategy and promotes place-based investment. Sustainable tourism is emerging as a key theme for regional spatial strategies to consider, including for the National Parks. Enabling business growth, alongside visitor management and low carbon accessibility are shared themes that can inform a national spatial strategy that will guide us to 2050.

Around 85 respondents commented on supporting a sustainable and green economic recovery in their answer to Question 3.

Many respondents expressed their support for this focus, and the role of NPF4 in supporting the transition to a net-zero, circular economy. There was also support for specific elements of the approach to a sustainable and green recovery as set out by the Position Statement including a spatial strategy targeting investment in areas and sectors where jobs and investment are needed most, and which can help to deliver wider economic and environmental targets. Some respondents suggested more linkages with the 'plan for net-zero emissions'.

There was also specific support for the Position Statement recognising the role of natural capital in supporting a green recovery, community wealth building, and ensuring the wellbeing economy is inclusive of communities across urban and rural areas. Respondents cited multiple examples of local policy and development projects focused on securing a wellbeing economy through a sustainable and green economic recovery, including some where respondents identified a need for support to ensure these developments can contribute fully to NPF4 policy objectives.

However, most of those providing comment on a sustainable and green economic recovery raised concerns or issues they would like to see addressed through NPF4. These are summarised below.

Priorities of a wellbeing economy

Some respondents wished to see further detail on how NPF4 can balance purely economic benefits of development with key aspects of a wellbeing economy such as health and wellbeing, inclusivity and equality. This included suggestion that there remains a tension between the commitment to continuing economic growth and wellbeing economy outcomes as set out by the Position Statement. These respondents suggested that placing wellbeing as the central driver of the economy would require a commitment to removing inequalities and poverty but would not necessarily identify continuing economic growth as a key focus. Indeed, it was suggested that the target of net-zero emissions may not be achievable alongside economic growth. Some called for NPF4 to provide a strong message that development should contribute first to the needs of Scotland's people and environment, before consideration of economic growth.

In contrast, others raised concerns that it is not the right time to prioritise human and ecological wellbeing, and that NPF4 should maintain a focus on sustainable economic growth to support recovery from the COVID-19 pandemic. Respondents referred to the pandemic having contributed to higher levels of ill health, redundancies, unemployment and poverty, and suggested that a strong focus on sustainable economic growth is required to address these issues.

More generally, some respondents also wished to see further detail on how the wellbeing economy will function for Scotland, and how its success will be measured. This included a specific focus on what 'sustainable' means in relation to a green recovery and wellbeing economy, and a view that a new set of success measures are required which focus on health and wellbeing, social justice and reduced inequality. Reference was made in this regard to the National Performance Framework and UN Sustainable Development Goals.

Regional approaches

There was specific support for NPF4 taking a local and regional approach to achieving a green economic recovery. This included suggestions for NPF4 to be aligned with indicative Regional Spatial Strategies, to take account of learning from City and growth deals and, more generally, to ensure a strong role for communities in the development of a wellbeing economy.

However, there were also calls for more detail on how this will work in practice, and how funding and investment will be shared at a regional level to ensure equality across urban and rural regions. This included a suggestion that NPF4 needs to set out a clear policy change to rebalance economic growth across Scotland, to close the gap between the highest and lowest performing regions.

Respondents also expressed support for the examples of local and regional projects cited by the Position Statement in relation to supporting a green recovery. However, some wished to ensure that LPPs and local planning decisions would not add a further barrier to the development required to support a green recovery.

Role of particular sectors

Responses made reference to a range of specific sectors (including from respondents active in these sectors) as having a role to play in a green economic recovery, highlighting the extent to which these contribute to the Scottish economy and/or are aligned with climate change targets. These comments most commonly related to renewable energy and aquaculture/marine development. Respondents also referred to tourism, food and drink, housing development (and particularly affordable housing development), sustainable transport, life sciences, and forestry.

However, others saw a need for NPF4 to ensure that some sectors improve their practices towards a green economy before they receive further support through the planning system.

Skills pipeline

Some respondents argued that NPF4 should address the skills pipeline to ensure the right people are equipped with the right skills to support a green recovery, including reference to specific sectors such as forestry and the historic environment where there was a perceived need for further skills development. The college sector was also seen as having a role in supporting a skills-led economic recovery.

Other issues

Other issues raised included suggestions that:

- The role of the historic environment should be acknowledged alongside Scotland's natural assets in supporting a wellbeing economy and green recovery including, for example, through supporting skilled jobs.

- The robustness of the evidence base available to enable the planning system to support a green recovery is a matter of concern. This included specific reference to limited access to biological data for planning authorities.
- All proposed National Developments should be assessed against a clear set of criteria to ensure they contribute to a green recovery.

Reduce inequality and improve health and wellbeing

A shift from economic growth towards a wellbeing economy provides us with an opportunity to consider how development and investment can help us to address longstanding health and wellbeing inequalities.

Sustainable and inclusive growth will depend on a planned approach to ensure that development happens in locations that provide the greatest benefits for society as a whole. Economic performance and access to employment vary across Scotland and spatial planning has the potential to close the gap between the highest and lowest performing areas by intervening to create opportunities which are accessible to everyone. The spatial strategy will need to consider where we want to target future investment, and the land and premises required to support the sectors that we expect to grow in the future.

We will continue to actively enable investment in sustainable locations across Scotland – both urban and rural – including key investment sites and strategic opportunities for Scotland to attract international investment. Our approach will aim to strengthen the economy of our diverse cities and towns, and enable development that supports a vibrant rural economy. In the past, industrial and business areas have tended to be located at a distance from residential areas. As our economy continues to evolve, there may be scope for greater integration of work and living as inter-related land uses. The climate change agenda may benefit from a strategy that broadens choice and flexibility, for example through the provision of community hubs and flexible workspaces. These types of initiatives could complement other strategies such as revitalising our town and community centres and helping to create footfall that supports local traders.

This strategic approach to future investment and infrastructure will be brought together with our other aims of localism and quality of place to provide a coherent spatial vision for Scotland as a whole. We may need to make choices to ensure that all areas play to their strengths with complementary, rather than competing proposals. Digital infrastructure, remote working and our current re-evaluation of the future working environment are expected to feature in a new approach to planning the distribution of our future jobs.

Around 35 respondents commented on reducing inequality and improving health and wellbeing and there was broad support for NPF4 having a role to play. This included specific support for:

- A focus on delivering jobs in the right sectors and right places.
- Recognising the need for a more inclusive and fairer set of economic growth metrics.
- NPF4 to recognise what is expected to be an increasingly digital future.
- An emphasis on health and wellbeing (including mental health) as key elements of a wellbeing economy.

There was a view that NPF4 provides an opportunity to address negative health and wellbeing impacts in some places, and to create more places which support good

health and wellbeing. A number of specific locations and sectors were referenced as in need of more targeted support and development. The COVID-19 pandemic was also described as having demonstrated an opportunity to redistribute jobs to more remote rural areas as part of a wider strategy to support repopulation of these areas.

It was suggested that NPF4 should require a clear indication of how a development will generate specific community wellbeing and equalities outcomes prior to a planning application decision being made.

Reducing inequalities

Respondents saw a role for NPF4 in ensuring the move to a wellbeing economy is delivered in a fair way. This included suggestions that NPF4 should ensure the framework for economic development is aligned with public health principles and commits to tackling health inequalities, supports economic success measures which value public health and inclusivity, and seeks to ensure that the burden of climate change adaptation and mitigation is borne by those most responsible.

Digital connectivity was seen by some as a key area of inequality, including reference to differences in the quality of digital connectivity across Scotland, and evidence of deprived households being impacted by digital poverty. There was support for NPF4 incorporating the ending of digital poverty and inequality as a key policy priority. However, there was also some concern that support for digital working could amplify existing inequalities, for example if this is at the expense of jobs where digital connectivity is not a viable option. Concern was also raised regarding potential for a shift to more home working to add to house price inflation in rural locations, potentially limiting access to housing for local residents.

Gender was also highlighted as a key measure in relation to current inequality within Scotland's economy and employment. Specific suggestions for NPF4 seeking to address gender inequalities included incorporating analysis of the gender pay gap and women's representation as part of local and national strategic planning.

Focus on health and wellbeing

A range of approaches were suggested to ensure a focus on health and wellbeing across the planning system, including Public Health Scotland being made a statutory consultee, and health impact assessments being introduced alongside Equalities Impact Assessments. It was also suggested that NPF4 should seek to support the creation of places that enable sustainable travel and active lives, as key contributors to health and wellbeing.

Some respondents wished to see NPF4 more clearly acknowledge the importance of mental health as part of a move to a wellbeing economy. This included suggestions for a new framework for strategic investment in mental health services and infrastructure and supporting development which enables mental health benefits such as outdoor access, leisure and recreation.

There was also a suggestion that NPF4 should recognise the potential contribution of green spaces, including green belt, to community health and wellbeing. It was noted that access to green space has been particularly important during the COVID-19

pandemic. Respondents also highlighted the benefits of green space in terms of the wellbeing of communities, and cited evidence that lower income households and Black, Asian and minority ethnic communities are disproportionately impacted by loss of green space. Some wished to see NPF4 provide additional protections for these areas.

Recognition of the contribution of particular sectors to health and wellbeing was also suggested including:

- Culture and the historic environment.
- Food production – via aquaculture and farming on land - by contributing to food security and ensuring access to locally produced food. Reference was also made to UN Sustainable Development Goals as of relevance to a wellbeing economy, including ‘zero hunger’ and ‘good jobs and economic growth’.

Strengthening local economies

There was support for localism in cities and town centres, and development of ‘community hubs’, including suggestions that these could support better community engagement in the planning system. However, it was also suggested that an emphasis on redevelopment of vacant and brownfield land could stifle choice of housing location. Some wished to see NPF4 recognise that self-sufficient places can be achieved within new development in suburban or rural locations. There were also suggestions that NPF4 must recognise that town centres will still play an important role in local economies, in addition to development of town centres as ‘cultural hubs’.

Some respondents wished to see more detail on the types of work and business that are considered suitable for integration with residential spaces, including suggestions that specific criteria should be applied to ensure such integration does not reduce community wellbeing.

There was a perceived need to strengthen the evidence base available to identify the sectors and spaces where development is required. This included reference to gaps in evidence on employment land requirements and business audits.

Provide certainty and flexibility to encourage investment

Planning can stimulate investment and growth by providing certainty. At the same time, recent months have shown that our planning policies must be flexible enough to respond to rapid and significant economic and social change. Whilst many of our existing policies on business and employment remain relevant, we can improve on them so that they reflect our aspirations for a wellbeing economy.

We will consider how this can be supported by local development planning which is underpinned by a stronger evidence base at the local level for local land use decisions. We will review the role of business land audits and consider the extent to which they link with local economic strategies. We will also explore whether the resilience of investment sites would benefit from fuller risk assessments to help business adapt to the impacts of climate change.

Around 20 respondents commented on providing certainty and flexibility to encourage investment. A number of these respondents expressed their support, particularly in the context of supporting the post-COVID economic recovery. It was seen as important that NPF4 strikes the right balance between the certainty of a plan-led system, and the flexibility required to respond to social and economic change.

Respondents also referred to a number of specific sectors seen as having potential to contribute to government objectives, and where there was a perceived need for NPF4 to do more to encourage investment. These included renewable energy, ports, transport infrastructure, aquaculture, and recycling and waste management.

There was also support for other specific points raised by the Position Statement in relation to encouraging investment. These included reviewing the role of business land audits and their links to local economic strategies and attracting investment to support employment across sectors.

Other issues seen as impacting how NPF4 can provide certainty and flexibility to encourage investment are summarised below.

Consistency

There was a call for NPF4 to provide guidance to enable a consistent approach to business land audits and economic strategies. This included consistent methodology for the assessment of employment land requirements and for development of local economic strategies (including forecasting of need and demand, opportunities and threats). These were highlighted as key elements in ensuring a robust local and national evidence base for land use decisions.

Flexibility

Some respondents suggested that robust policy will be required to ensure the planning system effectively supports a wellbeing economy, and that flexibility in the planning system should be grounded in process (rather than policy). MCAs were suggested as a means of providing the necessary flexibility.

There was a perceived need for greater flexibility in the planning system to encourage investment in ports, including suggestions that attracting investment will be essential in enabling ports to contribute to climate change objectives. This included specific suggestions of additional flexibility around employment uses within operational ports and the scale of port development.

Greater flexibility was also suggested with respect to elements of the waste management system, including with respect to waste inputs and to site opening and operational hours.

In contrast, some respondents suggested that flexibility is already built into Scotland's planning system, and that the system is well placed to respond to economic and social change (for example as compared with planning systems based on zoning and fixed legal terms). Nevertheless, the potential value of the additional certainty that a plan-led system can provide for investors was recognised.

Other issues

Other issues raised included calls for:

- Closer alignment of private capital and government funding to deliver infrastructure.
- Specific support for cross-funding of development of serviced employment land or buildings, alongside housing development. It was noted that this would also support delivery of the 20 minute neighbourhood policy set out under 'A Plan for Resilient Communities'. It was also suggested that NPF4 should help to protect viable employment uses, considering options for suitable marketing periods before alternative uses are considered.

Grow our food and drink sector

Planning can support our internationally renowned food and drink sector by protecting our natural assets that underpin production and facilitating the development of production and processing facilities.

This includes fishing and aquaculture, farming, food and beverage manufacturing. It is significant for employment in the islands and accounts for a high proportion of employment across rural Scotland. Our current policies recognise the importance of high quality agricultural land but there is scope to more fully reflect the importance of land as a finite resource that delivers many benefits for society. Wider policies will inform our approach. For example, the Land Use Strategy sets out that where land is highly suitable for a primary use this should be recognised in decision making so that multiple benefits can be secured. Links with our rural policies, flood management, water catchment management and carbon storage will also be important.

We will look to enable the sustainable growth of the finfish and shellfish sectors, including by guiding new development to coastal locations that reflect industry needs and take into account wider marine planning. Scottish aquaculture and its wider supply chain is of particular significance for some of our most remote rural communities. Farmed salmon has one of the lowest carbon footprints by production of health protein foods. The industry's growth strategy for 2030 aims to double the economic contribution of the sector to £3.6 billion and double the sector's jobs to 18,000. The Scottish Government continues to work with the Aquaculture Industry Leadership Group to achieve this.

Around 30 respondents commented on growing our food and drink sector. Some respondents expressed their support for the priority assigned to growing Scotland's food and drink sector. This included a focus on the economic significance of the sector, particularly for rural and island communities, and reference to the role of aquaculture in the Scottish Government's Economic Recovery Implementation Plan. Support for the Position Statement also included reference to evidence indicating that salmon farming has accounted for the majority of the food and drink sector's economic impact. Specific opportunities for further growth in Scotland's food and drink sector were also cited.

It was noted that the Position Statement does not provide a definition of the term 'high quality agricultural land', and that 'prime agricultural land' is a long-established and clearly defined term. Some respondents argued NPF4 should provide stronger

protection for prime agricultural land, for example by removing the current permission for development which is 'essential as a component of the settlement strategy'.

There was also an objection to the distinction between aquaculture and land farming made in the Position Statement, and a suggestion that NPF4 should provide stronger support for development of the latter alongside aquaculture. It was also suggested that NPF4 should reference opportunities for community growing and green spaces to support a local food system.

In relation to integration of planning and land use, it was suggested that a Scottish Nature Network could provide a means of co-ordinating action to support a green recovery.

Aquaculture

Some respondents raised concerns about proposed support for the aquaculture sector and the reference to salmon farming having 'one of the lowest carbon footprints by production of healthy protein foods'. These respondents cited what was described as 'growing evidence' of the adverse impact of salmon farms, particularly in sensitive marine environments. There was a perceived role for NPF4 in ensuring that growth in the aquaculture sector is not to the detriment of surrounding seafloor and wildlife. This included particular concern regarding development of salmon farms within Marine Protected Areas, with some suggesting that further salmon farm development should be discouraged or prohibited in these areas. Some also saw a need for review of existing and planned salmon farms to assess and mitigate adverse environmental impacts, and to identify suitable and unsuitable locations, before further salmon farming development is supported by NPF4.

However, others suggested that the aquaculture sector has been changing rapidly in recent years and wished to ensure that NPF4 is based on an accurate picture of the sector and its current environmental impact. The extent to which sustainable growth in the aquaculture industry is important in tackling the challenges facing rural and island communities was also highlighted. This included reference to diversifying rural economies, helping to reverse population decline, and supporting local infrastructure.

It was also suggested that NPF4 could include provision for potential new aquaculture sectors such as seaweed harvesting, bivalve shellfish and algae production.

Assessing proposals

Several respondents noted the reference to 'criteria for assessing aquaculture proposals' in the potential policy changes relating to the food and drink sector. Some wished to see further detail, with suggestions that the criteria should reflect other relevant policy and guidelines (such as National Marine Plan Interactive (NMPi) Good Environmental Status characteristics) and the most recent developments in marine research and evidence. Respondents also provided detailed suggestions regarding the areas they would like the criteria to address including guidelines on aquaculture waste, seabed condition, water quality, incorporating risk-based spatial tools, and net servicing/changes. It was also suggested that NPF4 should include detail on the role of SEPA and/or Marine Scotland in assessing proposals against these criteria.

Some comments regarding the assessment of aquaculture proposals appeared to reflect the respondent's wider view that NPF4 requires more detail on how the planning system can strike a balance between supporting economic growth and ensuring environmental and economic sustainability of the food and drink sector. The World Bank principles were referenced here. Some were of the view that the Position Statement places greater emphasis on 'growth' rather than 'sustainability', and there were calls for NPF4 to include stronger protections to ensure development is sustainable and meets environmental protection standards.

Some respondents expressed support for NPF4 being informed by RSSs and regional economic strategies, including examples of this approach already being taken forward by planning authorities. Regional Marine Plans (RMPs) were noted by some as a means of managing aquaculture development, and of ensuring that the cumulative impacts of development are considered alongside conservation objectives. It was suggested that all aquaculture, including salmon farms, should be integrated into RMPs.

It was also suggested that:

- In relation to the spatial approach to salmon farming and other aquaculture development, NPF4 should reflect the recommendations of the Salmon Interactions Working Group regarding development control for salmon farms and NMPi guidelines.
- A distinction should be made between open-cage and other forms of salmon farming. It was suggested that if open-cage farming is deemed unsuitable in a specific location there may still be scope for use of other technologies (such as semi-closed or closed cage farming, or vertical ocean farming) to reduce or remove environmental impacts.

Support sustainable tourism development

Our strategy and supporting policies will include a renewed focus on enabling sustainable development that helps to strengthen and grow our tourism sector. Tourism plays a major role in our economy – in 2018, spending by overnight tourists and day visitors in Scotland was around £10.4 billion. This generated around £12 billion of economic activity in the wider Scottish economy and contributed around £7 billion to Scottish GDP.

The Sector also employed 218,000 people accounting for 1 in 12 jobs in Scotland. The sector has been significantly impacted by the pandemic. The Scottish Tourism Emergency Recovery Group, and now the Tourism Recovery Taskforce has provided a partnership-driven response. The Taskforce report focuses on recovery, investment and stimulating demand. Whilst overall levels of employment in Scottish tourism are highest in Edinburgh and Glasgow, as a proportion of all jobs tourism is of particular significance in rural areas such as Argyll and Bute and Highland. Tourism will have to continue to adapt to further influences including climate change and its impact on travel, and the economic challenges ahead. NPF4 will reflect the priorities set out in our Tourism Strategy.

Our many great places and exceptional natural environment, landscapes and wildlife are assets that the sector depends on, and so a sustainable, planned approach to future development will help to ensure the long term future of the industry. Destinations such as island and rural locations often have a 'carrying capacity' that is placed under threat by the influx of large tourism numbers. Consequent impacts on the environment and communities

have to be managed, through visitor management facilities, investment in appropriate infrastructure or by striking the right balance between tourism accommodation and maintaining an adequate housing supply to support and retain the existing population. Temporary accommodation for the sector's workforce in rural areas is often a challenge that can be addressed by positive planning policies.

Around 35 respondents commented on supporting sustainable tourism development. Many of these respondents expressed their support for the focus on enabling sustainable tourism development and the commitment to build on investment through the Rural Tourism Infrastructure Fund. The economic significance of tourism at a national and regional level was noted, with references to a particular need to support recovery following the COVID-19 pandemic. Respondents also expressed specific support for the need to strike a balance between providing the infrastructure required to support tourism, while protecting the interests of local communities and minimising environmental impacts.

Supporting sustainable approaches

There was a suggestion that greater clarity is required on what 'sustainable' means in the context of NPF4 supporting tourism. This included specific suggestions that NPF4 should make reference to climate resilience and net-zero emissions, in addition to economic sustainability.

Some respondents highlighted the extent to which the approach to sustainable tourism development will need to be tailored at a local and regional level, recognising the uneven distribution of tourism attractions and infrastructure. Some discussed opportunities for sustainable development to support growth in tourism activity, including in terms of specific locations/developments and/or key tourism sectors.

However, other respondents referenced locations where it was felt that the focus should be on making existing tourism more sustainable and inclusive, rather than seeking further growth in overall tourism activity. It was also suggested that NPF4 should recognise links between sustainable tourism and other policy areas such as cycling and active travel, the food and drink sector rural businesses, and climate change targets (including a suggestion that a reduction in international travel and increase in 'eco-tourism' could provide opportunities for growth in tourism in Scotland).

There was support for the proposed link between NPF4 and the Tourism Strategy, although it was suggested that the degree of regulatory and economic flux in the tourism sector would mean that the strategic approach will need to be reviewed over time. It was also suggested that NPF4 should link with regional strategies to ensure the approach to sustainable tourism development takes account of regional needs and opportunities.

There were calls for NPF4 to set out clearer policies that recognise the economic importance of tourism in enabling recovery from the impact of the COVID-19 pandemic and supporting development that improves environmental and landscape quality. It was suggested that this should include developments to expand existing tourism accommodation and infrastructure, as a platform for future growth.

Tackling adverse impacts

The importance of striking the right balance between promoting places as tourist destinations and ensuring the wellbeing of the settled community was highlighted. This included a particular focus on the impact of short-term lets on housing supply with some respondents calling for a review of existing legislation and policy around tourism accommodation. Specific examples of tourism development were also cited which were perceived to have been at the expense of the wellbeing of an existing community.

Respondents also cited several examples of local approaches to tackle adverse impacts of tourism on communities, but there was a view that a national policy framework and guidance is needed from NPF4 to inform local approaches.

Stimulate culture and the creative industries

We will recognise the importance of creativity, culture and the arts to our collective identity and future places. Culture defines our diverse places and many of our buildings reflect our architectural, social and economic history that contributes to part of our sense of wellbeing, heritage and economy. Regeneration and development has used culture and creativity to inspire new futures, from Dundee Waterfront where the V&A has helped to transform the city centre, to Paisley where creativity has been used to stimulate a new future for the area. Despite this, culture has not featured prominently in our suite of national planning policies to date and there is significant scope to improve on this in NPF4.

Scotland's Culture Strategy sets out a vision for strengthening and transforming culture, and using it to empower communities as well as individual lives. The strategy aims to ensure that culture is embedded into all policies, so that its transformative potential can be fully realised. It outlines the significance of the creative industries as our second fastest growing sector that accounts for 3.3% of employment in Scotland and is made up of numerous small businesses.

Around 15 respondents commented on stimulating culture and the creative industries. There was support for a stronger focus on culture and the creative industries. This included a particular focus on the potential contribution of these industries to health and wellbeing and as a significant economic sector, with potential to support regeneration of deprived areas. Some respondents also expressed a view that a wellbeing economy requires a stronger role for communities, for example through community businesses and social enterprises. Local examples were provided of policy seeking to support cultural and creative industries.

Respondents also expressed support for the reference to protection of existing cultural assets and the importance of ensuring clear links between NPF4 and A Culture Strategy for Scotland. This included comments noting that the Culture Strategy includes the historic environment as a key element of Scotland's cultural assets, with some wishing to see more explicit recognition of the historic environment within NPF4. The role of archaeology in the planning system was also highlighted as helping to preserve Scotland's cultural heritage.

However, while no respondents expressed disagreement with support for culture and the creative industries, some felt that NPF4 needs to provide a more detailed framework setting out how the planning system can achieve this, with guidance for developers, investors and planning authorities. Issues raised included that:

- There should be a stronger emphasis on the role of community-led approaches to stimulating culture and creative industries, and in supporting the wider shift to a wellbeing economy.
- NPF4 should include the specific aims of the Culture Strategy.
- A stronger emphasis is required in relation to cultural heritage assets and archaeology, including a requirement for clearer policy and guidance.
- Culture could be a key thread running through NPF4 and in planning across Scotland.

Transition to a circular economy

We will update our policies on zero waste to reflect the new opportunities arising from a shift towards a circular economy. Planning can support development which reflects the waste hierarchy, prioritising the reduction and re-use of materials, and facilitate the delivery of new infrastructure required to achieve this. Our policy on this was updated in 2016 and the Climate Change Plan and emissions reduction targets are relevant, together with the more detailed policies including the forthcoming ban on landfilling of biodegradable municipal waste. At a European level, the European Commission also launched a Circular Economy Action Plan in March 2020, which aims to mainstream and support action in this area, including in relation to buildings and construction.

Minimising construction waste and promoting the sustainable use of the existing built environment has an important role to play as part of this. Infrastructure to support the circular economy, including for collecting, sorting, processing and re-manufacturing materials, that can help reduce the demand on primary sources of materials, will also need to be considered. This might take the form of increasing capacity at existing sites or the provision of new sites and there will be choices to be made on opportunities for example for co-location of facilities.

Around 30 respondents commented on transitioning to a circular economy. Reference to the circular economy within the Position Statement was welcomed, with responses emphasising the importance of a transition to a circular economy including for wider climate change policy priorities and to support economic recovery. The role of the circular economy was also highlighted specifically in relation to the forthcoming ban on biodegradable landfill. There was also support for recognition of a role for the existing built environment and of opportunities for existing and new economic sectors to respond to the transition to a zero carbon Scotland. The effect of the COVID-19 pandemic in hampering progress on elements of the circular economy (for example through reintroduction of single use plastics) was noted and it was argued NPF4 should seek to protect and build on progress made prior to the pandemic.

Some respondents wished to see more clarity on the specific policy direction, including detailed policy objectives and targets, in relation to the circular economy. In this context, it was noted that the delayed Circular Economy Bill could offer additional clarity.

In terms of specific aspects of the circular economy, there were calls for greater detail on the role of waste management particularly in respect of:

- The infrastructure required to support the transition to a circular economy, both reflecting the ‘waste hierarchy’ and minimising exporting of Scotland’s waste.
- Greater clarity on how NPF4 will promote sustainable use of the existing built environment.
- Earlier involvement of the resources and waste sector in the planning process as part of a ‘whole systems approach’.
- A clear policy on the role of various waste disposal methods in response to the forthcoming ban on biodegradable landfill.

Respondents offered a range of views on the potential role of incineration in response to the ban on biodegradable landfill. These included suggestions that increased use of incineration would not be consistent with the commitment to the waste hierarchy and reference to alternatives seen as more consistent with the overall objectives of the Position Statement. Some respondents also expressed concern around the extent to which support for energy from waste development is compatible with a circular economy and net-zero targets, although others suggested that appropriately designed developments can have a positive role to play in relation to climate change targets.

It was also suggested that there will continue to be a requirement for landfill provision for non-recyclable and non-combustible waste, and that proposals which meet wider sustainability and climate changes objectives should be supported.

Other points on transition to a circular economy included that:

- NPF4 should support a circular approach to the built environment. This included calls for detail on how NPF4 will seek to minimise construction waste, and proposed policies to support a ‘whole life approach’ to development.
- There should be more detail on the role of LDPs to support the transition to a circular economy.
- Greater emphasis should be placed on ‘repair and reuse’, and the additional infrastructure required to support this element of the waste hierarchy. There was a perception that support for the circular economy has been too heavily focused on recycling, and a view that NPF4 should encourage a greater focus on repair and reuse, particularly in relation to ‘high impact material streams’.
- Reference to the circular economy could be expanded to include the sharing economy, for example to support co-working spaces and sharing of vehicles and equipment.

It was also noted that the list of suggested National Developments does not appear to include any circular economy projects.

Promote sustainable resource management

Our spatial strategy and supporting policies will continue to set out proposals and policies that safeguard workable mineral resources whilst ensuring demand for primary materials, where required, can be met in a safe and acceptable way, including continuing to safeguard

air quality. The substantial decline in the demand for coal for energy production, suggests there is also an opportunity to review our policy approach for this sector.

Peatland also has a critical role to play as a nature-based solution in supporting our climate change targets as well as providing many other long term benefits, and so our strategy and policies will help support both the phasing out of the use of horticultural peat and our investment in the restoration of peatlands. We will also consider how we can restrict further development on peatland given its role in carbon sequestration.

We have already committed to including our policy position on unconventional oil and gas in our draft NPF4. This is currently contained in a Statement of 3 October 2019 and sets out that the Scottish Government does not support the development of unconventional oil and gas in Scotland. This means development connected to the onshore exploration, appraisal or production of coal bed methane or shale oil or shale gas using unconventional oil and gas extraction techniques, including hydraulic fracturing and dewatering for coal bed methane.

Around 20 respondents commented on promoting sustainable resource management.

In relation to peatland, there was support for the reference to preservation and restoration, and in particular the proposed restriction of further development on peatland to ensure its role in carbon sequestration. This included calls for more detailed guidelines and tools to enable planning authorities to control operations and development on peatland and reference to existing guidance or codes that could inform NPF4. It was also noted that the Climate Change Plan includes specific targets for peatland restoration and it was suggested that these should be reflected by NPF4.

Respondents also highlighted potential tensions between preservation of peatland and other aspects of NPF4, including concerns around a 'blanket ban' on development on peatland. These included reference to:

- The continuing use of peat in some industry sectors.
- The extent to which an outright ban on development on peatland could severely limit development activity in some parts of Scotland.
- Balancing the net carbon benefits of renewable energy development with potential impact on peatland.

There were calls for NPF4 to set out a clear policy framework for how planning authorities should weigh the relative benefits of peatland preservation against renewable energy or other developments that can offer net carbon benefits.

It was also suggested that further detail is required regarding management of other finite resources such as conventional oil and gas which are still used across the transport, energy and other sectors. There was a perceived need for NPF4 to include a clear strategy for sustainable minerals supply. This included a suggested role for community participation and ownership in promoting more sustainable resource management. Reference was made to the importance of a sound evidence base to support the Scottish Government's strategy for mineral resource management, including citation of specific data sources.

There was also support for the proposed review of the Scottish Government's policy approach for coal for energy production. This included respondents noting that any

fossil fuel development approved during NPF4 would still be in operation by the target date for Scotland to reach net-zero emissions. It was noted that coal is no longer being mined in Scotland, and that LDP requirements should be updated to reflect this.

There was support for the Position Statement's reference to the current moratorium on unconventional onshore oil and gas extraction, and a suggestion that NPF4 should clarify the Scottish Government's position.

Secure strategic transport connectivity

Our spatial strategy will work with, and plan for, our future strategic transport network. Connectivity, physical and virtual, is essential for inclusive growth. National Planning Framework 3 identifies key connections including airports, high speed rail, long distance walking and cycling routes and some freight facilities as national developments. The National Transport Strategy and Scotland's Economic Strategy recognise the importance of strategic transport connections, links and gateways. Brexit will heighten the importance of connectivity with external markets in the future.

Our new strategy will inform, and be informed by, the second Strategic Transport Projects Review, identifying key transport hubs and intermodal nodes that support connections within Scotland and with the wider world. We recognise the importance of long-term strategic road, rail, air and sea networks and will consider their role in relation to health and quality of life for their neighbouring communities.

There are plans to decarbonise Scotland's passenger railways by 2035, scheduled flights within Scotland by 2040 and an ambition to phase out the need for new petrol and diesel cars and vans by 2032, with public bodies taking the lead to phase these out from 2025. We will also ensure that rural and island communities can travel sustainably to access the services they need where those are not provided locally.

The new technologies which are emerging to make vehicles less dependent on fossil fuels will contribute to achieving the net-zero target. However, that will not be enough. We will not plan infrastructure to cater for forecast unconstrained increases in traffic volumes. Instead, we will manage demand and reduce the need to travel by unsustainable modes. Not taking steps to effectively manage demand for car use is no longer an option and our approach will focus on encouraging people not to make unnecessary journeys. Some of our existing infrastructure will need to be adapted for anticipated climate change that may make their location more vulnerable to erosion, flooding, land instability or heat for example.

Freight also has strategic transport needs and it may be that larger settlements, towns and cities require to identify land where distribution centres can be located to enable long distance goods vehicles to be unloaded ahead of onward distribution by smaller and alternatively fuelled vehicles and cargo bikes. Consideration of the location of additional dedicated rest stops or services areas will also be needed.

Connectivity is emerging as a shared priority, and a challenge to be addressed across the range of spatial scales; from local, through regional to national – this is evident in the emerging regional spatial strategies. Whilst the importance of transport links is recognised, we will need to consider how strategies can take forward an infrastructure-first approach which minimises the need to travel. We will use existing infrastructure capacity to direct where growth can happen in a way that is consistent with the travel and infrastructure investment hierarchies.

Around 30 respondents commented on securing strategic transport connectivity.

Managing car use

There was support for interventions to manage demand for car use, and to avoid “unconstrained increases in traffic volumes”. Respondents also saw potential links between managing demand for car use and other NPF4 priorities such as achieving net-zero emission targets and promoting inclusion and equality (by reducing the exclusion faced by those without access to a car). Some also referred to links with town centre regeneration and active travel networks.

However, it was suggested that significant work and investment will be required to achieve the required shift away from car use, particularly outwith urban centres. Comments here focused on a perceived need for investment to improve access to other transport options, particularly public transport, and for better integration of active travel networks. However, some respondents also saw a continuing need for infrastructure improvements to make car use more efficient, or reflected on the extent to which managing demand for car use will require significant behavioural changes around how people live and work in Scotland.

Respondents reported a significant variation across Scotland in access to alternatives to car travel. This included a focus on the extent to which access to suitable affordable public transport remains a barrier for rural communities. Some suggested that NPF4 will have to help reverse long-term decline in access to public transport in some areas.

It was also argued that the Position Statement includes apparently contradictory statements in relation to transport connectivity, with a conflict suggested between support for all forms of strategic transport and recognising the need to manage demand for car use. There was a call for clarity on how the planning system will balance climate change targets with objectives for economic growth in circumstances where these are not aligned. This included specific reference to the Climate Change Plan target to reduce car traffic by 2030.

Reducing freight emissions

There was also support for improved transport connectivity to reduce emissions associated with freight. This included reference to an anticipated increase in the role of alternatives to road freight, and support for the role of distribution centres in enabling onward freight distribution by cargo bikes and other small vehicles. It was noted that the COVID-19 pandemic has accelerated growth in demand for logistics and freight infrastructure, and that NPF4 may have to respond if this demand remains at current levels.

Other issues

Other issues raised with respect to strategic connectivity included that:

- NPF4 must recognise the limits of decentralisation, and the extent to which it is unlikely to be possible for some jobs and workers. There was a perceived need to ensure sufficient transport connectivity between localities to enable necessary travel for work.

- NPF4 should make explicit reference to noise as a key aspect of the impact of transport networks on communities, including consideration of noise as part of the assessment of potential national developments.
- The potential impact of climate change on existing transport infrastructure should be recognised, including reference to specific locations seen as most vulnerable (particularly to coastal flooding).

Finally, a need for NPF4 to respond to changing global markets was identified, particularly in relation to Brexit and renewable energy growth. The potential for these global changes to increase the strategic importance of Scotland's transport connections and gateways with countries outwith the UK was also suggested.

Improve digital connectivity

We will reflect future plans for investment in digital infrastructure and consider implications for our long-term spatial development. Our spatial strategy will continue to support the roll-out of digital infrastructure across Scotland. This will play a key role in maintaining and growing our communities in both urban and rural Scotland, and has potential to form the foundations of a new emphasis on localism.

Scotland's Digital Strategy aims to stimulate innovation and investment in digital technologies and industries across Scotland. Connectivity has a central role to play in unlocking the potential of our places and the economy and in opening up more remote parts of Scotland for investment and community expansion. We have already created permitted development rights for digital infrastructure and recently consulted on proposals to expand these further. These proposed changes need to be delivered in a way that minimises the negative impacts on the natural and built environment and safeguards air safety. Physical distancing arising from COVID-19 has also demonstrated that the planning service is well-placed to drive forward digital engagement in planning and decision making, creating opportunities for a wider range of people to get involved in more strongly influencing the design of their places.

Around 30 respondents commented on improving digital connectivity. Some respondents expressed their general support for the inclusion of improved digital connectivity as a priority for NPF4, including noting its importance in enabling more home-working and reducing travel. The increase in home-working during the COVID-19 pandemic was suggested to have reinforced the importance of access to digital connectivity for all, not only in terms of home-working but also communication and access to services.

However, it was also suggested that the COVID-19 pandemic has highlighted the inequality of access to high quality digital connectivity in Scotland. This included comments around the link between economic deprivation and digital poverty, and to specific barriers such as cost, rural infrastructure and digital skills. It was suggested that NPF4 should consider the underlying drivers of digital inequality and set out where the planning system can help to address these.

Other comments on digital connectivity included suggestions that:

- Lower income workers may be less able to adapt to a shift to more digital working, and that without better access to digital connectivity for all, a continuing increase in home-working could reinforce existing inequality in the workforce.

- The emphasis on digital engagement in the planning system should not be to the exclusion of other forms of engagement; for example, retaining face to face engagement was seen as important if the planning system is to be accessible to all parts of the community.
- More emphasis should be placed on the potential for improved digital connectivity to benefit all parts of the Scottish economy, including ‘traditional’ sectors.
- Increased digital connectivity, by enabling more home working, could adversely impact town centre footfall.
- Approaches to avoid or mitigate adverse visual impacts of digital infrastructure should be emphasised alongside proposals to improve digital connectivity.

With respect to funding it was suggested that public and private development will both be key elements in improving Scotland’s digital connectivity, and that NPF4 should provide some guidance on how this will be co-ordinated and controlled. An emphasis on the potential contribution that local developers can make to improving Scotland’s digital connectivity was proposed.

It was also suggested that improving digital connectivity has been a Scottish Government priority for a number of years, and that more work is needed to increase the rate of change. There was a view that significant investment may be required to achieve the necessary improvement in digital connectivity in more rural parts of Scotland.

A Plan for Better, Greener Places

The final key outcome is Better, Greener Places. The Position Statement highlighted intentions to: support development reflecting the character and identity of distinctive places and neighbourhoods, and safeguard and restore natural assets; promote re-use of vacant and derelict land and buildings; ensure the approach to development focuses more on place and includes stronger and updated policies on design and place-making; broaden policies on city and town centres and on the re-use of historic buildings; future-proof natural and historic assets and coasts; enhance policies on vacant and derelict land; and encourage development that helps to repopulate rural areas.

Further detail on the Plan for a Better, Greener Places was provided under eight headings:

1. Focus on place-based outcomes
2. Achieve higher quality design
3. Re-imagine city and town centres
4. Re-use vacant and derelict land and empty buildings
5. Actively promote working and living in rural Scotland and the islands
6. Protect and restore Scotland's natural environment
7. Protect and enhance our historic buildings and places
8. Adapt our coastline to the impacts of climate change

Question 4: Do you agree with our current thinking on planning for better, greener places?

There was broad support for the Plan for Better, Greener Places. However, some respondents cited specific examples of policy or planning decisions they felt were leading to damage to their local environment, running counter to the aspirations set out in NPF4.

Other general points at question 4 included that there should be:

- Less emphasis on development.
- More clarity on what the policy areas described actually mean.
- More emphasis on protecting the environment and on reversing biodiversity loss.
- Reference to renewable energy development and the infrastructure required to tackle climate change.

The scale of the challenge was also highlighted and was suggested to require new thinking – for example in encouraging development in the countryside, looking beyond retail in town centres, and seeing developers and landowners as key agents of positive change for biodiversity.

Focus on place-based outcomes

The Place Principle means that all action and investment should be place-based to secure multiple benefits. Our spatial strategy will focus on the qualities and character of our places. We want to ensure that all parts of Scotland play to their strengths to support our wider objectives of community resilience, inclusive growth and environmental sustainability. Our strategy will support existing successful places and reflect on those that have not served us well, by considering how Scotland's cities, towns, rural areas, coasts and islands work together to form a uniquely rich and diverse country where everyone benefits from our wealth of natural assets. We will also focus on opportunities for regeneration to ensure our most disadvantaged and fragile communities are prioritised for development and investment.

Climate change action needs to work with our places so that we can effectively focus on climate vulnerable communities and tailor action for a just transition that improves our neighbourhoods. We need to build the resilience of our infrastructure and lifeline links through adapting to the challenges around our changing climate, as well as our unique natural, coastal and historic environment assets. Protecting, restoring and enhancing our natural and cultural heritage should form the foundations of a place-based approach to our future development.

Regional spatial strategies are considering ways in which our land and natural assets can form the basis of a green recovery. The two national parks are exploring their contribution to the quality of life of people living across Scotland, and identifying priorities including affordable housing as key to unlocking their potential. Urban futures will also contribute to this. Emerging priorities from the Glasgow conurbation focus on unlocking the potential of land along the Clyde, across local authority boundaries, to attract investment, strengthen communities and improve the quality of our places. Addressing vacant and derelict land is a common theme across the emerging regional spatial strategies.

Around 60 respondents made a comment on the focus on place-based outcomes.

The Place Principle and spatial planning

A number of respondents expressed support for the application of the Place Principle, which was described as a step-change in how planning can look holistically at areas at various spatial scales. In terms of delivering effective placemaking, comments and suggestions included that NPF4 should seek to align spatial planning with assessments of the capacity of places to accommodate new growth and ensure that neighbourhood and place planning are not focussed solely on the provision of new assets which will require funding.

However, it was also suggested that a place-based approach should not become too focused on existing assets as a context. It should also identify truly new outcomes and seek to catalyse long term change that addresses social challenges. Also with reference to spatial planning, it was suggested that NPF4 should make clear that attaining net-zero carbon emissions will require the provision of more large-scale new infrastructure and that landscape change should be anticipated.

It was suggested that the challenge for NPF4 will be how it accounts for the importance of the Place Principle at a national level while allowing for local interpretation and direction to reflect the variability of Scotland's places. In relation to traditionally harder to reach localities, it was reported that the collaborative and

participative approach to decisions on services, resources, land and buildings can, and in many cases already is, delivering better outcomes for communities.

Further comments about the potential of placemaking included that:

- Planning authorities are increasingly important contributors to delivering wider policy ambitions around health, wellbeing and sustainable inclusive growth. The focus on place will further enhance this role and will also give them more authority when discussing details (for example around housing numbers and design and connectivity and natural capital) with developers.
- A key role of the Place Principle is around encouraging collaborative working and co-ordinating the activity of different partners.
- It will require a local authority or government masterplan level of implementation. Work on public and utility infrastructure is required at a national level, including to reduce environmental impact and allow for improvement to local biodiversity. An example given was that many domestic and urban areas could have significantly improved air quality if electric and low carbon transport is planned and implemented properly.

However, it was also suggested that:

- Place Principles are only effective if they are embedded and sustainable, representative and resourced.
- Clarity around maintenance responsibilities and certainty of maintenance funding must be embedded. It is counter-productive to provide capital funding to deliver new assets with no clear plan or resources for maintenance. The consequence of not doing so undermines place intentions and the principle intention behind new assets leading them to being perceived as harmful rather than beneficial to quality of place.

With reference to the policy framework to support placemaking, one perspective was that policies should not be overly prescriptive, for example they should recognise that quality, usable open space and play areas could have a much higher value to a community than a larger area of unused, green space. However, an alternative view was that placemaking principles should be made more prescriptive. Green space was again a focus, with the suggestion that any changes to the planning system should ensure access to these spaces is both sufficient and equitable in any new development.

Connections between placemaking and other NPF4 themes

Respondents frequently connected the application of the Place Principle with the delivery of other themes set out within the Position Statement (and covered elsewhere within this analysis), including:

- **20 minute neighbourhoods:** The connection between the Place Principle and the 20 minute neighbourhood approach (covered at Question 2) was highlighted. It was suggested that a move to developing proper 20 minute neighbourhoods will need clear and robust changes in NPF4, alongside leadership from the

Scottish Government, to influence local strategic plans and local authority decision making.

- **Community facilities and infrastructure:** Delivering high-quality community facilities in response to a community's needs. The connection was made to LPPs and it was suggested planning must also consider the impact on the infrastructure services of any new development.
- **Cultural heritage:** Protecting, restoring and enhancing cultural heritage.
- **Biodiversity and carbon capture:** The interrelationship between climate change, biodiversity, land use and natural capital needs to be recognised.

Alignment with Regional Spatial Strategies

A small number of concerns were raised about NPF4 aligning with RSSs. It was reported that:

- Councils have not consulted stakeholders in preparing the interim RSSs.
- RSSs have gone far beyond their expected remit (addressing cross boundary infrastructure issues) by identifying housing land requirements and even identifying new "Areas of Restraint" where development will be resisted.

It was suggested that if RSSs are to have any influence, they must be prepared in collaboration with the development industry.

Place Standard Tool

While there was some support for embedding of the use of the Place Standard Tool – including as a reflection of the importance of public involvement in a collaborative approach to place-making – a small number of issues were also raised. These included that:

- While tools such as the Place Standard have a role to play in enabling discussions around design, these do not fit every situation. The use of these should continue to be promoted, but not ultimately required.
- The Tool has been developed to be a simple framework that considers physical elements against social aspects; the ambition to transition to better, greener places, especially with regard to delivering a positive effect on biodiversity, peatland protection and woodland creation is not at its heart.
- With reference to public transport, perceptions, opinions, and value judgements about availability, access, quality and reliability often hold sway without balancing evidential input. Action to address this would strengthen the Place Standard tool.

Achieve higher quality design

We will promote the planning and development of healthier, inclusive, sustainable and well-designed places across Scotland. Good quality development will stand the test of time and provide much wider benefits for people's health, wellbeing, the economy and environment. The public realm, including the design, layout and accessibility of our streets and spaces, has an essential role in creating better places. We will build on the six qualities of successful

places to maintain a cross-cutting policy on design and place-making. We will ensure that more specific sectoral or place-based policies incorporate design considerations that reflect the diverse needs and aspirations of people.

Many existing plans and strategies reflect the importance of design and place-making including Creating Places and the Place Standard.

Around 20 respondents made a comment about achieving higher quality design. Comments tended to be brief sometimes simply offering support for emphasis and recognition being placed on high quality design.

Other general comments included that improving the quality of design of new development should be a fundamental outcome for the planning process. However, it was also suggested that design should not be seen as 'separate', as it is fundamental to achieving positive outcomes in many other policy areas.

In terms of how NPF4 could further support high quality design, suggestions included that a stronger policy direction on the design of places - and incorporating nature based solutions - should be a priority. A connected point was that (as under the previous theme) embedding the Place Principle throughout NPF4 is welcome but that increased support for planning authorities to resist poorly designed proposals will be important. Further comments and suggestions included that NPF4 could state unequivocally that design will be a material consideration, in line with current SPP.

There was also support for the plan to refresh Designing Streets. In terms of that review/refresh, further comments included that:

- The outcome of any review should create a more succinct and cohesive suite of documents.
- To be truly effective, their overall purpose and status needs to be widely understood as a guide for all concerned. They should not become a 'pick and mix' by which individual parts can be 'cherry-picked' by decision makers and designers.

With reference to new housing development, it was suggested that it is often subject to 'value engineering', meaning that the quality of a scheme given planning permission on paper is not reflected when the project is constructed and sold. To address this problem, it was proposed that housebuilders should be required to place greater emphasis on design quality and experience with green infrastructure when they rank contractors and make procurement decisions. As a condition of planning permission, housebuilders should also be required to identify a single person who is responsible for overseeing the design of a scheme from start to finish and can make sure that the housebuilder's construction partners are aware of their role in delivering design value.

With specific reference to MCAs, there was support for there being a framework which clearly and explicitly covers the role of place in delivering on climate, biodiversity and wellbeing. However, it was also suggested that a clear definition, and clarity in terms of 'ownership' and responsibility for delivery, is required. It was suggested that the approach and process is more important than the status and that, rather than being a

tool of restraint, it should be a mechanism used by multiple agencies to deliver development in a co-ordinated manner.

Re-imagine city and town centres

We will look at how our policies can help our city and town centres to respond to current and future challenges so that they can adapt and be vibrant, creative, enterprising and accessible places to live, work and visit.

Scotland's city and town centres were already facing significant challenges prior to the global pandemic. Our living and working patterns in recent months have raised further fundamental questions about their future and wider objectives including climate change and how community empowerment will influence how our town centres will evolve in the future. A new emphasis on localism raises opportunities for town centres that will require a planning policy response, building on our existing approach, to diversify and balance the use of land and buildings, provide services and activities for people of all ages, and stimulate new investment especially in the maintenance and re-use of existing buildings and infrastructure as part of a circular economy.

We will reflect on the Town Centre Action Plan, continue to embed the Town Centre First Principle in decision making and respond to the outcome of the ongoing review of the plan to ensure our policies help to create more vibrant, healthier inclusive and greener town centres. Greater consideration will be given to the provision of more good quality homes in town centres, with access to shops and facilities, which can bring life back into town centres and create good places to live including by making sustainable and efficient use of the existing building stock.

City and town centres have the potential to contribute a great deal to our response to climate change, and to meeting the future needs of our diverse population. By making better and more creative use of our settlement centres, we can significantly reduce the need to travel unsustainably whilst maintaining and enhancing the character and identity of our towns and cities to create vibrant places that meet our future needs. Although the approaches will vary to reflect local circumstances, we will highlight shared opportunities to reinvent town centres and strengthen our networks of settlements.

Around 35 respondents commented on re-imagining city and town centres, with some noting their support for a new approach to town and city centres, recognising the need for these places to be revitalised to create attractive and vibrant places, and the contribution that they can make to wider climate change and economic objectives. It was suggested that the COVID-19 pandemic has accelerated the need for new models for town and city centres.

Respondents expressed specific support for the "town centre first" policy, the integration of the Place Principle and Place Standard Tool in the planning system, repurposing available infrastructure and vacant buildings (including historic buildings), and an integrated approach to development to minimise the need for travel. Links were made to the concept of 20 minute neighbourhoods (as already covered at Question 2). Respondents cited examples of town centre masterplans and other policies seeking to reimagine the character and operation of towns across Scotland.

A need for greater transparency around the research and evidence base that informs the NPF4 policy framework in relation to town centres was also suggested. This was seen as crucial in the context of the impact of the COVID-19 pandemic in accelerating changes to town centre use, and in providing evidence to inform understanding of how town centre sectors might evolve, and the role of sustainable transport options. Some respondents reflected on the degree of change required of town and city centres, including reference to changing shopping habits and the growth in home working. A need for funding and investment to achieve the required change was suggested, as was a focus on stabilising the decline of town centres before looking at significant changes in character or use.

Respondents also cited the Town Centre Action Plan Review Group report “*A New Future for Scotland’s Town Centres*”¹¹ as being relevant to the reimagining of city and town centres and wished to see relevant recommendations reflected in NPF4.

Local approaches

Respondents argued that NPF4 should emphasise the need for a localised approach which takes account of the specific character of each town and city centre and which is integrated with a wider regional spatial strategy (for example reflecting the changing role of out-of-town developments and similar developments). This included for rural and island communities where it was suggested that the locational requirements of rural and remote communities should be considered. However, some also saw a need for a national review of town centres and relevant sectors to inform local approaches. This included for example guidance on which existing uses should be safeguarded, and how to integrate these with new uses.

The role of communities in shaping the approach to their town centres was highlighted, including a role working with planning authorities and developers to revitalise town and city centres. The need to provide communities with training on the planning system to support growth in community input and ownership in town centres was suggested.

Promoting active travel

There was a perceived need for a shift towards town and city centres being planned for people rather than cars, making them attractive places for people to live and work. This included calls for NPF4 to ensure access to high-quality green spaces in town centres, with respondents highlighting potential health and wellbeing benefits.

Transport was highlighted as a key factor in making town and city centres more attractive places for people. This included particular support for reducing the volume of car traffic and promoting active travel and public transport. Some respondents highlighted a need to improve infrastructure to support walking and cycling, including reference to evidence of the prevalence of barriers to walking or cycling. Support for town centres being better designed for cycling in particular included reference to

¹¹ Available at <https://www.gov.scot/publications/new-future-scotlands-town-centres/>.

benefits to retail activity, house prices, reduced health care costs and improved productivity.

Greener city and town centres

Respondents wished to see environmental improvements and consideration of wider climate change targets integrated as part of the approach to revitalising town and city centres. This included suggestions that 'Green Plans' should be drawn up for major towns and cities, setting out specific actions that will be taken to reduce emissions and contribute to net-zero targets. Some also wished to see further detail on how the approach to delivering vibrant and accessible town centres will protect and restore biodiversity.

There was also a suggestion that development on some lower quality green spaces may be beneficial, for example if these developments are better located and are linked to the creation of new green spaces within town centres.

Barriers to regeneration

Concerns were raised around the support for reuse of existing buildings, and potential for this to have unexpected adverse impacts on the diversity of town centres. Higher costs of retrofitting energy efficient technologies to older buildings were suggested to have the potential to affect the viability of projects, and to reduce scope to alleviate fuel poverty and deliver fully accessible homes. However, others suggested that policies around building standards and energy assessments could be shaped to support re-use of historic and other existing buildings.

Respondents also cited other potential barriers to achieving town centre regeneration objectives and wished to see these addressed by NPF4. Specific issues raised included: business rates; a need for use class reform; complex land ownership; surface water drainage capacity (in relation to residential development); and the financial viability of more sustainable development.

Re-use vacant and derelict land and empty buildings

There is a clear case for acting now to prioritise the use of vacant and derelict land and properties. This has the potential to deliver significant benefits including sustainable, inclusive growth and reduced emissions as an integral part of our future sustainable and circular economy.

Scotland has too much vacant and derelict land – this is rightly regarded as unacceptable and an issue of national concern that needs to be urgently addressed. The consequences come at too high a price, directly impacting on health and blighting economic, social and environmental recovery. Vacant and derelict land introduces a level of redundancy that our society can ill afford. Whether it is large scale long-term dereliction, or small scale short-term vacancy, we need to set out a stronger policy framework that will give confidence to communities and public and private sectors that vacant and derelict land represents an opportunity to stimulate a positive future whilst building on the legacy of the past.

Our national planning policies can complement wider work on vacant and derelict land. The Vacant and Derelict Land Taskforce has identified longstanding vacant and derelict sites which the planning system could play a role in bringing back into use and this is a key priority highlighted by the Scottish Land Commission which proposes this as a national priority for

NPF to address, and the Vacant and Derelict Land Fund seeks to provide funding solutions to the issues.

We must change the perception of vacant and derelict land from being a liability to becoming an asset. We could do much to inspire innovation and imagination in considering how we can achieve this. The strategy can set out spatial priorities and opportunities that help to guide future investment.

The relationship between town centres and suburbs and the role of the green belt will also benefit from a long term spatial perspective that reflects our net-zero and environmental ambitions. We will develop a vision for the future use of vacant and derelict land so that regional strategies and local development plans can work collectively to unlock the potential of land within our existing settlements to provide multiple benefits. Supporting this, stronger policies to limit greenfield development and recognise the potential for green belts to form a part of multifunctional green networks could help to achieve positive effects for biodiversity whilst also helping to realise the health and climate benefits of growth within existing urban areas.

Around 85 respondents commented on re-using vacant and derelict land and empty buildings. A number of respondents offered their support for NPF4 having a focus on reuse, including recognising the opportunities for re-development. This included specific support for a 'brownfield first' approach prioritising re-use of brownfield sites over greenfield development, for the review of green belt policy and for potential expansion of land assembly and compulsory purchase.

Respondents also noted the importance of these proposals in terms of reducing development pressure on valuable green spaces, supporting delivery of climate change and other environmental objectives and revitalising town and city centres. It was suggested that the COVID-19 pandemic has further increased the value placed on local access to green spaces, parks and amenities. A number of local examples of policy and projects supporting re-use of vacant and derelict land and buildings were cited.

Respondents also raised a range of concerns or issues for the approach taken by NPF4 in relation to vacant and derelict land and buildings. These are summarised below.

Limiting greenfield development

Reflecting support for prioritising development of brownfield sites, some wished to see NPF4 set out stronger measures to limit greenfield development. This included a suggestion for a presumption against greenfield development unless specific criteria are met, stronger enforcement of conditions on planning permission, or a requirement for all available brownfield sites to have been fully considered before greenfield development is permitted. It was also suggested that a 'regional registers' of available brownfield sites could enable developers to consider these opportunities at the outset.

Reviewing greenbelt policy

In relation to the proposed review of green belt policy, and wider policies to limit greenfield development, some respondents suggested that NPF4 should set out how the planning system will balance delivery of climate change and other environmental objectives with the protection of green belt and other designated areas. This included

suggestions that national developments and other sustainable development on green belt should be permitted where they are required to meet climate change objectives or form part of work to improve the overall biodiversity of specific green belt land. Some respondents specifically referred to the potential need for renewable energy development on some greenfield sites and wished to see this acknowledged by NPF4.

It was also suggested to be “extremely disheartening” that NPF4 addresses green belt policy so briefly, particularly since the threat of loss of greenbelt is a contentious issue for many communities. It was argued that action should be taken to prevent multiple speculative planning applications for development on green belt land.

Recognising assets on brownfield sites

Some respondents suggested that the planning system must recognise the potential for brownfield sites to contain important natural or heritage assets. It was argued that proper environmental assessment should be undertaken on a site-by-site basis before re-development, and that relevant data on biodiversity across brownfield sites should be made available to planning authorities. This included specific reference to ecological, biodiversity and archaeological assessment. It was also suggested that this assessment could identify opportunities for brownfield sites to be re-purposed as part of blue and green infrastructure.

There was also a suggestion that NPF4 should support additional measures for buildings at risk including, for example, Compulsory Sale Orders. Comments reflected a view that NPF4 will need to provide clear policy guidance for planning authorities implementing the ‘brownfield first’ approach to deliver sustainable outcomes, including a recommendation for stronger policy on site requirements including co-produced design briefs.

Empty buildings

Concerns were raised regarding potential for a focus on re-using empty buildings to have unintended negative impacts on the diversity of town centres, and the re-use of historic and listed buildings. Specific reference was made to the cost of conversion and retrofitting of technologies required to achieve low carbon objectives and it was suggested that some relaxation of regulations around the use and adaptation of heritage buildings may be required to support re-use of vacant buildings.

Concerns were also raised regarding the extent to which it is always preferable to re-use industrial units, and the cost associated with developers making the case for demolition and rebuild (and the capacity for planning authorities to assess these cases).

Balancing demand for development on greenfield and brownfield sites

Although supported by many, some respondents argued against prioritisation of brownfield over greenfield development, suggesting that releasing greenfield land for development as part of a planned national strategy could help to contribute to economic and environmental targets. This included reference to limited opportunities for the ‘greening’ and creation of open space through development of urban

brownfield sites. One perspective was that greenfield development will be necessary to meet Scottish Government strategic objectives.

There was also concern that a focus on brownfield sites will be insufficient to meet housing supply targets, and could be at the expense of other beneficial uses such as employment, recreation or green infrastructure. Some respondents suggested that development of green infrastructure may be the preferred option where derelict land is not ideally placed for housing or other development, noting the potential benefits to local communities in terms of providing green space (including for example for food production) and supporting communities to contribute to emissions reduction in their area.

It was also suggested that support for brownfield development has been a development plan priority for some time, but that policy support alone may not be enough to make development of brownfield sites viable. Reference was made to a range of factors that have limited re-development of brownfield sites to date, primarily relating to the costs of making land viable for development. These included reference to: site ownership; demolition costs; conversion costs; assessment and remediation of contaminated land, including for sites previously used for or adjacent to storage of hazardous substances; drainage and flood risk; constraints on land-use due to development plan zoning; and restrictions on 'meanwhile' uses of vacant land or buildings.

It was suggested that significant public intervention and funding will be required to facilitate the development of many brownfield sites, particularly in rural areas where, it was suggested, the viability of sites can be more significantly impacted by the factors noted above.

The need for a wider review of planning, roads and building standards regulations as part of a holistic approach to re-use of vacant and derelict spaces was suggested and it was recommended that the Scottish Government considers exemplar cities which have successfully brought derelict or vacant land back into use, to identify which regulatory interventions have been required.

Some respondents felt that NPF4 should acknowledge that vacant and derelict land is also an issue for many rural areas. It was suggested that some local plans currently oppose redevelopment of rural brownfield sites, and clarity on whether NPF4 support for brownfield development would include rural locations was requested.

Community involvement in decision making

The importance of communities being able to contribute to the approach to re-use of specific derelict or vacant land and buildings was highlighted, including through contribution to LPPs. However, there was also a view that there have been inequalities in the opportunity and capacity for communities to inform this process. For example, it was suggested that some communities have been left out of opportunities to re-use derelict and vacant land and buildings due to both lack of resourcing, and a failure to connect with local communities. It was suggested that the approach to re-use of these sites and buildings must be embedded within local communities, and properly resourced. There was also a suggestion that NPF4 should ensure that

prioritising of brownfield sites for development takes account of inequalities, for example by prioritising vacant and derelict land in areas of deprivation.

Actively promote working and living in rural Scotland and the islands

The issues arising from COVID-19 and future impacts of Brexit mean that the time is right for a fundamental rethink on how we can support a positive future for rural Scotland. Development planning in Scotland is now required by the Planning (Scotland) Act 2019 to contribute to increasing the population of rural Scotland, particularly in depopulated areas. Last year we commissioned research to explore how future planning policy can support strong and vibrant rural communities and economies in the coming years, and identified scope for significant policy changes in NPF4. Our National Islands Plan identifies how we can improve outcomes for our island communities and our approach will be informed by an island communities impact assessment.

We are currently exploring significant changes to our policies on rural and island development, to support prosperous and sustainable communities and businesses whilst protecting our unique natural assets. Our rural areas and islands are one of our greatest assets and our strategy will reflect our ambition to build low carbon rural communities where the quality of life is exceptional. We will identify opportunities to build the long term sustainability of our more fragile areas by highlighting infrastructure requirements and facilitating development that strengthens their future. While it is right that rural and island areas are developed in a different way to our urban centres, people still need to be able to access goods, services, healthcare, education, work and recreation in a fair, affordable and low carbon way for health and wellbeing. Access to low carbon heat options and water supplies are of critical importance for households that are not connected to wider networks. Local authorities have been working together to explore what low carbon rural living will look like in the future and this will inform a new national spatial strategy with supporting policies. NPF4 will need to align with a wide range of policies relating to rural development including our National Islands Plan, Forestry Strategy, the Rural Economy Action Plan and the Land Rights and Responsibilities Statement. There are particular opportunities to link planning more closely to the Land Use Strategy and Regional Land Use Partnerships, to achieve an approach to future development at national, regional and local scales, that more fully supports, and is supported by, wider land use management.

Rural repopulation is a key theme for emerging regional spatial strategies including for the South of Scotland, Argyll and Bute, Western Isles, Orkney and Highland, where authorities are exploring how the areas' high quality of life and environment, growth of local economic development together with a growth in remote working can unlock new futures for rural communities and businesses. Emerging strategies are also exploring how the challenge of an ageing population can be addressed through long term planning.

Around 45 respondents commented on working and living in rural Scotland. There was support for a change of policy approach to actively promote working and living in rural and island areas. There was particular support for the focus on rural repopulation and for links to land use and other policies and strategies including the National Islands Plan, the Land Use Strategy and Rural Planning to 2050. Local policies and developments seen as having a contribution to make to the desired policy outcomes for rural Scotland were also referenced.

Some respondents wished to see NPF4 set out more detail on policies for rural development. This included suggestions that rural and island communities differ

greatly in terms of the scale and type of development that may be sustainable, and a wish to see a tailored approach developed with planning authorities. The need to ensure that development is supported by sustainable infrastructure, including transport and digital connectivity was also highlighted. It was suggested that LDPs are the most appropriate place to specify how rural development is to be supported, given the variation in rural areas across Scotland.

There were specific concerns that the focus on rural repopulation should not risk the quality of countryside environment by permitting unsustainable development in rural areas, and a view that NPF4 must be clear on how planning authorities can strike this balance. This concern was also expressed in relation to countryside around populated areas; some respondents wished to see NPF4 include policies specific to these areas and recognise that they can come under significant pressure from developers.

A number of respondents suggested that, while NPF4 policy support for sustainable development in rural areas is welcomed, the Scottish Government should recognise potential for barriers to limit sustainable development. This included reference to what were seen as excessive regulatory requirements for some rural development, where it was felt that regulations have not been adapted to the specific characteristics of rural areas.

Reviewing policy on wild land

Some respondents objected to the proposal to consider whether wild land policy needs to change to support repopulation of rural Scotland, expressing concern that permitting more development in wild land areas risked degrading the quality of these areas for the benefit of what was expected to be a small number of housing units. These respondents wished to see policy support for rural repopulation focused round established settlements and infrastructure.

However, others argued that current wild land policies are overly restrictive and curtail sustainable development such as renewable energy projects. These projects were seen as offering key opportunities to stimulate rural economies and support repopulation.

Sustainable development

Reference was made to a range of specific economic sectors and land uses which were seen as having potential to contribute to sustainable economic growth, to develop sustainable communities and support rural repopulation. This included: renewable energy development; aquaculture; education; tourism and holiday accommodation; and creative industries.

Some respondents wished to see a greater focus on ensuring rural communities can offer opportunities for young people, noting that this was identified as a key priority by the Land Use Strategy.

In relation to a proposed national spatial strategy to support low carbon rural living, it was suggested that this should take account of the potential role of local energy systems, particularly in off-grid locations.

However, it was also suggested that the focus on promoting working and living in rural Scotland may conflict with net-zero targets.

Protect and restore Scotland's natural environment

Our spatial strategy will strengthen our approach to protecting and restoring the health and quality of Scotland's natural environment. We will ensure that our approach to planning supports Scotland's role in responding to the twin global crises of biodiversity loss and climate change, including by strengthening policies designed to protect and restore Scotland's biodiversity and natural assets and to improve their long term resilience to the impacts of our changing climate.

Our national planning policies include measures to protect Scotland's unique natural environment, reflecting the hierarchy of natural heritage designations, from international networks to locally important landscapes and nature conservation sites. Building on this, we will strengthen policies to protect and restore biodiversity and natural assets. For example, the Planning (Scotland) Act 2019 requires NPF4 to set out how development will contribute to securing positive effects for biodiversity and we are keen to build on existing good practice in Scotland and elsewhere. It also requires planning authorities to prepare Forestry and Woodland Strategies for their areas as a way of guiding future woodland creation and supporting the sustainable management of existing woodlands to increase the social, environmental and economic benefits they can deliver. We will look to align NPF4 with the vision and outcomes of Scotland's new Environment Strategy and the principles set out in the Land Use Strategy as well as considering the issues for the natural environment arising from the Climate Change Plan and Adaptation Strategy.

Our approach will recognise the fundamental role that a healthy and resilient natural environment plays in supporting Scotland's economy and the health and wellbeing of our communities. It will help to ensure that our natural assets are managed in a sustainable, regenerative way so they can continue to provide the benefits Scotland's people and businesses rely on.

Around 70 respondents made a comment about protecting and restoring Scotland's natural environment.

There was support for strengthening the approach to protecting and restoring the natural environment and for the focus on biodiversity which, it was argued, should be central to decision making throughout the planning process. In addition to protecting existing habitats, it was suggested NPF4 should incorporate policies that make nature recovery a consideration in every planning decision. It was also argued that SPP should support the new Scottish Biodiversity Strategy.

The need for SPP to include stronger policies to secure positive effects for biodiversity was also suggested and, specifically, that it should enshrine the UN Sustainable Development Goal target of integrating "ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts".

There was disappointment that proposals for a National Nature Network are not taken forward in the Position Statement.

Positive effects for biodiversity from new developments

Securing positive effects for biodiversity from new developments was welcomed, with an observation that partnership working between developers, local authorities and key stakeholders should be promoted to ensure co-ordinated action. It was suggested the policy should also include the marine environment where the aquaculture industry can contribute to biodiversity enhancement. The importance of local authorities having access to all available biological data was also highlighted since it was argued some brownfield sites have “rewilded” and may themselves be havens for biodiversity. It was argued that NPF4 must emphasise application of the mitigation hierarchy¹² to ensure any biodiversity gain is additional to the mitigation required to prevent environment damage.

Absence of any reference to biodiversity net gain (BNG) in the Position Statement was noted, and it was suggested this a widely accepted term, the absence of which may be confusing for developers. The comprehensive guidelines and well-established case studies relating to BNG were also noted and it was suggested that, at present, NPF4 lacks information on mechanisms for achieving positive effects or on how they will be measured. A requirement to explain the terms ‘positive effects’ and ‘positive outcomes’ was also suggested.

There were contrasting views on the intention to deliver “positive outcomes for biodiversity from development without the need for overly complex metrics.” One perspective was that this is the correct approach, with a suggestion that the BNG metric approach in England has the potential to significantly hinder the growth of low carbon energy, for negligible environmental benefit. An alternative view was that the DEFRA metric is straightforward and established, and that many industries, have already adopted the BNG approach and metrics successfully in Scotland.

A standardised methodology, metrics, and focus on a Scotland-wide approach was argued to be essential to avoid delays and complexity and it was suggested updated UN biodiversity frameworks should be taken into consideration when formulating the metrics to be applied. It was also suggested that, to ensure a proportionate approach, smaller scale developments and certain types of development could be kept below the threshold at which the metric approach would apply. Whatever the approach, it was argued that NPF4 must ensure policies to secure positive effects for biodiversity are accompanied by robust means of enforcement.

Other points with respect to biodiversity gains from new development included a suggestion for emphasis on integrating species habitation structures, such as nest boxes into new builds.

Safeguarding and promotion of forestry, environmentally significant locations and green or blue corridors

¹² A sequential process to avoid, mitigate and compensate negative ecological impacts and effects.

The safeguarding and promotion of forestry, environmentally significant locations and green or blue corridors was welcomed, although it was also suggested consideration should be given to incorporating the concept of 'natural capital', including as a funding tool and economic lever to meet objectives of nature conservation and growth. However, concern was expressed that any application of natural capital approaches must make clear what is expected of everyone involved in the development process.

Woodland

As already noted at Question 1 in terms of nature-based solutions, there was broad support for creation and protection of woodlands and, specifically, for protection of ancient woodlands.

Specific suggestions included both that woodland creation should take priority over other habitats and that it will be important to ensure policies support planting in locations which will not have negative impacts on other important habitats. Other suggested requirements included that:

- Species selection should be site-specific, with a focus on native species.
- There should be a mix of commercial species and broad-leaved trees.
- Tree planting should include urban environments.

Clarity was also suggested to be necessary to understand when woodland removal requires compensatory planting, to ensure this is not requested in inappropriate situations.

Peatland

Issues relating to peatland are also covered at Questions 1 and 3, but in the context of protecting and restoring the natural environment, several Energy Suppliers noted their own record or that of the onshore wind industry in general to peatland restoration work and other environmental improvements. Concern was expressed that reference to "restricting...development on peatland" could be interpreted as a blanket ban on any development, without recognising the opportunity for the net benefits of wind farms. It was suggested that NPF4 should acknowledge it is not always possible for developments to avoid all peatland resources.

Other comments in relation to protecting soils included that NPF4 and the Land Use Strategy should address the problem of unsustainable soil erosion on agricultural land.

Wild land

The Position Statement notes that there will be consideration of whether policies on wild land need to change in the context of requirements in the Planning (Scotland) Act 2019 to support the repopulation of rural Scotland. There was support for this approach, particularly amongst Energy Supplier respondents, who reported the barrier that wild land areas can present for wind energy development and that, as a consequence, new proposals are coming forward that are closer to houses and settlements or in landscapes less well suited to commercial scale developments.

Also suggested were:

- Clarification that any changes in the spatial framework should unlock land for renewable energy, and are not just seen in the context of repopulating rural areas.
- An EIA-led approach for renewable developments.
- Redrawing wild land areas to take account of local knowledge or the needs of local communities.

However, other respondents made the case for retaining or strengthening protection for wild land areas with arguments that wild land is an important national asset that should be managed sensitively. Retaining the framework on appropriate locations for onshore wind farms set out in SPP Table 1¹³ was proposed as the backbone to a spatial strategy that strengthens the approach to protecting and restoring the natural environment. Recognition of wild land areas as part of a National Nature Network was also suggested.

Reservations were also expressed with respect to a review in the context of repopulating rural areas, with suggestions that there should be no conflict in this respect given the extent of wild land areas and the likely sites for expanding rural populations. It was argued both that, as the number of people who would want to live in designated wild land areas would be extremely small, the benefit to re-populating rural areas would be insignificant, and also that one of the ways to combat depopulation is to maintain these rural areas as an attractive place to live.

Other points on wild land included that there should be:

- Recognition that many of its qualities now considered to be ‘natural’ are in fact a product of the intervention of people, over time.
- An update of wild land mapping to understand how quickly wilderness qualities are compromised.
- A more positive policy narrative on the value of wild land, drawing out broader benefits in addressing the climate and biodiversity emergencies, as well as recognition as an important landscape, recreation and tourism asset.
- A new approach to wild land areas to make consultation with local communities on planning proposals mandatory. Such consultation would ask local people where they think any new development should go, and would cover LDPs and alternative siting and design options.

Green and blue corridors

In terms of green and blue corridors, there was support for both a National Nature Network and the Central Scotland Green Network. The value of connecting habitat was highlighted, with a suggestion that climate change will make this increasingly important to minimise the effects of shifts in species ranges. The role of greenbelt, both in its own right and as part of a green network was noted, as was commitment to

¹³ Available at <https://www.gov.scot/publications/scottish-planning-policy/pages/6/>

resource Forestry and Land Scotland towards acquisition and remediation activities that will assist in the creation of green corridors.

Landscapes

It was suggested NPF4 gives only limited recognition to the importance of landscape, that national and local landscape designations should be safeguarded or that relevant wording from NPF3¹⁴ should be retained. Other suggestions included that NPF4 should reframe landscape as an asset rather than a constraint in transition to net-zero and should better engage in meaningful discussion with communities and stakeholders.

It was also argued that NPF4 should be clear that:

- Certain parts of the country are suitable for renewable generation technologies and others are not.
- Attaining net zero will require the provision of more large-scale new infrastructure and that landscape change should be anticipated.

A need for NPF4 to take a proactive role in facilitating acceptance of renewable energy schemes in landscapes was suggested. It was also argued that solar technologies can occupy green spaces without undermining local aesthetics or amenities.

Locally important assets

It was reported that SPP currently provides adequate policy for the designation of local landscape and nature conservation sites, although that clarity could be improved and that a nationally consistent level of protection (or minimum protection) for local sites could be set out.

However, it was also suggested that non-statutory designations such as Local Wildlife Sites appear to have little impact on development applications, and it was proposed a new designation of a “Site of Special Community Interest” could provide greater protection.

Other points on locally important places included that:

- All natural assets should be assessed for the level of protection needed, and that this process should involve community knowledge.
- There should be clear criteria regarding use of EIAs which, it was reported, may currently be discouraged as being too onerous.

¹⁴ “Scotland’s landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland and all landscapes support place-making. National Scenic Areas and National Parks attract many visitors and reinforce our international image. We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset. Closer to settlements landscapes have an important role to play in sustaining local distinctiveness and cultural identity, and in supporting health and well-being.”

Protect and enhance our historic buildings and places

‘Our Place in Time – the Historic Environment Strategy for Scotland’ sets out a vision for how we will care for, understand and promote access to our historic environment. It recognises the important contribution that historic sites and buildings make to communities across Scotland; promoting a sense of belonging and identity, encouraging civic participation and supporting local economies. Our policies for the historic environment will aim to respond to the outcomes and objectives of the Strategy.

Like our natural environment, our historic buildings and townscapes are key assets that contribute to our sense of belonging, economy and quality of life. Planning should provide the framework in which change in the historic environment can be managed sensitively to preserve the special characteristics of our buildings and places, while also ensuring that we capitalise on the opportunities they offer. In doing so, we will acknowledge that the historic environment is itself an asset that can help us to deliver our wider policy ambitions for example, for mitigating climate change, improving health and providing housing.

Since NPF3 was adopted, Historic Environment Scotland (HES) has been established as our lead public body for the historic environment. In 2019, HES published Historic Environment Policy for Scotland (HEPS). We will consider our policies for the historic environment in relation to HEPS to ensure a consistent framework for decision making.

Around 25 respondents made a comment about protecting and enhancing historic buildings and places. There was support for the intention to protect and enhance historic buildings and places, although also an observation that the historic environment is not just buildings and places as Scotland’s landscapes – including wild land areas - are largely a product of human activity over time. In this context it was suggested that “protect and enhance our historic buildings and places” might be revised to “protect and enhance our historic environment”.

It was also suggested that the Position Statement should acknowledge that the historic environment is a finite resource which cannot be replaced, and should place increased emphasis on facilitating the acquisition and re-use of neglected historic buildings to secure their long-term future - a strategy to enhance and conserve the historic environment through rejuvenation for the benefit of wider society, the local economy and future sustainability targets.

Other suggestions were:

- A specific reference to archaeological remains.
- A definition of ‘historic assets’ to differentiate them from ‘brownfield sites’, as it was reported that nationally important monuments have been described as brownfield sites.
- A more holistic approach to the management of designated historic battlefields, and gardens and designed landscapes.

Respondents also welcomed recognition of the importance of the historic environment as an integral part of Scotland’s sense of place, and of historic buildings and places as key community and economic assets with potential to contribute to delivery of wider policy ambitions including in relation to climate change. The role cultural heritage can play in supporting town centres was also noted. It was reported that

forthcoming Historic Environment Scotland (HES) guidance “Talking about Heritage” will help communities to identify the land and buildings that are important to them as part of the LPP process.

While ‘re-use where appropriate of historic buildings...’ was supported, it was also suggested that:

- Locally important, non-designated assets currently lack sufficient protection in LDPs, and valuable interiors are being lost as a result.
- Protection should include the broader context of the building or place not just the immediate vicinity.
- “Appropriate” needs to be defined as this could be problematic from the perspective of a future user and/or one wishing to maintain the *status quo*.
- Cost implications for conversion and retro-fitting might have an adverse impact on diversifying town centres, and the policy could have an unintended adverse impact on the re-use of historic and listed buildings.
- Refurbishing Victorian building stock will require flexibility on heritage restrictions and policy recognition that loss of some heritage assets may be acceptable in order to deliver wider economic and community benefits. This view was suggested to be in line with Historic Environment Policy for Scotland (HEPS) and HES guidance on Managing Change in the Historic Environment.

Alignment

The intention that NPF4 will maintain, strengthen and clarify existing historic environment policies, and align them with both Our Place in Time and HEPS was welcomed. Good management of the historic environment - including both designated and undesignated heritage assets – was suggested to be central to the delivery of other outcomes, especially in relation to place. The importance of policies that reflect the value of heritage in its own right, as well as recognising that it is an enabler across principal policy areas was highlighted.

Heritage Impact Assessments

There was support for making Heritage Impact Assessments mandatory for all listed building and conservation area applications, including to offer another tool to consider the potential impacts of development.

However, it was also suggested that:

- It is unclear what benefit this policy change will achieve that is not delivered by existing mechanisms.
- There are concerns with respect to how the expertise and neutrality of assessments can be assured, and that model baseline approaches might need to be developed.
- Such assessments may serve little practical purpose and may become a barrier to the maintenance and reuse of historic buildings.

- Formal assessment should only be required where appropriate, rather than as a blanket requirement.

Other issues raised:

With respect to the intention to “future-proof our natural and historic assets and coasts...” the need to protect historical assets from flood risk was suggested, but also that, in some situations, this may prove unrealistic without significant sea-defences that themselves damage the landscape.

Finally, it was reported there are concerns across the sector as to where planners and others within local authority teams dealing with heritage will point decision makers. Inclusion of detail in documents such as PAN 2/2011 ‘Planning and Archaeology’ in the new NPF4 as a form of supplementary planning guidance was requested.

Adapt our coastline to the impacts of climate change

We will consider how the future development of our coastal areas and communities can be achieved in a way that helps them adapt to long term challenges. Terrestrial and marine planning come together in our coastal areas, and NPF4 will align with Scotland’s National Marine Plan as well as sectoral plans for offshore wind and aquaculture, emerging regional marine plans, plans for our ports and harbours and the Blue Economy Action Plan. The Scottish Crown Estate Act 2019 will also provide opportunities for coastal communities to benefit from their own assets, opening up new opportunities for strengthening their future. We will consider whether proposed national developments can help us to deliver on this vision. The full list of proposals we have received is available to view at www.transformingplanning.scot and includes, for example: area-based environmental transformation projects; green and nature networks; town centres; regeneration projects; rural developments; and redevelopment of vacant and derelict land.

Around 20 respondents commented on adapting our coastline to the impacts of climate change.

The potential impact of coastal erosion was highlighted, and it was reported that the Dynamic Coast project¹⁵ is providing case studies that include developing adaptation plans for vulnerable stretches of coast. It was also suggested there could be an opportunity for NPF4 to embed marine and coastal planning in the planning system more strongly and to articulate how and where nature-based solutions could apply, in light of funding for flood risk management and coastal change adaptation announced in the Programme for Government of September 2020. Adapting communities to flood risk and coastal change was noted to have significant resource implications.

Recognition of the need to align terrestrial and marine planning was supported, with a view that it is essential that conservation action in the marine environment includes land management and terrestrial activity. It was suggested to be essential that NPF4 recognises the role Scotland’s marine environment can play in tackling both the climate and nature crises and that Scotland’s network of Marine Protected Areas is completed. There were also calls for the development and adoption of RMPs to

¹⁵ Dynamic Coast: Scotland’s Coastal Change Assessment is available at <http://www.dynamiccoast.com/>

address specific regional pressures and to integrate with other management plans, such as LDPs.

Alignment of marine and terrestrial planning was also identified as of central importance in relation to offshore wind energy, to ensure offshore development is provided with the necessary onshore infrastructure including grid connections, substations, and improvements to ports and harbours. It was suggested that the commitment to revisit the interface between terrestrial and marine planning should be considered alongside wider UK and Scottish Government offshore wind policy streams focused on reducing current barriers and delays to offshore wind delivery.

The proposed support for the development and infrastructure needed to realise the potential of the blue economy and coastal communities was also welcomed, in relation to the contributions that could be made by:

- Development and implementation of Nature Networks.
- Ports and EcoPorts.
- The aquaculture industry.

Several specific policies were proposed with respect to aquaculture development, including incentivising development in rural communities that would benefit from regeneration and redevelopment of the waterfront, and identification of dedicated areas which would allow the aquaculture sector to trial innovative technologies and bring investment to local communities.

Other potential opportunities highlighted for coastal communities included:

- Development in relation to cruise ships and pleasure boats.
- Circular economy opportunities for example arising from the waste from seafood processing.
- Potential for agroecology.

Delivery

Question 5: Do you have further suggestions on how we can deliver our strategy?

Around 190 respondents made a comment at Question 5, with some comments extensive. The analysis below provides a summary, but please note that all comments are available in full to the policy team at the Scottish government.

General comments included that delivery mechanisms to implement NPF4 will need to be robust and innovative and be supported by collaborative partnership working. It was suggested that it will be important that Planning, and specifically Chief Planning Officers, are represented at the highest local authority level to help enable delivery of NPF4.

There were also calls for the delivery programme to be co-produced with local authorities and Key Agencies and for a more cross sectoral approach to both development and delivery of the strategy. It was suggested that wider aspirations, such as the Place Principle, 20 minute neighbourhoods and a wellbeing economy, may be better achieved by looking beyond Planning alone. Support for local authorities in the form of a national delivery agency was also proposed.

Other general issues respondents identified as important for successful delivery of the strategy included that:

- More robust wording is needed, with some arguing that NPF4 should require actions rather than offering support for them. It was suggested such clarity is important in allowing Planning Authorities to make decisions with confidence.
- NPF4 should be accessible to everyone, not just planning professionals. Consideration should be given to how elected members, community councils and the public view the document.
- A one-size fits all approach should be avoided. Allowing for local variation is more likely to promote local engagement and involvement.
- The distinction between the differing needs of rural and urban areas should be clear.
- There should be explanation of how the changes required to deliver on climate targets can also deliver other outcomes around promoting greater health and wellbeing and reducing inequalities.

It was also suggested that further details and guidance will be required with respect to funding, timescales, monitoring and delivery partners.

Funding: Suggestions with respect to funding included that delivery must have resources and costs at its heart and that, ideally, a fully funded delivery strategy should be delivered in tandem with NPF4. A structure for signposting to, and co-ordinating with investment strategies that are led by other interested parties (including public and private bodies) would be helpful; this could advise where investment should be directed, from which sources and for what purposes.

Timescales: The need for defined timescales and priorities for delivery were also suggested. To allow for better understanding of timeframes for progressing the work, information on the timing of suggested policy changes outlined in the Position Statement was requested.

Monitoring: It was argued that monitoring the impact and outcomes of planning policy should be an integral part of the system. Proposed elements included:

- A set of indicators against which policies can be evaluated.
- Systems for tracking, benchmarking and monitoring.

The need for transparency was also highlighted, including publishing performance data and progress reports. Recent work on planning performance, including the Planning Performance Framework, and provisions in the Planning (Scotland) Act 2019, was reported and further collaborative work to ensure that performance measuring accurately captures NPF4's outcomes-focused priorities was proposed.

Delivery partners: There was a call for further detail on the identities and responsibilities of delivery partners, and it was suggested that the linkages and relationships between participating partners should be set out.

Planning resources

Respondents highlighted the importance of ensuring local authorities and Planning Authorities have proper training and resources in order to play their role in delivering NPF4. The importance of staff training was highlighted, and a lack of specific ecological expertise and influence was suggested.

It was argued that NPF4 should not seek to pass additional workload on to local authorities. If local authorities are tasked to undertake an action, help to specify the work required should be provided, with national resources to support that work. It was also suggested that a move towards full cost recovery should be considered and that the burden of resourcing a radical change of approach cannot simply be passed to the private sector.

There was also a call for increased investment in planning and wider consenting services. A specific suggestion was that the Scottish Government should better fund design governance capacity in local authorities. These funds should directly support design-led plan-making, masterplanning, improved community engagement and leadership positions within local authorities.

Operation of the planning system

In association with comments on resourcing for the planning system, respondents were looking for streamlining of planning procedures, or a faster consenting process. Suggestions included that:

- The Scottish Government should change the appropriate legislation/regulations to allow developers to use digital EIA tools to submit applications.

- Planning procedures should be streamlined. This was connected to solar power developments, renewable energy developments and marine farming projects in particular.

Respondents also commented on the role of the recently published Digital Strategy for Planning¹⁶ in the delivery of NPF4 and SPP, with one of its key missions being to unlock the value of planning data. Consistent and quality datasets were seen as crucial to supporting policy changes and evidencing decisions made. A number of respondents noted their willingness to work with the Scottish Government to ensure robust data is available.

It was also seen as vital that all local authorities develop the capacity to manage, maintain and use the best spatial data available, to the best effect, to inform evidence-based decisions. Bringing skills across all authorities up to the highest level possible was argued to be extremely important.

Alignment

The importance of consistency of approach across national strategies was highlighted including maintaining alignment between NPF4 and other national strategies. For example, it was suggested that NPF4 should be reviewed in line with revisions to the Energy Strategy and the Land Use Strategy. However, it was also noted that while useful, alignment does not provide a hierarchy and it will be important to clarify which policies and strategies will have primacy.

The absence of significant reference in the Position Statement to either the National Performance Framework or SPP was noted. With respect to the former it was suggested that the final NPF4 should incorporate commitments, including the national outcomes, from the National Performance Framework.

With specific reference to the Land Use Strategy it was suggested that NPF4 must make clear how the 10 Principles of Sustainable Land Use will influence planning decisions on the ground.

There was a query as to whether the intention to merge SPP with NPF4 remains. While this was supported, a concern was raised that it could lead to important policies being 'relegated' from SPP into a lower tier of guidance. Retention of good practice guidance from SPP was advised, and it was suggested that a timetable should be set for updating guidance and advice notes to bring them in line with the new spatial strategy.

We will work with the national Infrastructure Delivery Group, involving the full range of public and private infrastructure delivery organisations, to consider the draft NPF4 as it emerges and identify how it can be supported by a delivery programme that relates to development planning at all scales. This type of improved collaboration with infrastructure providers will also play a key role in helping us to embed an infrastructure first approach to planning and development within the context of the new system.

¹⁶ Available at <https://www.gov.scot/publications/transforming-places-together-scotlands-digital-strategy-planning/pages/13/>

There was support for the infrastructure-first approach set out in the Position Statement and for alignment with work being undertaken by the Infrastructure Commission for Scotland and with the National Infrastructure Investment Plan.

While the intention to make best use of available capacity before investment in new infrastructure was welcomed, it was also argued that NPF4 should also set out remedies for instances where there are strategic shortfalls in existing infrastructure.

The need for collaboration with infrastructure providers was considered important, including to ensure an integrated, outcome-based approach to land use planning. It was also suggested that:

- Early engagement between infrastructure providers and other public bodies will be needed to ensure the burden of delivery is apportioned appropriately.
- NPF4 should identify private sector-led growth areas and co-ordinate this with public infrastructure plans so burdens and risks are shared between local authorities and developers.

Also with respect to collaborative and partnership working, it was suggested that driving cross-boundary infrastructure projects will be important and that co-ordination of activity will be vital, as will the financial resources for “joined up” delivery. A linked capital investment programme was seen as the best vehicle to help deliver the ambitions of NPF4.

It was noted that co-ordinated infrastructure planning will be a key part of the new Gatecheck and Evidence Report requirements and further guidance on the scope and content of these requirements was expected. There was interest in exploring mechanisms that could support up-front delivery of infrastructure.

We will continue to support planning authorities as they develop their early thinking on regional spatial strategies. We expect to broaden the conversation on this emerging thinking in the coming months and have published an update on progress alongside this Position Statement. Indicative strategies will continue to inform our national priorities. In turn, NPF4 can support the delivery of regional priorities by identifying significant place-based opportunities for infrastructure planning to reflect and respond to. Alignment with city and growth deals at this scale will also be critical to ensure that land use planning at a regional and national scale supports delivery of agreed priorities.

There were concerns that RSSs are being produced without input from stakeholders and are not taking a consistent approach with respect to considering housing numbers. It was argued that NPF4 must set out clear and transparent land requirements for development in each area and that these requirements should be linked to spatial strategies and other growth frameworks.

Given their contribution to Scotland’s future, it was argued that appropriate oversight is required to ensure they are being produced consistently. If NPF4 is being informed by the RSSs, there is a need for consistency in what they address, and NPF4 needs to be clear on the scope of these emerging RSSs.

We will also articulate how we expect an infrastructure-first approach to be embedded in the spatial strategies of local development plans. This includes ensuring that our plans are informed by evidence as recommended by the Infrastructure Commission for Scotland, focusing on need, demand, opportunities and geography. Part of this is the appropriate appraisal to determine the infrastructure requirements of potential spatial strategies at the start of the plan process, including who will fund and deliver it. This will ensure land use decisions are informed by these requirements rather than being developed after the land use decisions have been made. In the past this has led to sub-optimal infrastructure solutions that are not capable of being funded or delivered.

The intention to articulate how an infrastructure-first approach should be embedded in the spatial strategies of LDPs was welcomed, and it was agreed that clear guidance is required. Clarity about the methodologies to be used to determine infrastructure was seen as important.

It was reported that different financial landscapes in rural and remote rural areas mean the primary route for infrastructure is through the public sector and it was suggested that how the private sector can be better incentivised and/or rewarded to provide infrastructure in rural areas should be considered.

It was also argued that the proposed infrastructure-first approach to development suggests an implicit reliance on grid infrastructure (electricity, water supply, wastewater treatment, telecommunications) and an assumption that infrastructure provision, and hence settlement patterns, are driven by economies of scale arguments. There was a concern that this approach will not provide opportunities for the innovation required to repopulate rural Scotland.

Local place plans were also introduced by the Planning (Scotland) Act 2019, enabling communities to prepare plans for their own places. Community scale planning has an important role to play in the new system and we will consider its role in helping to deliver outcomes as we develop regulations and guidance alongside NPF4.

With respect to more involvement of wider society in the planning process, it was suggested that the Scottish Government should ensure that easily accessible platforms and opportunities for engagement are made available, both during preparation of NPF4 and afterwards when major developments are proposed. There was also a call for action to address inequality of opportunity to participate, with specific calls for a greater voice for children and young people and groups such as Gypsy/Travellers.

A number of respondents commented on the involvement of communities in the planning system, with arguments that the planning system should:

- Engage with and listen to local communities, and that consultation should apply to retail and transport projects as well as to housing developments. It was also suggested there should be better engagement with community groups and organisations trying to achieve 'green' objectives.

- Ensure the consultation is meaningful and not simply a cosmetic exercise. It was suggested that at present community consultation happens at the end of the process when, it may appear, decisions have already been made.
- Allow communities to contribute to the design of developments and materials.
- Give communities the right to appeal and provide resources to enable them to challenge decisions.
- Reference the role of Community Councils – as the only community group with a statutory role in planning.

It was argued that training will be required, to support communities to better understand a complex system and around developing and implementing LPPs. LPPs were seen as a good way for communities to have their say, but it was also argued that they must provide real powers to influence planning decisions. Other points on LPPs and communities included that:

- Communities should be helped to find a positive role for LPPs so that they do not become a barrier to delivery and a new source of conflict.
- NPF4 must describe the methodology for calculation of required housing land in a manner that can be understood by members of the community.
- Consideration should be given to how LPPs can be used in the absence of local community controlled bodies but where there may be opportunities for other actors to lead the LPP process.

It was suggested that a way of measuring and understanding how well public authorities, property owners, and developers are engaging with citizens should be developed.

We are carrying out a review of existing developer contributions mechanisms, such as planning obligations, which will inform our future policy approach. This includes not only NPF4, but also potential updates to Circular 3/2012 and implementation of the infrastructure levy, powers for which are contained in the Planning (Scotland) Act 2019. Subject to the findings of the review, we will explore how we can provide greater certainty, consistency and clarity around the scope and use of developer contributions, including to identify, fund and deliver infrastructure up-front. It will be important that any new approach is grounded in an understanding of development economics and delivery. For this reason we will consider the need for greater detail on the role of viability assessments in shaping both development plans and decision-making.

There was approval for use of NPF4 to standardise policy on developer contributions, to guide local authorities in ensuring the way they use these is appropriate and provides clarity for investors.

One local authority respondent noted their own formulaic approach to demonstrating the need for developer contributions and arriving at a level of payment based on the costs associated with delivery of infrastructure to offset the impact of development. They suggested a similar nationwide approach could be considered to provide certainty and consistency.

There was a call for strong policy direction and guidance on the impact of contributions on the viability of proposals. It was argued that:

- A one-size-fits-all approach to contributions will not work because of the variable nature of development economics across different geographies.
- Phased introduction of new arrangements may be necessary to ensure that comprehensive infrastructure requirements for a locality can be established and can be accommodated before investment in development land takes place.

Greater use of unilateral developer obligations to allow for off-site carbon reduction to take place was proposed as a means to help deliver the overarching outcome of net-zero by 2045.

Land assembly and compulsory purchase in our future planning system will also be considered. In particular, we will explore how future national planning policies could help to promote a more proactive and collaborative approach, and how such an approach can support planning and place-making objectives.

It was suggested NPF4 should recognise the potential for greater use of Compulsory Purchase powers and should provide clear guidance on situations when the making of Compulsory Purchase Orders (CPOs) will be encouraged. This should not exclude smaller scale interventions.

It was also suggested that the CPO process should be made more straightforward to encourage local authorities to use these powers more frequently where infrastructure deficiencies are preventing necessary development from taking place.

Further detail on the practicalities of land assembly and compulsory purchase options was also requested.

Masterplan Consent Areas (MCA) will be a useful, proactive delivery tool to promote and incentivise investment in development, including new housing, and to support the delivery of local development plan strategies and particular local priorities. They will allow planning authorities to plan and enable delivery of quality development in their places; front-loading engagement, consideration of design, re-use of existing buildings, infrastructure and local assets at an earlier stage in the planning process and so placing authorities in a position of leading and enabling the planning of high quality places. Developed with community consultation, MCA schemes can be used to provide consent for specified types of development, subject to conditions in a particular area. They will be able to grant up-front consents for planned development, so adding certainty and removing much of the risk for potential investors, and supporting planned development and investment.

Points in relation to MCAs included that, along with streamlined compulsory purchase powers, these could be very powerful tools to ensure land is available and released to meet demand. It was thought that identification of MCAs could support the alignment of development processes and increase delivery of both housing and commercial developments, and could be particularly useful for large and complex mixed-use development sites by helping to de-risk a complicated development process. However

it was also suggested that a deeper understanding of how MCAs and LPPs will contribute to delivering the strategy is required.

Meaningful community consultation and contribution to development of MCA schemes was also supported.

Integrated Impact Assessment Update Report

The Update Report detailed progress since the Screening/Scoping Report that was produced in 2020 to inform the early engagement and Call for Ideas stages of the NPF4 preparation process. The Habitats Regulations Appraisal of NPF4 – Baseline Information Report was also made available as an Appendix.

Question 6: Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

There were relatively few comments on the Update Report, albeit a number of respondents expressed broad support. This including welcoming engagement with Public Health Scotland to inform the assessments.

Other comments and queries included that:

- More detail about the impact assessment process would be welcome, including whether assessments will be based on national or regional data. It was suggested that national-level data could miss or conceal local issues and that regional and locally granular data be used as far as possible.
- Flexibility will be needed, as technologies and needs will change quickly; a 'change mechanism' would be appropriate.
- Health effects must be examined. Public health considerations should be embedded into the plan making process and emerging data on the COVID-19 pandemic should be taken into account.
- It would be useful to confirm whether: assessment of developments that have a relevance to the historic environment will occur under Strategic Environmental Assessment; and how impacts from the policy requirement for preparation of Heritage Impact Assessments have been considered.
- The thinking being developed on how the supply of new homes affects the achievement of inclusive growth was queried and, in particular, how supply of deliverable housing land and new homes impacts on housing affordability.
- A National Development's lifecycle greenhouse gas emissions and reductions targets should be considered alongside the impact to the natural environment and other aspirations set out within the Position Statement.

Other comments

Question 7: Do you have any other comments on the content of the Position Statement?

Around 130 respondents provided a comment at Question 7, with many summarising their position overall or highlighting topics or concerns that have been covered elsewhere in this report. The analysis presented below only presents issues not covered elsewhere within the report.

Actions requested as a result of delays to NPF4

It was argued that the urgency of the climate emergency, the delay to NPF4 and the required increase in renewable energy generation capacity would justify interim policy guidance on renewable energy developments. It was proposed that:

- There should be immediate guidance on the planning balance being tilted in favour of the climate emergency, which should be a material consideration in all planning decisions or should be given significant weighting or “special regard”.
- There should be an urgent review of the current consenting process to address constraints.

It was also suggested that:

- Further guidance and understanding of the emerging NPF4 would be welcome. A local authority respondent noted their own second LDP (LDP2) would now be due for publication only weeks after the delayed draft NPF4.
- Clarity is needed as to how the any disparities between the second round of LDPs and the draft NPF4 will be dealt with by the Reporter.
- Until SPP comes into force, some flexibility will be required around change of use and assistance in reaching decisions based on priorities.

A further request for urgent action was that SPP should be updated to give absolute protection to ancient woodlands and hedges, and for there to be a requirement that ecological reports are carried out at a time of year when species are most readily identifiable.

National Developments

Proposals for National Developments were invited at the Call for Ideas stage of engagement on NPF4. Information on the proposals received can be found on the [Transforming Planning mapping platform](#). The Position Statement notes that the Scottish Government will consider whether proposed national developments can help to deliver on the vision of each of the key outcomes, but there is no further discussion of the selection process (other than in relation to timetable issues noted in the Update Report).

Nevertheless, some respondents referenced national developments in their response including by:

- Seeking national development status for a project.
- Providing updates on projects they had already proposed.
- Commenting on individual projects presented on the Transform Planning website.

There were also requests for further information on the process to be followed in selection and adoption of National Developments in NPF4. Comments included that:

- The assessment criteria should be transparent and robust.
- The assessment process should consider adverse impacts on biodiversity, and on local communities - for example in relation to noise.
- Comments from affected communities should be included in the assessment process.
- Early publication of candidate National Developments should be followed by consultation.

In addition, it was suggested that NPF4 should be clear that National Development status does not circumvent the need for planning permission or obligation to comply with the Habitats Regulations, or other legal requirements.

There were also concerns over possible lack of flexibility to respond to new priorities or technologies going forward.

Other issues

Other issues raised and not covered elsewhere in the report included:

- **Defining sustainability:** It was noted that the Position Statement refers to travel, tourism, rural living and locations as 'sustainable' but does not define what this means. Adding a definition of sustainable development and its agreed principles to NPF4 was proposed.
- **Explaining the hierarchy of legislation:** An organogram was suggested in order to provide a visual guide to the hierarchy of policies and actions that a community council might need to understand.
- **Protecting dark skies:** The importance of protecting dark sky areas was highlighted and it was suggested a national policy would help to protect existing un-polluted areas and reduce the existing light pollution elsewhere, thereby reducing energy consumption and delivering on the wider net-zero agenda. It was suggested to be important to extend the principle of protecting dark sky areas beyond the "dark skies parks" mentioned in NPF3.
- **Aviation safety:** It was argued to be important that aviation safety is given due consideration in relation to wind farm re-powering applications, with continued engagement between aviation and renewables stakeholders and

consenting authorities. It was also suggested that night-time aviation lighting should not be a reason to object to wind farm development, unless in a designated dark sky area.

- **Green ports:** Plans for green ports were noted, with several respondents highlighting potential candidates. It was suggested green ports are an important and complementary initiative relevant to NPF4.
- **World Heritage Site application for the Flow Country:** It was suggested that proposals for onshore wind development might have an impact on the application for World Heritage status for the Flow Country, and that those responsible for NPF4 and for the Flow Country proposal should meet to resolve priorities going forward.

Annex 1: Organisational respondents (n = 201)

Active travel-related third sector organisation or campaign group (n = 6)
Cycling Scotland
Cycling UK in Scotland
Living Streets Scotland
Paths for All
Ramblers Scotland
Sustrans Scotland
City Region or Strategic Development Planning Authority (n = 2)
Clydeplan
Edinburgh and South East Scotland City Region Deal
Community Council or Residents Association (n = 23)
Broom, Kirkhill and Mearnskirk Community Council
Crosshill, Straiton and Kirkmichael Community Council
Culter Community Council
Danderhall and District Community Council
Durness Community Council
Fintry Community Council, Dundee
Fossoway and District Community Council
Grangemouth incl. Skinflats CC
Grassmarket Residents' Association
Hillhead Community Council
Inverurie Community Council
Kemback, Pitscottie and Blebo Community Council
Kilmarnock Community Council
Leith Harbour and Newhaven Community Council
Limekilns, Charlestown and Pattiesmuir Community Council Fife
Linlithgow and Linlithgow Bridge Community Council
Monkland Glen Community Council
Muckhart Community Council
Old Aberdeen Community Council
Southside Community Council (Edinburgh)
West Kilbride Community Council
Westhill and Elrick Community Council
Woodlands and Park Community Council

Culture or Heritage Company, Association, Trust or Representative Body (n = 8)
Association of Local Government Archaeological Officers Scotland (ALGAO Scotland)
Chartered Institute for Archaeologists
Cockburn Association (Edinburgh Civic Trust)
Culture Counts
Development Trusts Association Scotland
Museums Galleries Scotland
The National Trust for Scotland
Theatres Trust
Development, Property or Land Management Company or Representative Body (n = 19)
Avison Young
Barton Willmore LLP
Elan Homes (Scotland) Ltd
Gladman Developments Ltd.
Hallam Land Management Ltd
Heriot Watt University
Homes for Scotland
McInally Associates
New Ingliston Ltd
NPL Group
Ryden LLP on behalf of Wemyss & March Estates
Savills
Scottish Land & Estates
Scottish Property Federation
Taylor Wimpey
Taylor Wimpey and Hallam Land Management Ltd
The Scottish Council for Development and Industry
Wallace Land Investments (Wallace)
WildLand Limited
Energy-related Supplier, Developer, Association or Body (n = 28)
3R Energy Solutions Ltd
BayWa r.e. UK Ltd
Belltown Power
Brockwell Energy

Community Windpower Ltd
Energy-related Supplier, Developer, Association or Body (continued)
Coriolis Energy Ltd
Drax Group
EDF
EMEC (European Marine Energy Centre Ltd)
Energy UK
Ennoviga Solar Ltd
ESB Asset Development UK Ltd
Falck Renewables Wind Ltd
Fred Olsen Renewables Ltd
Green Power
Infinergy
Muirhall Energy
Renewable Energy Systems (RES)
Scottish and Southern Electricity Networks
Scottish Power Energy Networks
Scottish Renewables
ScottishPower Renewables
Solar 2
Solar Energy
SSE Renewables
Statkraft UK Ltd.
TownRock Energy Ltd
WKN GmbH
Environment or Natural Heritage-related Third Sector Organisation or Campaign Grp (n = 17)
Aberdeen Climate Action CIC
Badenoch & Strathspey Conservation Group
Fields in Trust
Fife Communities Climate Action Network CIC
Friends of the Earth Scotland
Glasgow Calls Out Polluters
Green Action Trust
John Muir Trust

Keep Scotland Beautiful
Mountaineering Scotland
Environment or Natural Heritage-related Third Sector Organisation or Campaign Grp (cont)
RSPB Scotland
Scottish Biodiversity Information Forum (SBIF)
Scottish Environment LINK
Scottish Wildlife Trust
Teach the Future Scotland
The Association for the Protection of Rural Scotland
Woodhall, Faskine & Palacecraig Conservation Group
Greenbelt Campaign Group (n = 2)
Keep Potterton Green
Save Stepps Greenbelt Campaign Committee
Local Authority (n = 29)
Aberdeen City Council
Aberdeenshire Council
Argyll and Bute Council
City of Edinburgh Council
Clackmannanshire Council
COSLA
Dumfries and Galloway Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
Falkirk Council
Fife Council
Glasgow City Council
Highland Council
Improvement Service
Moray Council
North Ayrshire Council
North Lanarkshire Council
Orkney Islands Council
Perth and Kinross Council

Renfrewshire Council
Scottish Borders Council
Shetland Islands Council
Local Authority (continued)
South Lanarkshire Council
Spatial Planning, Health and Wellbeing Collaborative
Stirling Council
Stirling Council Planning Authority
West Dunbartonshire Council
West Lothian Council
Planning, Architecture or Housing Representative Body or Campaign Organisation (n = 12)
BEFS - Built Environment Forum Scotland
Chartered Institute of Housing Scotland
Heads of Planning Scotland (HOPS)
ICE
PAS
Planning Democracy
RIAS
RTPI Scotland
Scotland's Landscape Alliance
Scottish Alliance for People and Places
Scottish Federation of Housing Associations
UK Collaborative Centre for Housing Evidence (CaCHE)
Planning, Development, Architectural or Environmental Consultancy (n = 3)
Centre for Strategic Climate Solutions
David Bell Planning Ltd
Ristol Consulting Ltd
Public Body, Commission or Taskforce (n = 9)
Creative Scotland
Crown Estate Scotland
Historic Environment Scotland
HSE
Key Agencies Group (KAG)
NatureScot

Scottish Enterprise
South of Scotland Enterprise (SOSE)
The Coal Authority

Third sector, community or campaign organisation (n = 13)
Age Scotland
Carnegie UK Trust
Children in Scotland
Community Growing Forum Scotland via Social Farms & Gardens Scotland
Community Land Scotland
Edinburgh Airport Noise Advisory Board
Fair Planning for Glasgow
Foundation Scotland
GoBike, Strathclyde Cycle Campaign
National Park City
Play Scotland
Save Shetland
Scotland against Spin
Transport Partnership (n = 1)
Strathclyde Partnership for Transport
Transport-related Body, Association or Provider (n = 4)
Aberdeen Harbour Board
AGS Airports Limited
CoMoUK
Forth Ports Ltd
Trade Union (n = 1)
UNISON Scotland
Other Infrastructure-related Company or Representative Body (n = 5)
Mobile UK
Scottish Environmental Services Association
SRMA (Scotland) Limited trading as the Resource Management Association Scotland (RMAS)
The Metropolitan Glasgow Strategic Drainage Partnership
Viridor

Other Private Sector (n = 10)
Bourne Leisure Limited
BSW Timber Group
Cooke Aquaculture Scotland Ltd
EPC-UK
Other Private Sector (continued)
Loch Duart Ltd
MAKAR Ltd
Offsite Solutions Scotland Ltd
Scottish Sea Farms Limited
Shetland Space Centre Limited
Other Representative Body, Faculty, Network (n = 9)
Chartered Institute of Ecology and Environmental Management
CITB
CIWM
Colleges Scotland
Fisheries Management Scotland
Mineral Products Association
Royal Highland & Agricultural Society of Scotland, Edinburgh
Scottish Salmon Producers Organisation
Scottish Women's Convention
SOLACE

Annex 2: Priority policy changes being considered

A Plan for Net-Zero Emissions

- **1** Strengthening support for retaining and reusing existing buildings to maximise the use of the embodied energy of our building stock. We will consider how carbon assessments can ensure that the carbon stored in buildings is accounted for in decision making.
- **2** Making it more difficult for new developments that generate significant emissions, across the lifecycle of a development as a whole, to gain planning permission.
- **3** Supporting the use of materials with low embodied emissions, that can act as an emissions store and where the materials can be re-used with minimal re-processing at end of life of the building to avoid release of the embodied emissions.
- **4** Embedding of the National Transport Strategy 2 Sustainable Travel and Investment Hierarchies into the appraisal and assessment of development proposals as well as the proposals themselves. This will also be achieved through an infrastructure-first approach to future development.
- **5** Actively planning future development in a way that helps us to achieve zero carbon living that minimises the need to travel by unsustainable modes, for example by helping to create 20 minute neighbourhoods where achievable.
- **6** Facilitating development that is highly energy efficient and which meets greenhouse gas emissions standards, including making provision for zero carbon energy generation.
- **7** Setting out a consistent policy for meeting Section 3F of the Town and Country Planning (Scotland) Act 1997 in relation to emissions policies.
- **8** Clarifying where net-zero building approaches may allow development to proceed by offsetting emissions.
- **9** Promoting nature-based solutions to climate change, including woodland creation and peatland protection and restoration.
- **10** Integrating development with natural infrastructure, including blue-green networks, to deliver multiple benefits including carbon sequestration, community resilience and health improvement.
- **11** Strengthening our support for re-powering and expanding existing wind farms.
- **12** Updating the current spatial framework for onshore wind to continue to protect National Parks and National Scenic Areas, whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site specific assessments.
- **13** Introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen.

- **14** Setting out a more practical and outcome-focused approach to accelerating a transition to renewable and zero emissions heating in buildings, including by linking with wider policies for green and blue infrastructure and vacant and derelict land and properties.
- **15** In line with the Bank's primary mission, the Scottish National Investment Bank has the opportunity to use its investments to be part of the drive towards a just transition to net zero emissions

A Plan for Resilient Communities

- **1** Promoting innovative place-based solutions to reflect a new approach to localism, including 20 minute neighbourhoods, an infrastructure first approach and a move towards more mixed land uses to improve local areas. A stronger focus on place-based actions will also help us to adapt to long-term climate change.
- **2** Introducing an overarching principal policy that puts the needs of people and their health and wellbeing at the heart of the planning system; encouraging people to engage with decisions about their communities, providing for a more joined-up, collaborative, and participative approach, achieving better outcomes for everyone by enabling communities to shape their own places.
- **3** Minimising and mitigating environmental hazards and pollution, and embedding an evidence-based approach to the avoidance and alleviation of health impacts from new development. We will also include new policies to improve air quality alongside reducing climate change emissions.
- **4** Ensuring that the full range of policies and proposals included in NPF4 will work together to support a fairer, more inclusive and equalities-based approach to planning in the future.
- **5** Promoting places which create the conditions for healthier, more sustainable living, including by addressing the links between planning, transport, place, food and drink and other lifestyle choices, and the retail environment.
- **6** Refocusing our policies on housing on quality and place, and linking with wider housing investment so that the needs of everyone, including older people and disabled people, can be met. We expect to strengthen requirements for affordable housing provision and include policies that help to diversify delivery and reflect the future needs and aspirations of communities.
- **7** Replacing the current focus on maintaining a 5 year supply of effective housing land with a longer term perspective so that future plans can promote immediate deliverability and viability, but also proactively steer development to appropriate locations in line with the plan's spatial strategy, informed by an infrastructure-first approach. We could seek to monitor the pace of land take-up through completions and to trigger the release of additional land, in line with the development plan, when the need for additional capacity is clearly demonstrated. Housing Land Audits will help us understand programming and we are considering how they can be clearer and more consistent.

- **8** Proactively bringing forward good opportunities for quality homes in places that would benefit from them, including town centres, remote rural and island communities, vacant and derelict land and adaptation and re-use of disused properties. An infrastructure-first approach should be an integral part of site selection to assist with development viability and minimise the need for the construction of new infrastructure and its associated costs to the public and private sectors.
- **9** Promoting self and custom build/self-provided housing, co-housing and other innovative approaches to delivery, also linking with the potential for Masterplan Consent Areas. This will link with the new requirement to prepare and maintain a list of people interested in self-build introduced by the Planning (Scotland) Act 2019. We will also support purpose-built build to rent homes in contributing to meeting need and demand.
- **10** Providing a consistent national planning policy that proactively addresses the comprehensive evidence on the needs of the Gypsy/Traveller population. This could include criteria against which ad-hoc proposals for public or private permanent sites or temporary transit sites can be assessed. We will also address the specific accommodation needs of Scottish Showpeople.
- **11** Setting out clearer requirements for infrastructure to support developments and more proactively considering how it will be delivered. We will explore the level of service provision that can reasonably be expected by communities where development takes place, particularly for health and education. New policies will provide a framework for taking into account the impacts of proposed new development on infrastructure, including by prioritising areas where there is existing capacity. This will be supported by a clearer and more consistent framework for developer contributions.
- **12** Ensuring well-designed, high quality provision and long term maintenance of natural infrastructure in new development, recognising its contribution to goals for climate change mitigation and adaptation, biodiversity and health and wellbeing, including clean air, place-making and community resilience.
- **13** Promoting multifunctional blue and green networks, accessible to all, supporting active travel, recreation and habitat connections for nature. Our policies will also focus on the quality, functionality, usability, accessibility, inclusiveness, and future maintenance of green space. We will plan for allotments and community growing spaces given their benefits for health and wellbeing, community and quality of life.
- **14** We will introduce a new policy to address play and playability, covering both informal and formal play and considering spatial opportunities for play as part of wider place planning.
- **15** Promoting natural flood risk management and strengthening our policies on the water environment and drainage infrastructure to address the future impacts of climate change to build the resilience of our communities.
- **16** Reducing the need to travel unsustainably by embedding the Sustainable Travel and Investment Hierarchies into decisions about locations for change. This should guide development to places which can currently be sustainably

accessed, or have the ability to become so, with minimal cost to the public and private sectors arising from the need to subsidise public transport or invest in new infrastructure resulting from the need to rely on the private car. We will consider the accessibility and needs of different groups – for example of children and young people in accessing schools and opportunities for play.

- **17** Restricting development in flood risk areas that generate the need for additional flood risk management measures and which put pressure on drainage systems.
- **18** Align with our Capital Investment Plan in terms of the role of private capital in developing sites of strategic importance to Scotland.

A Plan for a Wellbeing Economy

- **1** Promoting a place-based approach to investment across all development plans, in line with the Infrastructure Investment Plan, priorities of the Scottish National Investment Bank, and the recommendations of the Advisory Group on Economic Recovery.
- **2** Explicitly supporting development that can demonstrate its contribution to a wellbeing economy and fair work. This could include, for example, the introduction of new requirements from investment to secure social and environmental value and the delivery of our Public Health priorities.
- **3** Creating certainty for investors whilst providing flexibility to allow the planning system to respond more effectively to market opportunities.
- **4** Facilitating new ways of working such as remote working, homeworking and community hubs, in line with our emphasis on localism and to help reduce demand for motorised travel.
- **5** Ensuring that we reflect the vision, objectives and framework of Scotland's upcoming third Land Use Strategy. We will consider how spatial planning at regional and local scales can protect and enhance the multiple benefits that can be gained from our land including food production and access to local markets.
- **6** Reflecting any development and infrastructure needs arising from changes to wider markets, linking with our proposals for strategic freight connectivity.
- **7** Continuing to grow Scottish aquaculture in a way which balances production with environmental quality. This could include criteria for assessing aquaculture proposals that can be consistently applied and which are sufficiently flexible to respond to changes in practice.
- **8** Revisiting the interface between terrestrial and marine planning to ensure our policy properly reflects more recent developments in marine planning and associated research and evidence.
- **9** Encouraging the expansion of tourism and associated infrastructure in an inclusive and sustainable way to ensure local communities have a share in tourism benefits, and safeguard environmental and community assets. We will explore how relevant tourism management considerations can be built into decisions on future development – for example by supporting developments

that redistribute tourist uses and alleviate pressure on the capacity of sensitive areas. We will also build on investment through the Rural Tourism Infrastructure Fund.

- **10** Providing greater flexibility for housing development that provides accommodation for rural businesses.
- **11** Tackling the impact of short term lets in pressured areas by providing a framework for decision making on planning applications.
- **12** Actively enabling development that supports expansion of the creative sector.
- **13** Reflecting the importance of cultural facilities in different types of places, such as city and town centres and more rural communities and to stimulate more creative approaches to place-making and regeneration, for example in temporary uses of vacant spaces or in animating public spaces.
- **14** Protecting existing cultural assets from inappropriate development including through the Agent of Change principle.
- **15** Promoting the broader circular economy agenda and considering how it can improve our approach to place-making more broadly, including by making best use of existing buildings, and by prioritising waste prevention through innovation in design and construction. We will also look to ensure that, where feasible, existing materials are salvaged and reused or recycled.
- **16** Encourage new buildings to connect to existing heat networks where located in a Heat Network Zone, wherever feasible; and encouraging applications for energy from waste facilities to provide a connection to a heat network, taking into account the practical considerations involved.
- **17** Enabling the development of future zero carbon infrastructure in a way that supports wider spatial objectives, including mixed use and sustainable connectivity. This could include larger scale facilities as well as small scale interventions to support communities and households to make the transition to a circular economy.
- **18** Updating our policies on fossil fuel extraction to reflect our climate change objectives and wider energy policy. Policies will mitigate certain environmental and health effects of minerals developments. We will also reflect wider policies on unconventional oil and gas and fossil fuels and confirm that we do not support applications for planning permission for new commercial peat extraction for horticultural purposes.
- **19** Supporting heat network opportunities that can safely utilise former deep mining areas.
- **20** Reviewing our approach to calculating and maintaining a suitable landbank for aggregates that reflects the 10 year development planning timescale.
- **21** Decarbonising our transport system in relation to car and light commercial vehicles, Scotland's passenger railways and scheduled flights within Scotland.
- **22** Setting out the key considerations to be taken into account when considering proposals for strategic low carbon transport infrastructure and

ensuring that local development plans factor in strategic transport connectivity as part of their spatial strategy.

- **23** Supporting the roll-out of digital infrastructure across Scotland in a way which allows planning authorities to manage its impact. We will encourage the redevelopment of existing infrastructure, including retrofitting and shared use of facilities.
- **24** Introducing stronger requirements for new housing and business developments to build in connectivity and connecting the planning of future development with existing and future digital infrastructure capacity.
- **25** Providing a framework to manage the impacts of development on digital networks.
- **26** A new values-led approach to Inward Investment that will focus our efforts to build a technologically enabled, net zero economy with the principles of fair work and sustainable, inclusive growth at its heart.

A Plan for Better, Greener Places

- **1** Embedding the Place Principle throughout NPF4.
- **2** Promoting the value of good design in creating great places. We will continue to reflect the 6 principles of successful places and consider the extent to which they can be developed further to reflect wider priorities, such as climate change, biodiversity and public health, including the health benefits from clean air and access to nature and quality green space. We will also consider scope to provide a framework for bringing forward Masterplan Consent Areas within this context.
- **3** Embedding the use of the Place Standard Tool to reflect the importance of public involvement in a collaborative approach to place-making and the links between place, environment, health and wellbeing.
- **4** Refreshing 'Designing Streets' to bring it up to date, clarify specific issues such as inclusive and sustainable design, and strengthen its applications, particularly in the context of 20 minute neighbourhoods.
- **5** Broadening the mix of uses in town centres in the future. As part of this, we will look at how our policies can help to deliver the Town Centre First Principle and associated work on regeneration as a key contributor to achieving a new emphasis on localism and sustainability. We will promote new opportunities to increase town centre living, for example by stimulating the re-use of empty properties and gap sites and actively promoting homes for people of all ages, with greater recognition of the contribution these can make to housing requirements whilst following the agent of change principle. We will also look at how our policies can respond to current and future expected changes to the retail sector and harness the energy of the cultural heritage, historic environment and arts economy, including the evening/night time economy, to support town centre regeneration.

- **6** Reconsidering the evidence, monitoring and appraisal required to inform spatial strategies in development plans, such as town centre health audits and strategies, transport and emissions modelling of land use options.
- **7** Aligning the strategy with the Land Use Strategy and identifying opportunities to align emerging Regional Spatial Strategies with future Regional Land Use Partnership Frameworks.
- **8** Prioritising the use of vacant and derelict land ahead of greenfield land through a 'brownfield first' approach. As part of this, we will consider the various definitions of vacant and derelict land, buildings at risk and their respective implications for planning policies.
- **9** Strongly incentivising the imaginative and sustainable re-use of vacant and derelict land and buildings by highlighting the wide range of potential temporary and permanent uses it could support and providing a positive policy framework for achieving long term positive outcomes.
- **10** Promoting a plan-led approach to re-use and remediation of sites, linking with wider delivery tools such as design briefs and local place plans. We will consider the evidence required to inform spatial strategies as part of this.
- **11** Actively encouraging sustainable, innovative and low carbon development and re-use of existing buildings or vacant and derelict land.
- **12** Tackling the challenges of viability arising for some types of development on vacant sites, by considering how plans can be supported by a wide range of delivery mechanisms. We will look at, for example, how we can promote proactive land assembly to enable the re-use of land and disused buildings.
- **13** Updating our green belt policy to provide greater clarity on acceptable uses whilst also recognising its role as part of multifunctional natural infrastructure.
- **14** Proactively rebuilding the resilience of rural communities and economies by enabling well designed, sustainable development. This will include policies to strongly support rural investment and diversification and enable the development of essential infrastructure for rural areas including affordable housing. As part of this we will take into account the specific circumstances of island communities.
- **15** Strengthening the links between development proposals and wider sustainable land use objectives, contributing to the outcomes of Scotland's Environment Strategy. This includes reframing policy to reflect the fundamental role of our natural environment and biodiversity in providing essential natural services and benefits for our economy, health and wellbeing, and climate resilience. We will explore opportunities to ensure that our approach to using and managing natural assets is sustainable and regenerative, restoring and enhancing our stocks of natural capital.
- **16** Strengthening the consideration given to the likely effects of development on carbon dioxide (CO₂) emissions where peat and other carbon rich soils are present.
- **17** Securing positive effects for biodiversity from new developments. We are developing ambitious new proposals which deliver positive outcomes for

biodiversity from development without the need for overly complex metrics, and will consider how they can support wider approaches to natural infrastructure.

- **18** Strengthening policy on woodland protection and creation in association with development, aligned with new provisions on forestry and woodland strategies.
- **19** Clarifying our policies on locally important built and natural assets where required.
- **20** Given the new requirements in the Planning (Scotland) Act 2019 to support the repopulation of rural Scotland, we will consider whether our policies on wild land need to change, while ensuring effective safeguards for our natural environment and landscapes.
- **21** Maintaining, strengthening and clarifying our policies for the historic environment to ensure planning policies align with the vision set out in our Historic Environment Strategy and the operational policy framework in HES's Historic Environment Policy for Scotland.
- **22** Enabling the continuing use, or re-use where appropriate of historic buildings given their importance in making sustainable use of embedded carbon as part of a circular economy.
- **23** Considering whether Heritage Impact Assessments should be mandatory for all listed building and conservation area applications.
- **24** Supporting development and infrastructure needed to realise the potential of the blue economy and coastal communities, including opportunities to enhance natural infrastructure. We will also factor in long term coastal vulnerability and resilience in order to future-proof development decisions.
- **25** As part of delivery against the missions set for it, the Scottish National Investment Bank can support improving places and regeneration in order to reduce inequality, and improve opportunities and outcomes for people and communities through its investment activity.

Annex 3: Abbreviations used

Abbreviation	Definition
CCS	Carbon Capture and Storage
EIA	Environmental Impact Assessment
EV	Electric Vehicle
HES	Historic Environment Scotland
HEPS	Historic Environment Policy for Scotland
HLA	Housing Land Audit
HSCP	Health and Social Care Partnership
LDP	Local Development Plan
LPA	Local Planning Authority
LPP	Local Place Plan
MCA	Masterplan Consent Area
NMPi	National Marine Plan Interactive
NPF4	Fourth National Planning Framework
NTS2	National Transport Strategy 2
PAN	Planning Advice Note
RLUP	Regional Land Use Partnership
RSL	Registered Social Landlord
RMP	Regional Marine Plan
RSS	Regional Spatial Strategy
SEPA	Scottish Environment Protection Agency
SPP	Scottish Planning Policy
STPR2	Strategic Transport Projects Review 2
SuDS	Sustainable Drainage System



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