

National Planning Framework 4

Explanatory Report: November 2022

November 2022

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Purpose of Explanatory Report

This Explanatory Report fulfils the requirement in Section 3CA of the Town and Country Planning (Scotland) Act 1997 for Scottish Ministers to lay before the Scottish Parliament an explanatory document which sets out:

- the consultation undertaken;
- a summary of representations received; and
- the changes made to the Draft as a result of the consultation.

This report sets out an overview of the three rounds of engagement undertaken since 2020: the Call for Ideas (2020), the Position Statement (2020) and the Draft NPF4 (2021). Further detailed resources on each of these engagement stages are available at www.transformingplanning.scot.

The main focus of this Explanatory Report is to set out the changes made between the Draft NPF4 and the Revised Draft NPF4 which has now been laid in the Scottish Parliament.

The sections in this report correlate to the structure, layout and policy numbering contained within the Draft NPF4. This allows easier read across to the Analysis of Responses Report which provides an overview of the responses received from stakeholders from the consultation.

Each section covers a summary of the responses received (from the Analysis of Responses Report), a high level overview of the key changes, and then a table outlining further detail on specific changes, and the reasoning for those.

These tables include comments from stakeholders, as well as those made through responses from Parliamentary Committees and from the UK Climate Change Committee.

Consultation responses contained a very large volume of evidence and information. This report does not seek to answer every individual point that has been considered in the drafting of the Revised Draft NPF4. It also does not record where support was given for elements of the Draft. Instead it focuses on setting out the reasoning for the main areas of change, and justification for areas where change was not considered necessary.

NPF4 has a lot of cross cutting issues. Some points are made in more than one section of the Analysis of Responses Report. We have not repeated points more than once in the Explanatory Report but have put them in the most logical themed section. We have also set out commentary on many of the more general and cross cutting issues in the General Changes section to reduce repetition.

Process

Consultation undertaken

The Scottish Government has been committed to a co-production approach to developing NPF4, listening carefully to the needs of all stakeholders throughout the process. That included following up and addressing many issues raised by the Scottish Parliament during the course of the Planning Bill.

Consultation to inform Draft NPF4

Two rounds of extensive engagement were carried out to inform the Draft NPF4:

- **Call for Ideas**

- The Scottish Government sought early views on NPF4 through a 'Call for Ideas', which ran from January to April 2020. Stakeholders were invited to consider Scotland in 2045 and reflect on planning policy changes and National Developments needed to get us there.
- The Call for Ideas was backed up with extensive stakeholder engagement and a roadshow around Scotland to hear what people had to say, with provisions of supporting resources and policy information notes:
 - 180 people participated at our roadshow workshops.
 - We also spoke to around 100 people at our drop in sessions across the country.
 - nearly 350 written responses were received.
- '2050 Think Pieces' - we asked planning stakeholders to provide 'think piece' contributions on Scotland 2050 to stimulate discussion and think about priorities for NPF4.
- There was strong support for NPF4 to be radical with many seeing it as a key opportunity for change.

- **Position Statement**

- In November 2020, we published a [Position Statement](#) which set out an overview of likely key challenges, opportunities and potential policy changes, having reflected on the wealth of information and views we had received already. It also reflected on the impacts of COVID-19 and what NPF4 can do to help societal and economic recovery.
- We also commissioned PAS to support communities plus children and young people to engage in the development of NPF4. The outputs are available [online](#).
- During the Position Statement consultation period, the Royal Town Planning Institute held 4 roundtable sessions to discuss some key themes:
 - [Post Covid Recovery](#)
 - [20 Minute neighbourhoods](#)
 - [Achieving net zero](#)
 - [Delivering good quality development](#)
- We consulted on the Position Statement and received over 250 responses.

- There was broad support for the general direction of NPF4, the ambition on climate change, the focus on the place principle and the focus on 4 key outcomes.

- **Regional Spatial Strategies**

- We also undertook extensive collaborative work with local authorities, working in regional groupings, to share ideas and prepare indicative Regional Spatial Strategies which formed the basis of the spatial strategy in the Draft NPF4.

Consultation and Engagement on Draft NPF4

Legislation requires a period of Parliamentary scrutiny of up to 120 days from the date that it is laid before Parliament. The Draft NPF4 was published for consultation between 10 November 2021 and 31 March 2022.

- **Engagement during the Consultation**

Alongside Parliament's scrutiny – and in accordance with our [Participation Statement](#) we carried out a further period of public consultation and extensive stakeholder engagement, encouraging everyone to get involved. The [Programme for Engagement](#) included:

- [Community Grant Scheme](#) – £250 grants were offered to community groups to help them engage – 5 grants have been issued.
- [Open invitation events](#) gave stakeholders the opportunity to discuss NPF4 and encourage participation in the formal consultation. [Nine events](#) in total were held (one on each of the 4 policy themes and one on each of the 5 Action Areas), attended by over 100 people.
- [Equalities roundtable](#) aimed at promoting responses to the consultation, discussion was held in March with a range of organisations, around 12 organisations attended.
- [Roundtable discussions](#) were hosted by the Royal Town Planning Institute on business, energy, environment and housebuilding during February.
- [Scottish Youth Parliament](#) workshop was held at the Gathering in February.
- Worked with [PlayScotland](#) to support responses from children and young people's perspectives, two workshops hosted.
- Discussions with [community groups](#) – including 2 events hosted by PAS at the end of the consultation period, with over 50 participants.
- [Resource information online](#) to help people digest – included presentations, policy background notes, digital narratives, and all the evidence received through Call for Ideas and Position Statement.
- [Publication/Notification of the consultation](#) – we:
 - advertised through our [e-alert and twitter accounts](#) and sent [emails to over 300 organisations](#) alerting them and asking them to publicise through their networks.
 - asked the Improvement Service to forward information on the consultation to their [Community Council Liaison Network](#). They also published an article on their website.
 - wrote to the lead partners of the NPF3 National Developments that were not being re-proposed, and to community councils where they could be identified.

- **Public consultation**

- The written public consultation was launched on 10 November 2021 and closed on 31 March 2022.
- The consultation asked 70 open questions.
- The consultation responses are available [online](#), where consent has been given to publish the response.
- Following the consultation and the end of the Parliamentary scrutiny process, we commissioned independent consultants to analyse the responses.
- In total 761 responses were analysed, with 539 responses from organisations and 222 from individual members of the public. Late responses were considered but not covered within the Analysis Report.
- The Analysis Report is also available online. The report provides an executive summary and sets out some general themes raised by respondents, followed by a question-by-question analysis of the comments made to the main consultation. Summaries of Representations from the Analysis Report are provided within this Report.
- There are a wide range of views on NPF4. However, the vast majority of people who have engaged in the draft NPF4 welcome its aims and ambition. Their comments focus on how we can best achieve those outcomes, rather than asking for a change of direction.
- The Analysis Report notes that as with any public consultation exercise, it should be noted that those responding generally have a particular interest in the subject area and the views they express cannot be seen as representative of wider public opinion.

- **Climate Change Committee (CCC)**

A [letter from the Climate Change Committee Chief Executive](#) was also received, sent to the Minister for Public Finance, Planning and Community Wealth on Draft NPF4.

Key messages from the CCC “The broad vision of NPF4 is generally compatible with advice from the Climate Change Committee. The plan also shows welcome progress on recommendations that the CCC has made over the past two years.

- Infrastructure decisions made today will substantially determine the achievement of the statutory climate goals in years to come. The CCC welcomes, therefore, the alignment between NPF4 and the Infrastructure Investment Plan.
- NPF4 focuses more on the vision for Scotland than on the types of planning applications that should or should not be supported. Much will rest on local implementation, so local policies and development plans must be well-aligned with the new Framework. It is unclear how the Scottish Government will ensure compliance with NPF4.”

Parliamentary scrutiny

The Draft NPF4 was laid in Parliament on 10 November 2021 for the Parliamentary scrutiny period of 120 days.

Timeline overview, further details below

25 January 2022	Evidence Session - Planning	LGHP
25 January 2022	Evidence Session – Health	HSCSC
1 February 2022	Evidence Session - Housing	LGHP
	Evidence Session - Energy	NZET
8 February 2022	Evidence Session - Local Government issues	LGHP
	Evidence Sessions – Transport & Natural Environment, Waste Management and the Circular Economy	NZET
9 February 2022	Evidence Session – Rural issues	RAINE
22 February 2022	Committee Meeting – agreement to send letter	HSCS
	Cross Party Group on Sport	
23 February 2022	Letter from the RAINE Convener to the Convener of the Local Government, Housing and Planning Committee	RAINE
24 February 2022	Letter from the HSCSC Convener to the Convener of the Local Government, Housing and Planning Committees	HSCSC
4 March 2022	Letter from the NZET Convener to the Convener, Local Government, Housing and Planning Committee	NZET
	Committee Report	LGHP
19 April 2022	Debate on motion S6M-03985, on behalf of the LGHP Committee	Meeting of the Parliament

Local Government, Housing and Planning Committee (LGHP)

This was the lead Committee in the consideration of Draft NPF4. Evidence Sessions held by the Committee provided further insights on views on key issues these covered:

1. Planning (RTPI Scotland, Built Environment Forum Scotland, Planning Democracy, Royal Incorporation of Architects in Scotland, Planning Aid for Scotland) at the session held on 25 January 2022
2. Housing (Association of Local Government Chief Housing Officers, Scottish Land Commission, Homes for Scotland, Scottish Property Federation, Scottish Housing with Care Task Force) at the session held on 1 February 2022
3. Local Government issues (Heads of Planning Scotland, RTPI Scottish Young Planners' Network, Glasgow City Council, Convention of Scottish Local Authorities, South Ayrshire Council, Aberdeen City Council, Shetland Islands Council) at the session held on 8 February 2022

The Local Government, Housing and Planning Committee's Report on the draft National Planning Framework 4 (March 2022)

The Committee welcomed NPF4 and its ambition for Scotland. To best deliver on these ambitions the Committee highlighted a number of key areas, noting an overarching issue is resourcing and the capacity of the current planning system to deliver on the aims of NPF4.

- Comments on use of language, detailed wording and the priority or weight to be given to different policies in NPF4.
- Support was expressed by the Committee for the prominence given to the climate emergency in NPF4, and that it would also welcome the Scottish Government's reflections on the concerns expressed by the Climate Change Committee and in particular, how NPF4 will match ambition with action.
- The Committee raised important points around key policy areas, including 20 minute neighbourhoods, renewable energy, town centres and housing numbers.
- The Committee also commented on the importance of monitoring and evaluation. This is an important part of the planning system, reflected in the changes we are making to Local Development Plans (LDPs) to be informed by thorough 'evidence reports'. And it is also in how we are moving to a more outcomes-focused performance management system for planning.

Net Zero, Energy and Transport Committee (NZET)

The Net Zero, Energy and Transport Committee also considered the Draft NPF4, taking into account responses to the call for written views, led by the LGHP Committee and also took evidence at two meetings in February 2022.

It took evidence on the following issues:

- Energy, and in particular renewables and heat in buildings and homes;
- Transport and active travel;
- The environment and biodiversity; and
- Waste management and the circular economy.

On 4 March 2022 the Convener, Dean Lockhart MSP, sent a [letter](#) to the Convener, Local Government, Housing and Planning Committee, setting out the NZET Committee's views and suggestions.

Rural Affairs, Islands and Natural Environment Committee (RAINE)

Evidence Sessions held by the Committee on 9 February 2022 with Mairi Gougeon MSP, Cabinet Secretary for Rural Affairs and Islands, and Tom Arthur MSP, Minister for Public Finance, Planning and Community Wealth, they were accompanied by Scottish Government officials: the Chief Planner, the Head of Planning Transformation, the Branch Head of Environment and Natural Resources, the Head of Aquaculture Development and the Head of Rural Economy and Communities Division.

The evidence session raised a number of rural issues:

- Rural engagement to develop the draft, opportunities to engage in the consultation and 20 minute neighbourhoods/rural and island context;
- Rural housing;
- Accessibility of rural areas/transport;
- Infrastructure – using existing infrastructure;
- Growth of rural populations;
- Homeworking (digital infrastructure)/learning from the pandemic;
- How the islands fit with Action Areas;
- Fuel poverty; and
- Just transition.

On 23 February 2022 the Convener Finlay Carson MSP sent a letter to the Convener of the Local Government, Housing and Planning Committee, setting out the RAINE Committee's scrutiny of Draft NPF4.

Health, Social Care and Sport Committee

Evidence was also taken at the Health and Social Care Committee meeting on 25 January 2022 from the Improvement Service, University of Edinburgh and Public Health Scotland. The Committee noted the significant impacts of planning on health and wellbeing, both positive and negative, and recommended that this is highlighted in both NPF4 and its associated guidance on local development planning. Local elected member training was also recommended.

On 24 February the Convener, Gillian Martin MSP sent a letter to the Convener of the Local Government, Housing and Planning Committee, setting out the Committee's scrutiny of Draft NPF4.

Cross Party Group on Sport, 22 February 2022

Attended by the Minister for Public Finance, Planning and Community Wealth, who presented on the Draft NPF4, heard views of the Group and answered questions.

Debate

On 19 April 2022, MSPs debated and agreed motion S6M-03985, in the name of Ariane Burgess:

“That the Parliament agrees that the Local Government, Housing and Planning Committee’s 4th Report, 2022 (Session 6), National Planning Framework 4 (SP Paper 149), on the Scottish Government document, Scotland 2045: Our Fourth National Planning Framework, the letters from the Health, Social Care and Sport Committee, Net Zero, Energy and Transport Committee and Rural Affairs, Islands and Natural Environment Committee included within that report and the Official Report of the Parliament’s debate on the report and letters, should form the Parliament’s response to the Scottish Government on the proposed framework.”

Impact Assessments

A number of statutory and non-statutory assessments informed the preparation and finalisation of NPF4 and we invited comments on our [Integrated Impact Assessment \(IIA\) Reports](#) alongside the Draft NPF4.

Representations on the IIA are also considered in the Analysis Report.

A Post-Adoption Statement that sets out how the assessment findings, as well as the consultation responses received, have informed the development of the final Framework, will also be published.

Changes to Draft NPF4

Summary of Changes in Revised Version

Figure 1: Summary of Changes in Revised Version

	Draft	Revised version
PART 1 National Spatial Strategy for Scotland 2045		Stronger overview and narrative.
		Focus on outcomes now upfront with clear integration on how these will be achieved through policies, the spatial strategy and National Developments.
	4 themes (Sustainable, Liveable, Productive and Distinctive Places)	3 revised themes: sustainable, liveable, productive. Distinctive Places now incorporated into the other 3 themes which more closely reflects the 3 pillars of sustainable development: environment, social and economy. (See Figure 2)
	Spatial Principles	Reordered and adjusted <ul style="list-style-type: none"> ○ Tightened up explanations and cross referencing more explicit throughout ○ Moved from ‘balanced development’ to ‘rebalanced’ development ○ Emphasised that compact growth is particularly relevant to urban areas ○ Reflected the importance of rural development alongside this.
	Action Areas	Action Areas – refined, focus on context, challenges and delivery (Detail goes to Revised NPF4 Annex C). <ul style="list-style-type: none"> ○ refocused as regional spatial priorities ○ focus on context, challenges, priorities and delivery ○ clearer direction on the distinct challenges facing rural and island communities ○ moved detail to annex ○ taken on board detailed comments and additions

Changes to Draft NPF4 – Summary of Changes

	Draft	Revised version
		<p>Updated mapping</p> <ul style="list-style-type: none"> ○ Removed spatial strategy map and action areas schematic ○ Replaced with spatial strategy map based on strategies from 5 action areas. <p>Referencing of key SG plans, programmes and strategies and use of schematic (See Table 1 in Revised NPF4) to illustrate how the different elements of NPF4 come together at different scales. Clear links and referencing shown between NPF4 and other key SG plans, programmes and national strategies.</p>
<p>PART 2</p> <p>National Developments (NDs)</p>	<p>18 National Developments including statements of need</p>	<ul style="list-style-type: none"> • No change to the number of National Developments, but refinements have been made, including adjustments to the description and classes (including occasional removal or addition of classes). The refinements have not altered the overall findings of the lifecycle greenhouse gas emissions assessment. • National developments have been reordered and renumbered under the 3 themes (see Figure 3). • National development summaries have now been embedded within the spatial strategy, with the statements of need moved to Revised NPF4 Annex B. • Numbering and amendments for clarity are reflected on the revised National Developments map. Smaller maps for some of the National Developments have been revised for consistency.
<p>PART 3</p> <p>National Planning Policy</p>	<p>Universal Policies</p>	<p>Removal of Universal Policies and priority focus moved to the climate emergency and nature crisis. Intent of draft universal policies retained but reordered or re-presented across the document.</p>
	<p>4 themes</p>	<p>Reordered under the 3 themes (see Figure 4). Policies restructured and policy intent, policy outcomes and links to</p>

Changes to Draft NPF4 – Summary of Changes

	Draft	Revised version
		relevant spatial principles and other policies are now clearly set out. Detailed policy amendments in response to representations/ evidence (see Part 3).
	Language	Work on language, certainty and clarity, internal consistency of wording/policy approach.
	Use of 'should'	Changed to consistent use of: 'will be supported'/ 'will only be supported'/'will not be supported'. Further advice added to the Revised NPF4 'How to Use this Document', Annex A.
PART 4 Delivering Our Spatial Strategy	Outline provided of how we will deliver NPF4	Publication of a standalone Delivery Programme. The Delivery Programme will be updated throughout lifespan of NPF4 (see Part 4).
PART 5 Annexes	3 Annexes	6 Annexes: <ul style="list-style-type: none"> - Removal of outcomes annex. Detail supplemented and moved within main text. - New Revised NPF4 Annex B covering National Development Statements of Need (previously within main body of text). - New Revised NPF4 Annex C covering the detail of the Spatial Strategy action areas (previously within main body of text). - New Revised NPF4 Annex D covering Six qualities of Place (previously within main body of text) . - New Revised NPF4 Annex A covering 'How to Use this Document'. (Text supplemented with additional narrative including how NPF links to other plans). - Updates to Annexes on Housing numbers (Revised NPF4 Annex E) and Glossary of definitions. (Revised NPF4 Annex F) - New Revised NPF4 Annex G on Acronyms

General Changes

Summary of Representations

A number of general comments referred to the framework as a whole. These are summarised below and the following table documents changes made.

The Analysis Report identified four general themes not specific to a particular consultation question:

- Structure of NPF4
- Strategic hierarchy and relationships
- National Planning Policy Handbook (covered under Part 3)
- Language used across NPF

Structure of NPF4

Summary of representations

Respondents commented on the relationship between the different parts of the draft document, as well as its overall structure. Suggested changes or additions to the document included: setting out the interconnections across the national spatial strategy, National Developments and policy handbook; the use of schematics that illustrate how the different elements of NPF4 come together at different scales through a place-lens; and adding a statement in the early part of the document on how it complies with the various statutory requirements of the Town and Country Planning (Scotland) Act 1997 (as amended), and other related legislation.

Overview of changes

The structure of the document has been revised to better connect the various sections and to provide clarity on the vision and strategy. Changes to improve usability have been made including the addition of an Annex to provide further and more detailed information on how to use the document.

The document has been restructured under 3 themes rather than 4, with Distinctive Places being removed (and policies under this heading redistributed), to focus on the three pillars of sustainable development: environment, people and economy. The narratives for each theme have been strengthened and additional detail on how the strategy will meet the statutory outcomes has been added. The Regional Spatial Strategies have been sharpened, more clearly focusing on the main issue for each area, including the main priorities for action and the relevant National Developments.

The policy section (now Part 2) has also been re-presented to separate instructions for LDPs from development management policy. Extra sections have been added to show key connections to other parts of the document.

The spatial principles have been strengthened and better reflected throughout the document, particularly through highlighting their impact in each themed policy in Part 2 and each National Development.

A diagram has been added to show links between the national outcomes and UN Sustainable Development Goals, the spatial principles, National Developments and policies, plus wider Scottish Government plans and strategies.

Issues raised and changes made

Issue	Change	Reason/Comments
<p>Comments on the overall 'fit' of the document and how the different parts sit together.</p>	<p>The section setting out 'How to use this Document' has been moved to an Annex (A) and supplemented with additional content. The text in the Draft focused on the structure of that publication. The revised version provides information on the role of the NPF and how it fits with other plans and clarifies the varying roles of each section. It underlines our commitment to a plan-led planning system and the primacy of the development plan in decision making. The 'How to Use this Document' Annex makes clear NPF4 should be read as a whole, as it represents a package of planning policies to guide us to the place we want Scotland to be in 2045.</p>	<p>To respond to stakeholder views by providing additional detail and clarification.</p>
<p>Call for a greater focus on the statutory outcomes.</p>	<p>The Act requires NPF to set out a statement of how development will contribute to each of the 6 statutory outcomes. In the Draft we provided a high level summary within an Annex. In the revised document we have strengthened the messages on each outcome, further</p>	<p>To respond to stakeholder views by providing additional detail and clarification.</p>

Changes to Draft NPF4 – General Changes

Issue	Change	Reason/Comments
	highlighting how we can deliver each outcome. The statements have also been embedded within the main document to provide greater prominence and to help link the spatial strategy with relevant policies.	
Themes - there was some feedback that the Distinctive Places theme was the least coherent, and that the concept is embedded in planning decisions.	We have made a shift from 4 themes to 3, removing Distinctive Places. The new structure is intended to ensure that the value of special distinctive places, as a place-based approach, cuts across all the themes, rather than as a separate issue. The policies within this section have been redistributed to reflect the three remaining themes. (See Figure 2)	To respond to stakeholder views by presenting a more logical story, based around the three pillars of sustainable development: environment, people and economy.
Concern the Draft NPF4 is currently not as well framed as many LDPs, does not appear to have adopted good practice that has emerged through the examination of LDPs by the SG's Planning and Environmental Appeals Division.	Wording has been tightened across the policies and consistency improved.	To respond to stakeholder views. We have liaised with colleagues in the Planning and Environmental Appeals Division (DPEA) who have provided advice on clarity of language in the policy wording and relationships between policies, based on their experience examining LDP policies and their role in the appeals process.
Call to set out the interconnections across the national spatial strategy, National Developments and policy handbook. It was suggested that it would be helpful if the framework could be presented in way that clearly articulates the interconnectivity between these, and what this	New schematic diagram added to illustrate how the different elements of NPF4 come together at different scales and the interconnections. Spatial principles better reflected and referenced throughout document including for thematic policies and National Developments.	To respond to stakeholder views and further strengthen key messages throughout the document, creating better flow, and greater consistency.

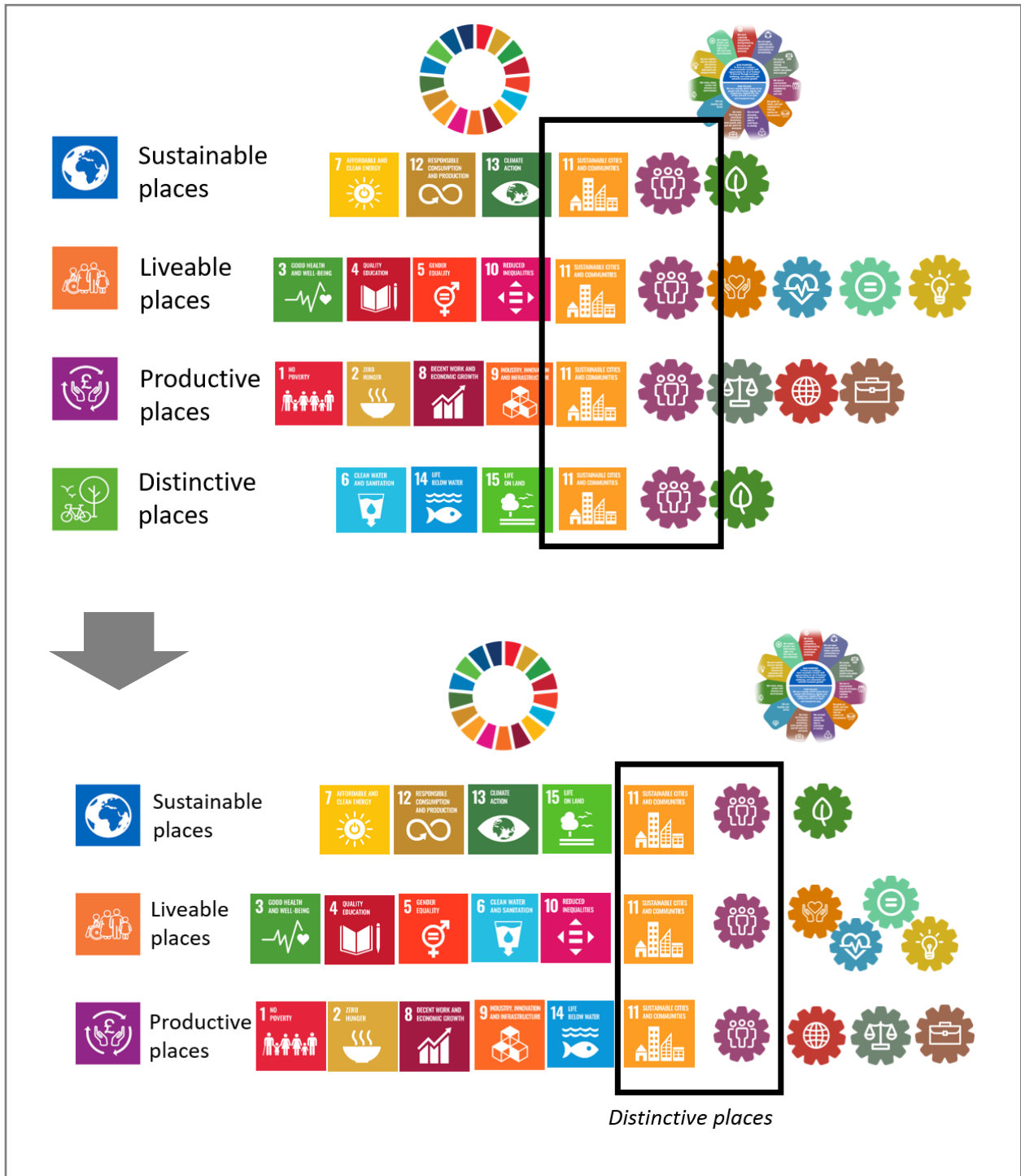
Changes to Draft NPF4 – General Changes

Issue	Change	Reason/Comments
means for planning processes.	Key policy connections also identified for each policy in Revised NPF4 Part 2.	
Call for use of schematics to illustrate how the different elements of NPF4 come together at different scales through a place-lens to support the Place Principle.	No change.	The use of graphics can be a powerful tool and post approval we can take stock of any graphics and visuals that stakeholders would find useful whilst also making use of existing graphics from other partners. These can be accessed via websites, and updated throughout the lifetime of the NPF, which we believe is more practical than embedding within the document.
Call for stronger framing of the Place Principle throughout the document.	References to the Place Principle have been strengthened throughout. We have set out an expectation that National Developments will be exemplars of the Place Principle; highlighted that LDPs should be place based and created in line with the Place Principle; clarified that our policies on design and local living intend to help delivery of the Place Principle; and we have added a Glossary definition for clarity.	To respond to stakeholder views and clarify expectations of the planning system in implementing the Place Principle.
Calls for a statement on how NPF4 complies with the various statutory requirements of the Act and other related legislation.	No change.	This is addressed by the statements on the statutory outcomes. It was not considered appropriate to add multiple references to all the Planning Act's requirements and those of other related legislation in the development plan.
Call to ensure NPF4 locks-in climate positive behaviours.	A new overarching Policy 1 in the revised NPF4 has been added to set out that the contribution of	To respond to the UK Climate Change Committee.

Changes to Draft NPF4 – General Changes

Issue	Change	Reason/Comments
	development proposals to the global climate emergency and nature emergency should carry significant weight in planning decisions.	
How will policy be delivered and resourced including skills?	No change.	The delivery of NPF4 is a shared responsibility of all stakeholders. To support this, a Delivery Programme has been published alongside the Revised Draft version which sets out key actions to implement its priorities and policies.

Figure 2: Shift from 4 themes to 3



Strategic hierarchy and relationships

Summary of representations

A number of respondents commented on the inter-relationships between NPF4 and a range of other national, regional or local strategies or plans. A general observation was that NPF4 misses an opportunity to clearly state where it sits within the overall context of other Scottish Government plans and strategies.

At a national level, it was noted that the aims of NPF4, chiefly the just transition to net zero, adoption of place-based working and delivery of a wellbeing economy, are shared across a number of current and emerging strategies and statutory documents.

Strategies referenced included the National Strategy for Economic Transformation, Heat in Buildings Strategy, Town Centre Action Plans, Land Use Strategy and the forthcoming Biodiversity Strategy.

Being clear about the relationship between NPF4 and these related strategies was seen as offering the best chance of success, with the quality of alignment seen as key. It was suggested that this is especially important when it comes to the successful delivery of those individual planning policies which cross over into other areas and where strategies have complementary aims.

Overview of changes

The narrative for each theme now covers links and relationships with other national strategies and policies. A new schematic (Table 1 in Revised NPF4) has also been added to show key policy links. The new 'How to Use this Document' Annex covers the roles of NPF and other plans in the planning system (including Regional Spatial Strategies, Local Development Plans and Local Place Plans) and also references Regional Transport Strategies.

Issues raised and changes made

Issue	Change	Reason/Comments
Lack of clear explanation of where NPF4 sits within the overall context of other Scottish Government plans and strategies.	Revised NPF4 aligns with all relevant Scottish Government plans and strategies.	To respond to stakeholder and committee views. Over the lifespan of the NPF, new strategies will emerge and others may be superseded. The NPF4 Delivery Programme includes detail of the relationship with other key national plans and strategies.
Consider what more could be done to enable users of NPF4 to better understand links to other strategies and the synergies between them, so that they can take them into account in decision making.	Table 1 in Revised Draft NPF4 shows at a glance how all the themes, spatial principles, National Developments and policies fit together as well as how they relate to wider strategies.	

Changes to Draft NPF4 – General Changes

Issue	Change	Reason/Comments
Calls for more cross referencing between policies.	We have added references to a number of key policies and strategies in Revised Draft NPF4 Part 1, under the narrative for each theme. These updates outline the role that these strategies play and how they link and can help deliver that theme. The Revised Draft NPF4 'How to Use this Document' Annex explains the status of NPF4 as part of the development plan in the planning system.	
The relationship between NPF4 and a number of other policies and strategies could be more explicit and the NPF4 could elaborate on how conflicts between them are dealt with – which strategies take priority.		
Calls for guidance from other parts of Scottish Government/agencies to be referenced.		
Concern that there is insufficient reference to Regional Transport Strategies.	New text added in Revised NPF4 Annex A on 'How to use this Document' to reference Regional Transport Strategies.	To respond to stakeholder views.
Call to clearly set out NPF4's connections with LDPs and Regional Spatial Strategies.	New Revised NPF4 Annex (Annex A) on 'How to use this Document', which covers the roles of NPF and other plans in the planning system (including Regional Spatial Strategies, LDPs and Local Place Plans).	To respond to stakeholder views.
Greater clarity on priorities required if the ambitions of NPF4 are to be delivered in a coherent and consistent way – consider whether more could be done to provide decision makers with clarity and certainty.	Multiple changes to structure and wording have been carried out throughout the document to add clarity and clarify intent. Revised NPF4 Policy 1 added to clarify that significant weight is to be given to the climate emergency and nature crisis.	To provide clarity in response to Committee (LGHP) and stakeholder views.
Consider how digital tools might improve the accessibility of NPF4 and understanding of the interrelationship between parts of the document.	No change.	LGHP Committee request. Improving digital tools, including the accessibility of NPF4 is part of our wider Digital Transformation

Changes to Draft NPF4 – General Changes

Issue	Change	Reason/Comments
		Programme. We will explore how NPF4 can be brought together with LDPs in a single development planning platform at the appropriate stage in the digital transformation programme.

Language

Summary of representations

A frequently-raised issue related to the wording used across NPF4, including the frequent use of ‘should’. It was suggested that this is ambiguous, and it is not clear where this means that the relevant policy must be complied with. Another frequent concern was around references to development being ‘supported’ or ‘not supported’, and there was a question as to whether this means that development is to be approved or not to be approved?

Overview of changes

The wording, and use of language has been refined throughout the Revised NPF4 document, particularly within the policies, to provide greater clarity and consistency. Further clarity of definitions of terms provided, with both further detail provided within the [Part 3](#) policies section and with additional terms defined in the [Glossary](#).

Issues raised and changes made

Issue	Change	Reason/Comments
Use of ‘should’ References to development being ‘supported’ or ‘not supported’, and whether this means that development is to be approved or not to be approved.	Policies have been reworded using ‘will/will not be supported’. ‘Will be supported’ is often used within LDPs and is considered to be established development plan wording. Further clarification has been added to Revised NPF4 Annex A to clarify that the decision maker must take into account all relevant policies and material considerations.	To respond to stakeholder views by providing clarification.
Policy priorities and spatial principles must be applied consistently throughout the document – NPF4 must be internally consistent.	Edits have addressed consistency, both in terms of consistent wording and policy intent. Within the policies at Revised NPF4 Part 2, details of connections to relevant spatial principles have been added for consistency in policy application.	To respond to LGHP Committee.
Work on clarity of definitions of terms – e.g.	Text throughout the document has been	

Changes to Draft NPF4 – General Changes

Issue	Change	Reason/Comments
'community wealth building' and '20 minute neighbourhoods'.	reviewed and strengthened.	To respond to Committee (LGHP, RAINE, NZET, HSCS and UK Climate Change Committee).
Work on certainty and clarity in language throughout framework.	Glossary definitions have been refined and additional definitions have been added.	

Additional general points beyond text content of NPF4

Issue	Comments
A number of calls were made for further guidance on a range of issues and policy topics.	<ul style="list-style-type: none"> Wording has been improved throughout to provide greater clarity. Details of planned guidance, to support the delivery of NPF4, are set out in the Delivery Programme which will be updated throughout the life of NPF4. This is not an exhaustive list, but focuses on priority areas of guidance.
Consider how mapping could be included in future iterations of NPF.	<ul style="list-style-type: none"> It is recognised that mapping is a powerful tool. Mapped analysis informed preparation of the spatial strategy as well as regional-scale input to the collaborative preparation process. We will continue build on the use of spatial data in the wider Digital Transformation Programme.
Calls for training for elected members.	<ul style="list-style-type: none"> The Planning Act 2019 includes provisions which make the training of elected members who sit on a planning committee mandatory. We will shortly be commencing stakeholder workshops which will inform the development of a consultation paper setting out our proposed approach.
Calls for more resources.	<ul style="list-style-type: none"> We recognise the concerns over a lack of resources, in terms of headcount and skills, to implement and support the delivery of NPF4. In reviewing policies, we have sought to ensure additional requirements are reasonable and appropriate. We are taking forward collaborative work around investing in the planning service and skills in the planning system.
Role of communities.	<ul style="list-style-type: none"> The new section on outcomes around ‘A Fair And Inclusive Planning System’ highlights that throughout the planning system, opportunities are available to engage in development planning and decisions about future development. Such engagement, undertaken in line with statutory requirements, should be early, collaborative, meaningful and proportionate.
Planning Skills - calls for a resource and skills strategy to be prepared.	<ul style="list-style-type: none"> Not for NPF4 content. We are engaging with COSLA and Heads of Planning Scotland to understand the pressures faced by the planning service and to promote a highly performing system which can deliver on the ambitions for planning set out in NPF4. Scottish Government will work with Partners in Planning to develop a skills strategy which will identify the specialist skills required in the future planning system to ensure we have planners with the skills to deliver on our ambitions for Scotland.
Calls for more details of/funding to support delivery of NPF4.	<ul style="list-style-type: none"> More detail is provided in Part 4 and our Delivery Programme.

Part 1- Spatial Strategy

Spatial Strategy

The draft national spatial strategy was themed around Sustainable, Liveable, Productive and Distinctive places.

Summary of representations

A number of the comments addressed the deliverability of Liveable places, with observations including that there is very little detail on how transformative social and economic change is going to be delivered. Respondents also commented on the importance of communities being empowered to be the key drivers of this change.

There was support for the focus on the just transition to net zero and a nature-positive economy. It was noted that the move to a greener economy could provide opportunities for business development, job creation and investment in communities, through community wealth building. In relation to rural, highland and islands settings, it was suggested that their distinctive socio-economic and market characteristics require a flexible, responsive approach to development, taking account of local context and need.

It was noted that the concept of Distinctive places is already well embedded in the planning system and there were concerns around how high level strategy translates into the individual policies required for delivery. There was support for a stronger commitment to placemaking, although it was argued that, at present, the design-led approach and quality outcomes identified do not feed through into policy.

Overview of changes

The spatial strategy section has been re-presented. We have moved from 4 themes to 3 to better reflect the three pillars of sustainable development. Narrative to each theme has been updated and wording sharpened. Clear linkages to other relevant policies and strategies have been added. Priorities for each theme along with National Developments that will help to deliver the theme have been more clearly presented. Text outlining cross-cutting outcomes and policy links has also been added.

Issues raised and changes made

Issue	Change	Reason/Comments
NPF4 needs to address the needs of all of Scotland's places and people and have clear outcomes and goals to deliver transformative change.	Detail of outcomes and addressing these aspects added and expanded upon upfront (from previously being in an Annex), clearer demonstration of how the spatial strategy supported	To respond to Committee (LGHP).

Issue	Change	Reason/Comments
	by the policies can deliver on outcomes. Outcomes and policy intent added to every Revised NPF4 policy for ease of reference.	
Reference to the Place Principle.	Place Principle references strengthened in Revised NPF4 including in relation to National Developments, design and local living. It is also a key element of the Delivery Programme.	To respond to stakeholder views.
Should be place based with rural, island, urban and peri-urban principles.	Revisions to the document as a whole have taken into account the varying need of different places.	Planning authorities can interpret the principles and provide further detail tailored to their specific needs if necessary.
Make connections to part 3 policies.	Spatial principles now embedded in thematic policies under Revised NPF4 'Policy Impact' sub-heading.	Responding to stakeholder views and ensuring ease of use of the document.
Gaelic – lack of reference or appropriate reference to the importance of the Gaelic language and culture in areas of the country.	Text added.	To respond to RAINE Committee.
Funding needed.	No change.	Delivery programme sets out information on infrastructure funding and finance.
Expand references to the pandemic.	References strengthened throughout document with particular emphasis on reflecting the impact of the pandemic under the narrative for each theme.	To respond to stakeholder views.
Should be a statutory requirement for planning decisions to favour net zero and nature recovery objectives.	Revised NPF4 Policy 1 strengthened to give significant weight to both the climate and nature crises.	To respond to stakeholder views.
National Spatial Strategy map should include further detail.	Maps have been updated. The strategy map now also shows the National Developments.	To respond to stakeholder views.

Spatial principles for Scotland 2045

The Draft NPF4 set out that, in order to build a climate-conscious and nature-positive future, our strategy and the policies that support its delivery are based on six overarching principles.

Summary of representations

Although views were mixed, more respondents agreed that the spatial principles will enable the right choices to be made about where development should be located than disagreed. It was suggested that the spatial principles seem to encapsulate what NPF4 is seeking to deliver, including by recognising that a ‘one-size-fits-all’ approach would not be appropriate.

However, there was also a view that, as currently formulated, the spatial principles might not enable the right choices to be made. Related concerns included that the principles lack clarity and definition. There was a concern that it is not clear how this section is intended to be used by stakeholders of the planning system, what weight these principles will have, or how the spatial principles should or would inform consistent decision-making. Compact growth was the spatial principle that most divided opinion

Overview of changes

The spatial principles have been retained and better represented throughout the document. Table 1 in Revised NPF4 shows how they fit into the overall framework. A policy impact section for each themed policy in Revised NPF4 Part 2 shows which spatial principles the policy will help to deliver.

The narrative around each principle has been strengthened and 3 principles have been renamed to respond to stakeholder views.

Issues raised and changes made

Issue	Change	Reason/Comments
Not clear how spatial principles should be used/ what weight they will have.	Text added to the spatial principles section setting out how to apply the principles in practice. The updated ‘How to Use this Document’ section is now Revised NPF4 Annex A and provides further information.	To respond to stakeholder views and provide clarity.
More spatial principles should be added.	No change.	Suggested topics for additional principles are generally well represented in other parts of Revised NPF4.

Issue	Change	Reason/Comments
Too urban-centric.	Text refreshed and updated throughout. Revised NPF4 includes new policy 17 on Rural Homes.	To respond to stakeholder views.
Consider how priorities and principles could be built upon to more clearly emphasise the contribution NPF4 makes to addressing inequalities, health and wellbeing and the needs of rural and island areas.	New sections on outcomes drafted and moved into themed introduction.	To respond to Committee (LGHP and RAINE).
Reference to the Place Principle.	Place Principle references strengthened as noted above.	To respond to stakeholder views.
Should be place based with rural, island, urban and peri-urban principles.	No change.	NPF4 is a place-based strategy for Scotland as a whole. More detailed place-based approaches are expected to emerge in subsequent LDPs, informed also by future Regional Spatial Strategies. Planning authorities can interpret the principles and provide further detail tailored to their specific needs if necessary.
Compact growth – not relevant in rural areas.	Amended and retitled to focus on Compact Urban Growth. Updated explanation provided.	To respond to stakeholder views and provide clarity.
Compact growth - not always appropriate to use derelict land.	No change.	Issue covered by themed policies including Housing and Brownfield Land.
Compact growth – delivery of housing will be reliant on land coming forward through LDPs.	No change.	Plan Led system. Issues covered by Revised NPF4 Policy 16 Quality Homes.
Local living – clarity needed on 20 minute neighbourhoods particularly in rural areas.	No change to spatial strategy but wording strengthened in the Glossary. The local living policy	To respond to Committee (LGHP and RAINE) and stakeholder views. Supporting guidance is in preparation.

Issue	Change	Reason/Comments
	has also been revised referring to the principles of local living more broadly, this will allow the policy to be more readily applied to rural areas through alternative solutions.	
Balanced development.	Renamed rebalanced development with updated explanation.	To provide clarity.
Balanced development - equality in digital needs to be recognised.	Digital equality now referenced.	To respond to stakeholder views and provide clarity.
Rural urban synergy.	Changed to 'rural revitalisation' to provide a clearer principle which complements the refocusing on compact urban growth.	To provide a clearer steer and embed a key statutory outcome across the document as a whole.
Definitions of terms.	Various terms added and defined in the Glossary.	To respond to stakeholder views and provide clarity.

Action areas for Scotland 2045

The draft NPF stated that each part of Scotland can make a unique contribution to building a better future. It explains that our shared spatial strategy will be taken forward in five action areas and that each area can support all spatial principles.

Summary of representations

General comments included that the spatial strategy action areas provide a strong basis to take forward regional priority actions and that the Draft NPF4 does appear to have identified appropriate priorities for different parts of the country.

One of the most frequently-raised issues was the relationship between the action areas and other spatial areas, with respondents most likely to comment on their connection to Regional Spatial Strategies. It was noted, for example, that considerable work has been put into the preparation of Indicative Regional Spatial Strategies but that the extent to which those have played a part in the preparation of the Draft NPF4 is unclear.

A number of respondents thought that, rather than creating new action areas, it might be clearer if Regional Spatial Strategy areas were used as the spatial expression of policy approaches.

Another frequently-raised issue was the relationship between the action areas and local authority boundaries, with concerns raised about some local authorities being split between different action areas.

- **North and west coastal innovation**

General comments included that there is potential for conflict between the different strategic actions proposed for the North and west. In relation to creating carbon neutral coastal and island communities, the recognition that island and coastal communities will need a bespoke and flexible approach to the concept of 20 minute neighbourhoods was welcomed.

Four strategic actions were included for the North and west coastal innovation action area in the Draft NPF4. With reference to reversing population decline, there were questions about the viability of reintroducing people to previously inhabited areas. There was a call for existing communities to be supported prior to the development of projects aimed at reintroducing people to areas that are not currently inhabited.

- **Northern revitalisation**

A number of comments suggested that there is a great deal of crossover between the Northern and North and west action areas. Some respondents proposed combining them.

Four strategic actions were included for the Northern revitalisation action area in the Draft NPF4. There was support for the reference to the importance of renewable energy generation for climate mitigation, and the need for the repowering and

extension of existing wind farms. However, there were also calls for clarity on what approach will be followed for new wind farm proposals.

- **North east transition**

A general comment was that the North east action area is very much focused on the energy transition, but that there is much more to this region. A connected concern was a view that there is a lack of ambition, vision and understanding of the region.

Four strategic actions were included for the North east transition action area. General comments about the transition to net zero (Action 9) included that it is applicable to whole of Scotland. There was also a call for the action to reflect the potential of the entire north-eastern coastline.

- **Central urban transformation**

Although there were some broad statements of support, a number of respondents raised concerns about either the size of this action area, or the diversity of the communities and places that it covers. There was a particular concern that there is a strong urban focus, and that the challenges and opportunities identified, along with the strategic actions, are less relevant to the significant rural population.

Nine strategic actions were included for the Central urban transformation action area. It was noted that realising a number of the strategic actions will require a regional and catchment scale approach and that the role of the Regional Spatial Strategies to spatially coordinate activities and guide delivery at scale and across authority boundaries, will be key.

- **Southern sustainability**

There was a concern that this action area is not ambitious enough and needs to better reflect the realities of the region. In addition to generally making the language more proactive, it was suggested that the region's contribution to achieving net zero, along with the economic ambitions of the region, should be referenced.

Four strategic actions were included for the Southern sustainability action area. General comments included that the strategic actions could also be more ambitious. Regarding innovating to sustain and enhance natural capital, there was reference to the UNESCO Biosphere and its role in delivery of ecosystem services.

Overview of changes

The principle of Action Areas is retained and refined. The areas are refocused as Regional Spatial Priorities, with an emphasis on context, challenges, priorities and delivery, and the detail moved to Revised NPF4 Annex C.

The approach to these responses reflects an appropriate level of detail for a national spatial strategy. Further detail is expected to emerge in subsequent Regional Spatial Strategies and Local Development Plans. It would not be appropriate for NPF4 to seek to pre-determine regional and local placed-based responses to the Scotland-wide priorities it sets out.

The changes do however, aim to provide a clearer direction on the distinct challenges facing rural and island communities, and other detailed comments and additions have been taken on board in both the main text and more detailed annexes.

Issues raised and changes made

Issue	Change	Reason/Comments
All areas		
<p>Spectrum of views of the utility of this part of the strategy including concerns that areas are untested and questions about application in practice.</p> <p>Views that interim spatial strategies are not reflected.</p> <p>Comments on varying regional geographies and the link between Action Areas and Regional Spatial Strategies, Regional Transport Strategies and local authority boundaries.</p>	<p>Amended. Action Areas refocused as Regional Spatial Priorities and the interaction with Regional Spatial Strategies is set out in the Revised NPF4 Annex A 'How to use this Document'.</p> <p>The Delivery Programme also makes connections with regional scale planning for example by setting out the geography of city and growth deals.</p> <p>Statutory guidance on Regional Spatial Strategies will be developed in due course.</p>	<p>The Regional Spatial Priorities give a clear steer on the strategic priorities for each area, which should be considered further through both future RSS and LDPs.</p> <p>This part of the document has been informed by indicative RSS, with NPF4 highlighting priorities from a broader, national perspective.</p> <p>The broader action areas are flexible, reflect cross-boundary issues and recognise the spatial issues span administrative areas.</p>

Issue	Change	Reason/Comments
Concerns raised about some local authorities being split between different action areas.	Amended. The maps are indicative and some authorities may have a role to play in more than one regional area in response to cross-boundary issues. Revised text in Revised NPF4 Annex A gives clarity on the extent of the Regional Spatial Strategy areas.	Refocused Regional Spatial Priorities set out how each part of the country can help to deliver the overall strategy. Boundaries are intended to be flexible, recognising that planning authorities will define the appropriate geography for Regional Spatial Strategies, and that this may change over time.
Distinct priorities (innovation, transformation, revitalisation, transition, sustainability) apply to other/all areas.	Amended. Descriptive subtitle for areas have been removed, recognising overlaps.	Amendment responds to stakeholder views.
North and west coastal innovation		
Reasonable summary of the issues but should not be read as comprehensive.	No change.	The Revised NPF4 'How to Use this Document' Annex A provides further clarity on the role of this section.
This is a diverse area with differences including varying settlement patterns and population change.	Detailed amendments made to text.	To ensure that differences between the areas are noted and reflect stakeholder views.
Northern revitalisation/North West coastal innovation – suggestion to combine these action areas.	No change to broad areas. Amended North and West Coast and Islands remain separate from North to allow the strategy to reflect the particular opportunities and issues for coasts and islands. A stronger narrative on the links west and north to coastal and island communities is provided.	Regional Spatial Priorities sets out how each part of the country can use their assets and opportunities to help deliver the overall strategy. Within this broad framework, planning authorities are encouraged to work flexibly and to define the geography of their Regional Spatial Strategy as appropriate. The strategy has been designed to act as a clear but flexible framework for future RSS and LDPs to respond to.

Issue	Change	Reason/Comments
Further places to be highlighted or included in the area.	Detailed amendments made to text. Removed strategic diagram showing boundaries to allow for flexibility in application.	To reflect additional priorities and areas highlighted by stakeholders.
Proposals to add further detail on a range of issues including coastal change, environment assets, climate adaptation, connectivity, population change; housing, community wealth/ownership, cost of living, Gaelic, aquaculture and employment.	Various amendments and additional text has been included add further detail on specific opportunities and challenges.	To reflect additional detail provided by stakeholders as far as possible, whilst maintaining a strategic perspective. RSS can address many of these issues in further detail as appropriate.
Concerns about conflict between strategic actions.	These tensions are noted. Policies have been reviewed to ensure trade-offs and synergies between objectives are clearer.	The planning system has a critical role to play in balancing competing objectives.
20 minute neighbourhood concept requires bespoke approach/ cannot be delivered in communities in this part of Scotland.	Amended text to provide greater flexibility.	To ensure that the policy intention of supporting local liveability is applied in a flexible way.
Questions about the viability of reintroducing people to previously inhabited areas.	Amended wording focuses on supporting existing settlements and where appropriate encouraging people to previously inhabited areas where it can be achieved in line with our climate commitments and wider aspirations to create sustainable places. This is now supported by updated policies on rural housing and development which reflect the role of LDPs in taking this forward.	This is a statutory requirement introduced by the Planning (Scotland) Act 2019. The changes aim to reverse past depopulation and support existing settlements in more peripheral and fragile areas in a way that is compatible with our low carbon agenda and which is driven by place-based LDPs.
Proposals to add further detail on renewable energy	Amended text in Revised NPF4 Annex C reflects	To reflect additional priorities and areas highlighted by stakeholders.

Issue	Change	Reason/Comments
opportunities, innovation, ports, space ports, food and drink and tourism.	additional detail provided as appropriate.	
Northern revitalisation		
Comprehensive summary but focus is on extracting benefit from the area's assets rather than creating vibrant and sustainable places. Revitalisation not the priority throughout the area.	Amended text including key priorities, aims to reflect the importance of strengthening communities.	To reflect stakeholder views on the overall tone of this section.
Further detail suggested on specific projects, environmental assets, landscape protection, forestry and peatland restoration, housing, tourism, flooding and water.	Some specific/targeted additions made to text.	While these projects are recognised as important, more specific detail is expected to be appropriate for RSS to take forward.
Calls for clarity on what approach will be followed for new wind farm proposals.	No change. The detailed policy framework sets out the approach to be followed for new wind farm proposals across Scotland.	The annex text acknowledges the area's support for renewable energy generation and the potential for repowering and extending existing sites.
Comments on the title of "strengthen networks of resilient communities."	Spatial priority heading amended.	To provide a more rounded description.
Comments on economic development: flexible approach, tourism impact, renewable energy and infrastructure, ports.	Some specific/targeted additions made to text.	While these projects are recognised as important, more specific detail is expected to be appropriate for RSS to take forward.
Comments on the environmental	Some specific/targeted additions made to text.	While these projects are recognised as important, more

Issue	Change	Reason/Comments
priorities under this theme including opportunities arising, questions about terminology and scope to align with Regional Land Use Partnerships.		specific detail is expected to be appropriate for RSS to take forward.
Connectivity (digital and physical) is important. Proposals to include a range of specific transport improvements.	Spatial priorities reflect importance of connectivity. Some additional references added e.g. A82 and Oban airport.	Additional detail appropriate for STPR2 and RSS/Regional Transport Strategies.
North east transition		
Too focused on the energy transition, lack of ambition, vision and understanding of the region.	Amended wording, with focus on context and priorities, gives a broader sense of the region's assets and potential and provides more detail on specific projects.	Regional spatial priorities sets out how each part of the country can use their assets and opportunities to help deliver the overall strategy. The strategy has been designed to act as a clear but flexible framework for future RSS and LDPs to respond to.
Questions about extent and boundaries.	Amended Regional Spatial Priorities highlight support for continued economic diversification and innovation.	Regional Spatial Priorities sets out how each part of the country can use their assets and opportunities to help deliver the overall strategy. The strategy has been designed to act as a clear but flexible framework for future RSS and LDPs to respond to.
Proposals for more specific detail/ commitments to a range of infrastructure/ development projects.	Some specific/targeted additions made to text.	While these projects are recognised as important, more specific detail is expected to be appropriate for RSS to take forward.
Additions suggested including on biodiversity, housing, farming and crofting,	Some specific/targeted additions made to text.	While these projects are recognised as important, more specific detail is expected to be appropriate for RSS to take forward.

Issue	Change	Reason/Comments
aquaculture, timber production and processing, nature, community empowerment, skills gaps, city centres, coastal regeneration challenges, water supply delivery.		
Transition to net zero applicable to all of Scotland. Should recognise potential of the wider coastline.	Some specific/targeted additions made to text including reference to broader coastline.	Net zero has been considered across all action areas.
Detailed comments on green energy including hydrogen and CCS, solar. Opportunities from ScotWind for ports and harbours.	Some specific additions made, also acknowledging that wider consents are relevant.	Further detail is also included in the national development description.
Too great an emphasis on reducing car use/20 minute neighbourhoods in largely rural areas. Range of views on transport solutions.	Text amended to reflect flexibility of local liveability rather than only 20 minute neighbourhoods.	To reflect stakeholder views and recognise the diversity of the area.
Central urban transformation		
Concerns about the size and diversity of the area.	No change to extent of the area. Additional guidance on how to use NPF4 has been provided in Revised NPF4 Annex A. Description revised to give clearer view on geographic extent – mapping is indicative. Diversity reflected in amended text.	The scale is recognised as significant, but the area is considered to be of an appropriate scale within a broad spatial strategy for Scotland as a whole. This provides flexibility for RSS to emerge within the area which will provide additional detail on strategic priorities over time.
A range of specific projects should be referenced.	Text amended to reflect projects as far as possible and appropriate.	To reflect stakeholder views as appropriate, whilst recognising that additional detail will be provided in RSS.

Issue	Change	Reason/Comments
Contrasts between Glasgow and Edinburgh city regions should be amended.	Description amended to reflect local variations in levels of deprivation/ market.	To reflect stakeholder views whilst maintaining strategic point of variation across the area as shown in spatial evidence.
More emphasis on health and deprivation, town centres, tourism, renewable energy, energy efficiency, and food.	Additional text added as appropriate. Particular additions on health and wellbeing/inequality.	To reflect stakeholder views and ensure strategic challenges are reflected as appropriate.
Questions about whether all actions are relevant to all areas.	No change	The strategy is designed to provide a flexible framework within which more detailed RSS and LDPs can be developed.
More information on delivery required/ deliverability/ resources from Scottish Government.	A Delivery Programme sets out our approach to delivery, recognising the importance of partnership working in delivery.	To provide a clear pathway to support delivery.
20 minute neighbourhoods will be more deliverable here rather than in other areas. Public transport/active travel links between and within them will be important, as well as digital links.	The related policy has been updated to provide clarity on the relevant considerations for planning.	Recognition of the importance of this area in delivering 20 minute neighbourhoods is welcome.
Former coalfield communities should be prioritised	Now highlighted in the text.	To reflect stakeholder views.
Specific comments on cities and town centre challenges.	Minor changes incorporated.	Further development of this theme in regional spatial strategic are expected to take forward more detailed/ varying issues raised.
Green infrastructure – specific comments as well as emphasis on the need for collaboration and investment.	Some specific additions have been made to reflect additional projects.	To reflect stakeholder views.

Issue	Change	Reason/Comments
Specific comments on strategic investment sites.	Additional text added to reflect investment opportunities.	To reflect stakeholder views.
Climate impacts on urban coasts and waterfronts should be acknowledged. Wider role of ports should be recognised/specific projects and priorities for ports in the area. Further specific locations and coasts should be mentioned.	Additional reference to climate adaptation and port based opportunities added.	To reflect stakeholder views as far as appropriate, recognising that some projects will be for regional and local scale planning to take forward.
Support for reusing sites/buildings, but support required for delivery including policy and infrastructure.	A Delivery Programme sets out our approach to delivery, recognising the importance of partnership working in delivery.	To provide a clear pathway to support delivery.
Net zero housing will be a significant challenge. More homes also required. More detail on retrofit/development sector role required.	Minor amendments to text. A Delivery Programme sets out our approach to delivery, recognising the importance of partnership working in delivery. This priority is already reflected in wider investment programmes.	It is recognised that significant investment in existing homes will be required to achieve net zero.
Questions about the meaning and extent of the urban fringe and relationships between cities and rural areas.	Urban fringe removed and replaced with more descriptive text.	To avoid confusion around terminology.
Specific suggestions for including more detail on transport including public transport projects, active travel, roads projects.	No change.	The strategic projects noted are considered appropriate for inclusion in a national spatial strategy. Further detail will emerge in RSS and Regional Transport Strategies, within the context of both NPF4 and STPR2.
Community wealth building should be properly defined.	Policy amendments have been made, complementing the broad approach of the spatial strategy.	To provide clarity and respond to stakeholder views.

Issue	Change	Reason/Comments
Strong urban focus, and that the challenges and opportunities identified, along with the strategic actions, are not relevant to the significant rural population.	Amended Regional Spatial Priorities for Central focus on tackling inequalities and building a new, greener, future for this part of the country.	The detail in revised NPF4 Annex C gives further guidance on spatial planning priorities.
Southern sustainability		
More emphasis should be given to the role of the area in net zero and its economic ambitions.	Various amendments made to address both net zero and economic opportunities.	To reflect stakeholder views and ensure the tone reflects regional priorities/strategies.
Boundaries and extent of the area should be considered further.	Text as a whole reviewed to ensure geographic extent is more fully covered. Additional explanation provided. Cross border links also referenced.	To provide more clarity on the extent of the area.
Reference should be made to specific projects including the UNESCO Biosphere reserve and Galloway Forest Dark Skies Park.	References added.	To highlight additional opportunities/assets in the area and reflect stakeholder views.
More emphasis on natural capital for example peatland and competing land uses/biodiversity.	Additional references added e.g. to land based industries.	To reflect stakeholder views.
Further issues to be addressed: flood risk, onshore wind/transport/Regional Transport Strategy, food and recreation/tourism, blue green infrastructure, climate adaptation.	Changes made as appropriate for a national scale strategy. Many of these issues are addressed across the document as a whole.	To reflect stakeholder views whilst maintaining a broader perspective for the national spatial strategy.
More detail proposed on ambitions for settlements/wider coverage of low	Additional references made including to the importance of housing provisions and the importance of communities in shaping their future.	To reflect stakeholder views.

Issue	Change	Reason/Comments
carbon towns. 20 minute neighbourhoods require tailored approach. Housing requirements of the area should be addressed.		
Further reference should be made to transport and travel	Broad reference to the importance of connectivity included/specific updates provided.	To reflect stakeholder views as appropriate at a national scale.
Range of comments on further opportunities for economic activity and education.	Additional projects added.	To ensure the extent of the area is reflected, for example with additional reference to projects in Ayrshire.
Concern that this action area is not ambitious enough – call for the region’s contribution to achieving net zero, and the economic ambitions of the region, to be referenced.	Amended Regional Spatial Priorities for South set out a strategy which aims to ensure that the area fulfils its potential as a place to live, work and visit, with a focus on climate change, increasing the population and supporting economic development.	The detail in Revised NPF4 Annex C gives further guidance on spatial planning priorities.

Part 2 – National Developments

Summary of Representations on proposed National Developments

A number of issues were raised in relation to the implications of National Development status, including suggestions that it should carry a presumption in favour of planning consent. It was also suggested that guidance will be needed with respect to how to balance the competing priorities of different National Developments, and that it would be helpful to explain how National Developments might interact with Regional Spatial Strategies and the NPF4 action areas.

In relation to the selection of National Developments, it was suggested it would be helpful to set out the rationale for selecting those chosen and why some are conceptual, and others are existing proposals.

Overview of changes

We have reordered the National Developments to work with the three themes for the document as a whole (see [Figure 3](#)). The main document now includes a summary of each development, whilst the technical descriptions have been moved to Revised NPF4 Annex B. We have also made connections to the National Developments in each of the action areas. These structural changes also reflect Committee comments received. The preamble to the statements of need has been revised and included at Annex B with some elements taken into the Delivery Programme. An additional paragraph has been added to the preamble at Annex B to take account of impact assessment findings.

Each national development has been updated, with many of the changes being relatively minor. However, in response to both consultation views and the associated impact assessments, more substantive changes have been made to the Islands Hub for Net Zero, Dundee Waterfront, the Circular Economy Materials Management Facilities and Hunterston Strategic Asset. These changes are described in more detail below.

Some respondents also provided a range of national development suggestions in addition to those proposed in the draft. No further National Developments are proposed at this stage on the basis that the additional proposals have previously been considered following the earlier call for ideas; are more of a policy or strategy than development; are likely to be of sub-national impact in spatial planning terms; and/or already have consents in place or construction is advanced.

Figure 3: National Developments re-ordered under 3 Themes

(Titles as per Draft NPF4)

Sustainable places	Liveable places	Productive Places
Urban mass/rapid transit	National walking, cycling and wheeling network	High Speed Rail
Islands hub for net zero	Digital Fibre Network	Industrial Green Transition Zones
Pumped hydro storage	Stranraer Gateway	Aberdeen Harbour
Urban sustainable blue and green drainage solutions	Central Scotland Green Network	Clyde Mission
Strategic renewable electricity generation and transmission infrastructure	Dundee Waterfront	Chapelcross power station redevelopment
Circular economy materials management facilities	Edinburgh Waterfront	Hunterston strategic asset

Combined comments relating to multiple National Developments and their classes

Issue	Change	Reason/Comments
Request for further clarity on how the National Developments relate to the rest of the framework/each other.	National Developments more strongly linked to the Action Areas and overall aims of NPF4.	To respond to LGHP Committee and stakeholder views and provide further clarity. Actions to progress work with lead partners and national developments more broadly is set out in the Delivery Programme.
Request for clarity on the benefit of national development status.	Text now sets out the purpose of National Developments.	To respond to Committee (NZET) and stakeholder views.
Request for additional detail around process, handling, data, learning and delivery.	Text added to the Revised NPF4 'How to Use this Document' Annex A, including role of LDPs and decision makers.	To respond to stakeholder views.
Requests for 'presumption in favour' for certain elements of National Developments.	No change.	The need for the development is established and other policies also apply in determining applications for consent.
Concern that the 'Town and Country planning (Hierarchy of Developments) (Scotland)	No change.	National Developments are designated through the NPF rather than regulations. Some classes

Issue	Change	Reason/Comments
Regulations 2009 do not include classes specifically addressing particular National Developments.		of the Regulations will directly apply and the regulations include an 'Other Development' class which can be applied to a variety of development proposals.
Boundaries for National Developments/include additional locations within National Developments/make location specific National Developments nation-wide.	Minor amendments.	To respond to stakeholder views. More definite boundaries/locations than those set out in the draft have not been provided given the high level nature of the National Developments. As delivery progresses and project level detail becomes clearer we will seek to provide more fixed boundaries in collaboration with project leads, where relevant. It was not considered appropriate to broaden location-specific developments nationally given the alignment of the National Developments with the broader spatial strategy.
Mapping	Removal of indicative maps within Statement of Need.	For clarity. Maps not considered to add any detail not provided in the overall National Development map. As delivery progresses and project level detail becomes clearer we will seek to provide more fixed boundaries in collaboration with project leads, where relevant.
Concern that relevant contributing development that does not meet the scale thresholds identified is not mentioned in the description are considered unimportant.	No change.	Scaling designed to ensure that National Developments are applied in a proportionate way. Broader policy and the spatial strategy also highlights the combined benefit of smaller scale

Issue	Change	Reason/Comments
		developments in achieving strategic aims.
Concern energy related thresholds beyond the hierarchy of developments are too low or too high.	No change.	The 50 MW threshold for electricity generation reflects the Electricity Act thresholds for Ministerial level decision making and is considered a proportionate approach.
Expression of energy generation and transmission thresholds should align to the Electricity Act.	The expression of the thresholds has been better aligned to the Electricity Act.	To respond to stakeholder views and provide clarity.
Concern that scope of designation/classes is too broad/risk of catching unintended developments.	Amended the 'designation' text to reference the national development title.	National development titles are reflected in the 'designation' text to clearly link the classes to the intended development.
<p>Suggestions that National Developments should protect certain features, habitats and species, including those that are designated and non-designated.</p> <p>Question whether there will be the right trade-off between development and protection.</p> <p>Habitat Regulations Appraisal should be taken into account.</p>	<p>Removed the class of development for quay and handling facilities for ultra large container ships in Scapa Flow, and of land reclamation for port expansion from Dundee Waterfront, as our emerging appropriate assessment identified (on the basis of information available at this stage in the planning process) that it was not possible to conclude that these projects could be progressed without adversely affecting several European sites. This conclusion must be considered again at future stages of the planning process, including at development plan and project level, when more detailed information should be available to inform assessment.</p> <p>Aspirations for relevant developments are however</p>	<p>To respond to Committee (NZET).</p> <p>National Developments focus on future development. They are supported by the wider NPF4 policy which sets out protections as necessary across a variety of topics.</p> <p>The National Developments have been informed by an Integrated Impact Assessment.</p>

Issue	Change	Reason/Comments
	acknowledged in the spatial strategy.	
Request that National Developments include further detail on a range of matters/policy detail.	No change.	NZET Committee request. The 'How To...' section outlines the relationship between National Developments and policy.
Should be aligned to STPR2.	Text amended to reflect the consultation draft STPR2.	To respond to stakeholder views.
Should reference post draft emerging priorities/ initiatives including ScotWind, Innovation and Targeted Oil and Gas Leasing and Green Freeports.	No change.	NPF4 reflects known priorities and commitments and has been designed to provide a long-term framework for further projects as they emerge.
Vacant and derelict land.	Changed reference from vacant and derelict land to 'brownfield land'.	Clarification. The change to brownfield land is consistent with NPF4 policy and includes but is not limited to sites identified on the vacant and derelict land register.
Minor points of detail/ project level detail.	Various amendments.	To respond to stakeholder views. Further more detailed project elements are for lead partners/applicants to take forward.
Some relevant infrastructure is permitted development or not controlled by the planning system.	No change.	National development status does not remove the need for other consents, nor create the requirement for a planning application where none exists at present.
Request to standardise classes relating to hydrogen production, transmission and storage.	Amended text.	To respond to stakeholder views. This provides clarification and has been aligned with hydrogen policy.
Request to not include any technologies that continue fossil fuel use.	No change.	Low carbon approaches are part of the transition to net-zero.
Requests to define terminology.	Amended text, where necessary. Terms have been defined in the Glossary where required.	To respond to stakeholder views.

Issue	Change	Reason/Comments
	More descriptive terms have not been defined as appropriate.	
Lifecycle Greenhouse Gas Emission Assessment should include the water requirements in calculation of carbon impacts of hydrogen production. Impact on local water supplies should be considered.	No change to text.	The greenhouse gas assessment considers emissions across the development lifecycle for both renewable and low-carbon hydrogen production technologies, including water consumption.
Request that National Developments be subject to assessment of their impact on physical activity/health, and that be equal to assessment on climate and nature.	No change.	HSCS Committee Request. The likely health effects of proposed National Developments have been considered and reported on as part of the Strategic Environmental Assessment.
Request for mitigations from Integrated Impact Assessment (IIA) be included.	No change.	Early IIA findings helped inform preparation of the NPF4 including the proposed National Developments.
Request to reflect on recommendations on predecessor committee.	No change.	LGHP Committee Request. The process for preparing, consulting on and scrutiny of NPF4 has evolved since the Scottish Parliament considered NPF3 as a result of the Planning (Scotland) Act 2019. National Developments were identified on the basis of an open call for evidence and published assessment criteria. They were included in the full Draft NPF4 which was subject to extensive consultation and Parliamentary scrutiny.

Central Scotland Green Network (CSGN)

Summary of representations

There was a view that NPF4 should more clearly set out how the CSGN's delivery will be aided through planning. Greater detail and more guidance on how LDPs and spatial strategies should be used to articulate and deliver National Developments was suggested. There were also calls for the CSGN network to be expanded to be a Scotland-wide National Development, or for the creation of a Scottish Nature Network.

Overview of changes

Minor changes to enhance inclusion of blue infrastructure. Amendment to class (a) to recognise that multi-functional green infrastructure may be about new areas for the infrastructure or enhancements of existing areas. Further points about implementation will guide future delivery. Significant changes to the locations of the National Developments were not considered necessary as the locations defined align with the spatial strategy.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Improve clarity and definition, include particular projects.	Minor change to text. CSGN will evolve over time, the high level approach allows for projects to be delivered within the identified classes.	To respond to stakeholder views.
Call for CSGN to be expanded to be a Scotland-wide national development, or for the creation of a Scottish Nature Network.	No change.	Committee request (NZET). This would be a different national development, see criteria for consideration of additional National Developments above.
Include adaptation as a function of the network.	No change.	Adaptation already referenced in the National Development.
Concern that local related supplementary guidance would be lost/reduced.	No change.	Whilst statutory Supplementary Guidance will no longer be part of the development plan, authorities can produce non-statutory guidance.
Class a. Clarify that not all works would be for new	Change incorporated.	To respond to stakeholder views.

PART 2 – National Developments - CSGN

Issue	Change	Reason/Comments
land for or extensions to green infrastructure.		
Class a. Clarify that not all green spaces should be for multifunctional uses.	No change.	The description focuses on classes of development.
Class c. should move from creation of blue space to integration of blue within green infrastructure approaches.	National development text amended to better integrate blue space.	To respond to stakeholder views.
Class d. Include space for farmers markets.	No change.	Specific uses are included within the broader term of open space.
Class e. Should require incorporation of green infrastructure.	No change.	Green infrastructure is addressed by class a.

National Walking, Cycling and Wheeling Network (NWCWN)

Summary of representations

Inclusion of a National Walking, Cycling and Wheeling Network as a national development was welcomed, although it was also argued that it has limited applicability for reducing routine car journeys in rural Scotland. The importance of investment to deliver the network was highlighted, including a view that significant infrastructure investment, over and above existing budgets, will be required.

Overview of changes

These points do not necessitate a change.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Should be re-titled/adjusted to avoid confusion with National Cycle Network.	No change.	The title has been designed to reflect multi-users.
Routes should be defined, clarity on how routes trigger the classes.	No change.	All routes that meet the terms of the designation and class are included in the national development.
Request for detail on accessibility/design characteristics of the infrastructure.	No change.	Suitability for a range of users is included.

Urban Sustainable, Blue and Green Drainage Solutions

Summary of representations

While the Urban Sustainable, Blue and Green Drainage Solutions national development was welcomed, it was also argued that the principles apply beyond Glasgow and Edinburgh and should be extended to other cities and urban areas, or should be a Scotland-wide national development.

Overview of changes

Locational matters are addressed in the table of combined comments. A number of minor changes were made to clarify the role of the catchment areas and amend the approach to grey infrastructure to ensure sustainable drainage systems (SUDS) are not excluded as well as clarifying that released sewer capacity may not only be for new development. The title was amended for clarity.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request for less emphasis on drainage.	Title and text amended to shift focus to surface water management and surface solutions to align with nature based solutions approach.	To respond to stakeholder views.
Request for greater emphasis on water catchment area beyond location reference.	Amended text. Reinforces the approach is beyond the city boundaries.	To respond to stakeholder views.
Request that approach to engineered solutions be softened to allow for Sustainable urban Drainage Systems.	Text amended to be more accommodating of engineered solutions whilst retain emphasis on nature based solutions.	To respond to stakeholder views.
Class should mirror those of Central Scotland Green Network.	No change.	Class is suitable for the national development. Alignment between outcomes across National Developments is possible.
Unclear if this applies to all major development.	Punctuation added to class (a) to show the types of development included.	To respond to stakeholder views.

Urban Mass/Rapid Transit Networks

Summary of representations

Comments in relation to Urban Mass/Rapid Transit Networks included that this national development should be extended to be a Scotland-wide development. The need for stronger public transport connectivity in rural areas was highlighted and it was suggested that a joined-up strategy should take account of new active travel routes as part of a NWCWN.

Overview of changes

No changes were required to address these points, the national development is in addition to the NPF4 policy on transport. Relationship to the delivery programme and mutually supporting National Developments is addressed in the table of combined comments above. Significant changes to the locations of the National Developments were not considered necessary as the locations defined support the spatial strategy.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request for clarification through reference to specific projects.	No change.	The text is aligned to STPR2.
Calls for improvement included design with active travel synergy in mind, in particular cyclist safety, and protection for existing environments in any mass transit developments There were also calls to improve the walking environment and emphasis on the importance of buses.	No change.	NZET Committee request. National Developments work together with the wider planning policies in NPF4. Policies encourage modal shift and interconnectivity. Specific design will be taken forward at the project level, and will be required to respond to the planning policy context.

Digital Fibre Network

Summary of representations

Comments on the Digital Fibre network were largely limited to expressions of support. The importance of connectivity was highlighted in relation to remote access to services, Mobility as a Service, and reducing unnecessary travel.

Overview of changes

These points do not necessitate a change.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
New class. Add infrastructure climate resilience including through back-up systems.	No change.	The digital infrastructure is listed, back-up systems meeting the classes would be included. Detailed design is for the project level.

Circular Economy Materials Management Facilities

Summary of representations

Some respondents expressed support for the Circular Economy Materials Management Facilities national development, including a view that materials facilities could play a significant role in delivering greater sustainability in the construction and demolition industries.

There was also a call for clarity around how this national development will be delivered to avoid unintended outcomes.

Overview of changes

Points on delivery are included in the combined comments table.

Two classes have been removed: ‘Repurposing facilities’ and ‘Reprocessing facilities’ and definitions for the remaining two classes have been added to the Glossary. These two changes improve the clarity for the developments to be included in the national development.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Insufficient detail to inform decision making/clarify what isn't included, e.g. end of material life treatment.	Amended text - Number of classes reduced and definitions provided in the Glossary.	To respond to stakeholder views and improve clarity.
Call for clarity around delivery.	No change.	The Delivery Programme sets out actions to support the delivery of National Developments.
Request for support for/ policy on deconstruction.	No change.	NPF4 policy on zero waste includes minimising demolition and salvaging materials for re-use.

Strategic Renewable Electricity Generation and Transmission Infrastructure

Summary of representations

This proposed national development was the national development that attracted the highest level of comments. Although aspects of this national development were welcomed, some respondents called for clarity that, in the planning balance, there should be significant weight attached to development that contributes directly to achieving net zero. The requirement that renewable energy generation developments should exceed a threshold of 50MW capacity in order to qualify for national development status was questioned. An alternative view was that the threshold should be raised, since the benefit of large-scale projects can clearly be seen to be of national importance.

Overview of changes

The table on combined responses includes a points on requests for further policy detail, including on climate change, and requests for alterations to the thresholds at which national development status applies. Decisions on applications for National Developments also need to include relevant policy matters. Revised NPF4 Policy 1 deals with the Global Climate Emergency. The text was amended for clarity, including for on and off-shore infrastructure and in relation to the context.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request for presumption in favour of the development including repowering and life extensions.	No change.	National development status establishes the need for the development but other policy considerations still apply.
Request to include other electricity generating infrastructure.	No change.	It is intended that the electricity generation relates to renewable sources.
Request to focus on re-use of existing sites/infrastructure.	No change.	Re-use requiring consent would be included where the thresholds are met.
Request to include supporting role of ports/harbours.	No change.	Ports and harbours addressed in the wider spatial strategy.
Class b. Request to add reference to transmission.	Amended text.	To respond to stakeholder views and provide clarity.
Class b. Request to clarify 'replacement'.	Amended text. to 'upgraded'.	To respond to stakeholder views and provide clarity.
Class b. Request to clarify if high voltage electricity lines includes buried	Amended text. Reference to cables included.	To respond to stakeholder views and provide clarity.

PART 2 – National Developments –
Strategic Renewable Electricity Generation & Transmission Infrastructure

Issue	Change	Reason/Comments
cables for offshore renewables/ infrastructure.		
Request to include offshore elements.	Amended text. - Reference to offshore included in class a.	To respond to NZET Committee. To respond to stakeholder views and provide clarity.
Class c. Request to clarify if offshore infrastructure is included.	Amended text. - to clarify on and off shore infrastructure is included.	To respond to NZET Committee. To respond to stakeholder views and provide clarity.
Request to include new class, green hydrogen.	No change.	Addressed by other National Developments.
Request to include new class, repowering.	No change.	Repowering requiring consent would be included where the thresholds are met.

Islands Hub for Net Zero

Summary of representations

General comments on the Islands Hub for Net Zero included that it is not clear why net zero projects are National Developments only if they are proposed in the Western Isles, Shetland and Orkney Island groups, and that consideration should be given to their support more widely. It was also suggested that this national development has the potential for significant impacts on nature and that it will be essential that development can be assessed for impacts on nature, in particular the cumulative effects on Special Protection Areas (SPAs) and marine mammals.

Overview of changes

Changes to this national development were mainly structural to clarify the scope and extent of the national development through reference to particular projects (Arnish Renewables Base and Outer Energy Hub, Opportunity for Renewable Integration with Offshore Networks (ORION), Scapa Flow Future Fuels Hub and Orkney Harbours), although still working within the scope of previous classes and locations.

The title was amended for clarity. The reorganisation and expression of classes within each project reflects stakeholder information received. Class (a) addressing general employment related development has been removed as part of the restructure of the national development, enhancing the focus on the energy aspects.

We have removed class (g), development for quay and handling facilities for ultra large container ships in Scapa Flow, as our emerging appropriate assessment identified (on the basis of information available at this stage in the planning process) it was not possible to conclude that this could be progressed without adversely affecting several European sites. This conclusion will need to be re-examined at project level when a greater level of detail regarding the design and delivery of the scheme will be available. New revised NPF4 class (f) under the ORION project reflects aspirations for handling captured carbon beyond infrastructure identified in class (c).

NPF4 has been informed by relevant impact assessments and individual developments will be subject to further such assessment as necessary at subsequent consenting stages.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Potential for confusion with Islands Centre for Net Zero/ Islands Growth Deal.	Amended text. Title changed and text restructured to emphasise the purpose of the national development.	To respond to stakeholder views and provide clarity.
Should include specified developments/in island locations including in classes.	Text restructured and in-island locations clarified. Does not extend to aquaculture as a benefiting use as the national development focuses on the energy aspect.	To respond to stakeholder views and provide clarity.
Orkney research campus already developed.	Amended text - reference to the campus deleted.	To respond to stakeholder views. Correction.
Near-arctic logistics would benefit from definition.	Text moved into spatial strategy reflecting shift in focus of the national development from shipping to low and zero carbon energy production.	To respond to stakeholder views and provide clarity.
Impacts on nature, SPAs and marine mammals.	No change.	The National Developments have been informed by our Integrated Impact Assessment.
Should include scope for floating structures to support offshore wind.	No change.	The classes do not prevent proposals for floating structures from coming forward.

Industrial Green Transition Zones

Summary of representations

Industrial Green Transition Zones were welcomed, although it was also suggested that Aberdeen, Sullom Voe, Opportunity Cromarty Firth and industrial and service bases within the Inner Moray Firth should be added. Carbon capture and storage (CCS) was considered by some to have a crucial role in decarbonising industry. However, other respondents expressed opposition to the production of blue hydrogen, and it was argued that the use of CCS should not be supported.

Overview of changes

Changes made were to make it clear that this is not a Scotland-wide national development and to clarify the scope of the hydrogen related classes. Passenger facilities at Grangemouth were removed in response to a stakeholder request. Matters relating to location are addressed in the table of combined comments.

A point around enhanced oil recovery was removed. A reference to the forthcoming energy strategy was removed as this is not necessary for the finalised version. A reference to consideration, of upstream emissions and the role of thermal generation as part of finalisation of NPF4 were removed as they are unnecessary for the finalised version of NPF4. Lifecycle greenhouse gas emissions assessment has been undertaken for the National Developments. Thermal generation in the context as set out by the classes of development remains important.

The national development aligns with the Scottish Government's policy on hydrogen and approach to the Scottish Cluster, including CCS.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Mechanism for incompatibility with net zero transition ambition test needed.	No change.	The Planning (Scotland) 2019 Act provides for interim review of NPF if required. Regulations that set out procedures for such changes will be brought forward in due course.
Class d. Request to include offshore hydrogen production.	Amended text.	To respond to stakeholder views and provide clarity.
Class f. Request to include hydrogen storage.	Amended text. Hydrogen storage class amended to include non-geological storage.	To respond to stakeholder views and provide clarity.
Class g. Request to include off-shore hydrogen storage.	Amended text. Off shore included.	To respond to stakeholder views and provide clarity.

PART 2 – National Developments – Industrial Green Transition Zones

Issue	Change	Reason/Comments
Class i. Request removal.	No change.	Thermal generation is already part of the Scottish cluster and CCS technology is needed as part of its decarbonisation.
Class j. Request to remove reference to bioenergy.	No change.	Scottish Government policy on bioenergy identifies its potential as part of the transition to net-zero.
Class o. Request to amend to include electricity infrastructure.	No change.	The class is not just about electricity infrastructure. Utilities and local energy network may include electricity infrastructure.
Class p. Request to remove passenger facilities.	Amended text.	Correction, to respond to stakeholder views.
New classes requested for port and freight infrastructure.	No change.	Classes already provide for port and freight handling facilities contributing to the delivery of the national development.

Pumped Hydro Storage

Summary of representations

Comments in relation to Pumped Hydro Storage included that it should not be described as ‘all Scotland’ in view of the specific requirements of topography and landform. There was a view that prioritising Cruachan pre-judges delivery timelines for other schemes and it was argued that all pumped hydro storage above 100 megawatts (MW) in capacity should be considered as a national development.

Overview of changes

This national development applies where the thresholds are triggered by proposed development and is not intended to be the outcome of a review of sites for pumped hydro storage.

Reference to Cruachan has been softened now it has entered its consenting phase. Other locational aspects are addressed in the table of combined comments.

Thresholds for when the national development applies are addressed in the table of combined comments.

Text in particular classes which made a reference back to the pumped hydro scheme has been removed and replaced with reference to the title in the designation text, as per the point in the table of combined comments on the scope of classes/designation text.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request to de-emphasise focus on Cruachan.	Location text amended. Reference to Cruachan elsewhere maintained as consents are outstanding but emphasis is now placed on the national development being nation-wide.	To respond to stakeholder views.

Hunterston Strategic Asset

Summary of representations

Regarding the Hunterston Strategic Asset national development, it was suggested it would be helpful to reflect the national scale of opportunity of a blue economy centred at Hunterston. The need for careful planning was highlighted in relation to potential negative effects on a number of nationally important natural assets.

Overview of changes

The changes mostly relate to reflecting the economic (blue economy) potential of the area, potential around nuclear decommissioning expertise, allowing greater flexibility in relation to the transport network and recognising that climate adaptation may be needed in the area around the site.

Locational aspects are addressed in the table of combined comments.

A new class has been added to incorporate electricity transmission infrastructure reflective of the potential uses at the site.

Protection of certain features is addressed in the table of combined comments.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Reflect scale of opportunity in the wider location.	Amended text.	To respond to stakeholder views and provide clarity.
Opportunity provided by nuclear decommissioning noted.	Amended text.	To respond to stakeholder views.
Access requirements including those linked to STPR2 should be included.	Amended text - approach to transport network capacity revised to be consistent with other National Developments.	To respond to stakeholder views and provide clarity. The text is aligned with STPR2.
Access road at flood risk by 2080s.	Amended text - point on flood risk management solutions broadened geographically.	To respond to stakeholder views.
Class c amendments including marine construction, energy generation, fabrication, and decommissioning.	No change.	Aspects are already addressed in the classes.
Class d amendments including marine energy servicing including, renewable energy	No change.	Aspects already addressed in the classes without specific linkage to marine energy servicing.

PART 2 – National Developments – Hunterston Strategic Asset

Issue	Change	Reason/Comments
generation, testing, assembly, manufacture, servicing, maintenance, training, research and development.		
Class h. Request to include new nuclear.	No change.	Not supported by current Energy Strategy.
Class h. Request to include electricity transmission infrastructure.	Amended text. New class added. Consistent with intended/existing assets.	To respond to stakeholder views.
New class: Aquaculture, research and development centre.	No change.	Research and development already included in classes.
New class: digital hub and associated infrastructure.	No change.	Digital addressed in a different national development.

Chapelcross Power Station Redevelopment

Summary of representations

Comments in relation to Chapelcross Power Station Redevelopment included that there should be a greater emphasis on renewable energy to take advantage of the transmission lines and national grid infrastructure.

Other points related to protection of the natural environment including that retaining and enhancing an extensive area of nature-rich unimproved grassland will provide benefits for the local community.

Overview of changes

Renewable energy is already addressed in the national development.

Aspects relating to protected and natural features are addressed in the table of combined comments.

Changes made are to clarify class (c) for hydrogen.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request for greater emphasis on renewables.	No change.	Renewable energy already included.
Request to include nuclear energy.	No change.	Not supported by current Energy Strategy.

High Speed Rail

Summary of representations

While High Speed Rail was supported, comments often related to areas of the country that will not benefit from current proposals with references to southern Scotland, Dundee, Aberdeen, and Inverness. Other points raised included that the relationship with STPR2 recommendations should be set out, including the need for further work to determine the future of high-speed rail in Scotland.

Overview of changes

Locational aspects are addressed in the table of combined comments.

The position on High Speed Rail reflects agreements made with the UK Government. An update has been made to improve alignment with STPR2.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request to broaden classes to include associated infrastructure/ land take.	No change.	The focus is on the core infrastructure.

Clyde Mission

Summary of representations

National development status for Clyde Mission was welcomed, including as aligning with the Glasgow City Region Climate Adaptation Strategy. It was suggested that combining this national development with the Urban Sustainable Blue and Green Drainage Solutions national development would help the area adapt to the impacts of climate change. It was also argued a proportionate response to flood risk is required, recognising both the hazards posed by different types of flooding and that different approaches may be acceptable, depending on the nature of the risk.

Overview of changes

Synergies between National Developments are addressed in the table of combined comments.

Changes relating to flooding have been included in the flooding policy of NPF4 rather than the national development.

Other changes are to include reference to the Glasgow Riverside Innovation District, to clarify the focus on previously developed land (brownfield land) and clarify that residential development is not a requirement of class (a).

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Concern about ability to develop the area given Future Functional Floodplain policy.	Text amended in the flooding policy to provide for on-site mitigation.	To respond to stakeholder views.
Include other named investment sites/areas.	Text amended to include Riverside Innovation District, supported by the planning authority and doesn't change the location identified.	To respond to stakeholder views.
Class a. Request to clarify whether residential use is necessary or optional.	Text amended	To respond to stakeholder views and provide clarity.
Class b. Request to limit to development on previously used land.	Text amended.	To respond to stakeholder views and provide clarity.

Aberdeen Harbour

Summary of representations

Comments on Aberdeen Harbour included that the area to which the designation applies is unclear and that greenfield land near the south harbour should be explicitly excluded. There were also calls to reference delivery of the proposed Energy Transition Zone and to broaden the national development to reflect the Freeport zone being considered.

Overview of changes

Locational aspects are addressed in the table of combined comments and will form part of the onward delivery of National Developments.

The exclusion of greenfield land in this location could have a bearing on the LDP process in relation to the Energy Transition Zone, which does not form part of the national development. It is not for NPF4 to determine locations that will receive Freeport status, refer to the table of combined comments.

Changes made are about clarifying Class (e) for hydrogen, including carbon capture and to correct the reference to the North and South harbours.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request to change name to 'Aberdeen Waterfront'.	No change.	The national development focuses on the harbour locations.
Request to clarify application to both north and south harbours/ phrasing of referencing of harbours.	Amended text - Location descriptor clarified.	To respond to stakeholder views.
Mixed views on Energy Transition Zone/await for outcome of LDP process.	No change.	The LDP process is considering the Energy Transition Zone, NPF4 has no bearing on the timing of that, the report of examination of unresolved representations to the LDP has been published and is for consideration by the planning authority prior to the LDP being adopted. The national development does not prevent the re-use of existing industrial land.

PART 2 – National Developments – Aberdeen Harbour

Request to deal differently with greenspace impacts/ preserve green space.	No change.	The LDP process is considering the Energy Transition Zone. The national development focuses on the harbours. Other relevant policies apply. Enhancement of and access to green space are identified in the statement of need so form part of onward delivery.
Does not support off-setting as alternative provision of green space not possible.	No change.	Text identifies enhancement rather than alternative provision.
Request to have broader focus, including housing, given South harbour completion due in 2022.	No change.	The national development encompasses both harbours. Classes already refer to mixed uses for the North harbour.
City centre reinvigoration does not require harbour redevelopment.	No change.	Making use of brownfield land fits with the approach of NPF4.
Presentation of statutory assessment regimes.	Amended text to remove reference and text amended.	For consistency. This could apply to a range of National Developments and so is addressed in Revised NPF4 Annex B.
Request to not include low carbon hydrogen/support renewable hydrogen only.	Amended text. but not to restrict hydrogen types, class (e) updated to reflect more standardised wording, aligned to Scottish Government hydrogen policy, as identified in the table of combined comments.	Hydrogen has potential in the location and is supported by wider Scottish Government policy.
Request to include specified port/manufacturing/commercial uses.	No change.	Classes highlighted cover a range of port and commercial uses.
Class d. Request to clarify if it applies to both harbours and to renewables/low carbon technologies specifically.	No change.	The class is sufficiently broad to include renewables, which are highlighted elsewhere in the text. The location description includes both harbours.

Stranraer Gateway

Summary of representations

In relation to the Stranraer Gateway, it was suggested that there should be a greater focus on quality of life, wellbeing and sustainability, and that 20 minute neighbourhoods, blue-green infrastructure and active travel should be considered.

Overview of changes

Changes made relate to STPR2 references, and minor clarification within classes (d), (e) and (f). The national development is not intended to be a comprehensive approach to regeneration and focuses on infrastructure and land uses, which will contribute to quality of life and wellbeing outcomes.

As noted in the table of combined comments, other policies that apply in addition to the national development do not need to be addressed in detail in the national development description.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request for broader scope including quality of life/place and the asset of Loch Ryan.	No change.	Inequalities already included in statement of need. Wider policy applies to habitat protection/enhancement.
Request for reference to active/sustainable/multimodal travel.	Amended text - punctuation added to class d to draw out sustainable travel.	To respond to stakeholder views. The class already refers to a number of modes.
Border Control post being considered for the area.	No change.	The national development does not affect the provision or otherwise of a Border Control Post.
Role of Stranraer rail station and connections to Cairnryan should be included.	No change.	The national development aligns with STPR2 and Cairnryan access is already included.

Dundee Waterfront

Summary of representations

Continued designation of Dundee Waterfront as a national development was welcomed. However, a shift in emphasis from economic revitalisation to include a more balanced place-based aspiration for Dundee Waterfront was suggested.

The opportunity to create an outstanding and strategically important vibrant green and blue space that could serve as a regional hub and catalyst for a Tayside green and active travel network was highlighted.

Overview of changes

Changes made are for clarification.

We have removed class (e) for land reclamation as identified in the table of combined comments, as our emerging appropriate assessment identified (on the basis of information available at this stage in the planning process) it was not possible to conclude that this could be progressed without adversely affecting European sites. This conclusion would need to be re-examined at project level when a much greater level of detail regarding the design and delivery of the scheme will be available.

Aspirations for port expansion are acknowledged in the spatial strategy and an improvement in facilities remains supported. Place based aspects are already reflected and onward aspects of delivery are for lead partners, as referred in the table of combined comments.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request to broaden scope beyond economic ambition.	No change.	Other purposes are included in the national development, including active travel, blue and green infrastructure.
Request re-wording of Class d to reflect integration of more than active travel infrastructure.	No change.	The class already includes sustainable travel.

Edinburgh Waterfront

Summary of representations

General comments on Edinburgh Waterfront included that there should be read across to the CSGN, NWCWN and Urban Sustainable, Blue and Green Drainage Solutions National Developments.

It was argued that a focus on Leith to Granton needs to be set in the context of the wider coastal environment and that the potential for negative effects on landscape and seascape need to be addressed.

Overview of changes

Changes made are limited, including clarifying the location, and adjusting the designation text as referred to in the table of combined comments. The relationship between National Developments is addressed in the table of combined comments.

NPF4 has been informed by relevant impact assessments, reported in the accompanying Integrated Impact Assessment, as noted in the table of combined comments.

Issues additional to those in the table of combined comments

Issue	Change	Reason/Comments
Request to include reference to Edinburgh Nature Network.	No change.	This is a point of project level detail that may form part of the green and blue infrastructure already included.
Request to include foreshore access.	No change.	This is a point of project level detail that may form part of active and sustainable travel routes already included.

Part 3 – National Planning Policy

Summary of representations

Across the policies, there were frequent requests for greater clarity, including through the inclusion of definitions of key terms and/or by providing further information or guidance. There were also a number of references to policies being strengthened, including by requiring, rather than permitting, their application. This latter point was often connected to the more frequent use of ‘must’, rather than ‘should’. There were a number of comments about how the application of the Universal Policies relates to the application of other NPF4 policies, and in particular whether the Universal Policies are expected to take precedence.

Overview of changes

Each policy has been set out to ensure that the policy intent and outcome are clear. Instructions for Local Development Plans have been separated out to remove confusion with development management policies and there is tightened wording throughout each and every policy. We have also added links to other key policy connections and identified which spatial principles will be delivered through each policy.

New structure of Policies:

- Policy intent
- Policy outcomes
- Delivery: local development plans
- Delivery: development management
- Definitions
- Language - should be supported = will be supported
- Rationalising criteria for assessing development types – focus on type specific issues only

The universal policies section, which caused confusion, has been removed. The revised document instead focuses on one Priority Policy on the Climate and Nature Crises.

Language has been strengthened throughout – moving from ‘should’ to ‘will be supported’ or ‘will not be supported’ to ensure clarity and consistency. The ‘How to Use this Document’ Annex provides additional information on this policy section.

Policies have been restructured to reflect three themes:

Figure 4 : National Planning Policies – changes to themes and order from Draft to revised version of NPF4

Draft NPF4	Revised NPF4
<p><u>Sustainable places</u></p> <ul style="list-style-type: none"> • Plan-led approach • Climate emergency • Nature crisis • Human rights and equality • Community wealth building • Design, quality and place <p><u>Liveable places</u></p> <ul style="list-style-type: none"> • 20 minute neighbourhoods • Infrastructure First • Quality homes • Sustainable travel and transport • Heat and cooling • Blue and green infrastructure, play and sport • Flood risk and water management • Lifelong health, wellbeing and safety <p><u>Productive places</u></p> <ul style="list-style-type: none"> • Business and employment • Sustainable tourism • Culture and creativity • Green energy • Zero waste • Sustainable aquaculture • Minerals • Digital infrastructure <p><u>Distinctive places</u></p> <ul style="list-style-type: none"> • City, town, commercial and local centres • Historic assets and places • Urban edges and the green belt • Vacant and derelict land and empty buildings • Rural places • Natural places • Peat and carbon rich soils • Trees, woodland and forestry • Coasts 	<p><u>Sustainable places</u></p> <ul style="list-style-type: none"> • Tackling the climate and nature crises • Climate mitigation and adaptation • Biodiversity • Natural places • Soils • Forestry, woodland and trees • Historic assets and places • Green belts • Brownfield, vacant and derelict land and empty buildings • Coastal development • Energy • Zero waste • Sustainable transport <p><u>Liveable places</u></p> <ul style="list-style-type: none"> • Design, quality and place • Local living and 20 minute neighbourhoods • Quality homes • Rural homes • Infrastructure first • Heat and cooling • Blue and green infrastructure • Play, recreation and sport • Flood risk and water management • Health and Safety • Digital infrastructure <p><u>Productive places</u></p> <ul style="list-style-type: none"> • Community wealth building • Business and industry • City, town, local and commercial centres • Retail • Rural development • Tourism • Culture and creativity • Aquaculture • Minerals

General Issues raised and changes made

Issue	Change	Reason/Comments
Request for greater clarity.	Amendments made throughout to add clarity and confirm intentions.	To provide clarity in response to stakeholder views. Further detail on each individual policy changes outlined below.
Issues around definitions of terms.	Added definitions to Glossary, refined existing Glossary definitions, and tightened language throughout.	
Language - issues with wording of should/could/must throughout policies.	Wording of each policy has been strengthened to provide clarity. For consistency and clarity we now use 'will / will only / will not' be supported.	
Call for greater clarity on the weight of the Universal Policies in relation to other policy areas.	Universal policies removed. Revised NPF4 Policy 1 'Tackling the climate and nature crises' gives significant weight to the global climate crisis in order to ensure that it is recognised as a priority in all plans and decisions.	To respond to Committee (LGHP, NZET, RAINE) views. As with current development plans, the weight to be given to competing policy areas will be a matter of judgement for the decision maker, following the approach set out in policy 1 and considering policies in the development plan. This is explained in the 'How to Use this Document' Annex. To assist users we have identified key connections between policies – these are informal. It is for the decision maker to determine which policies apply.
No clear hierarchy of policies/ weighting of universal policies in relation to other policy areas.		
Call for further guidance on how planning authorities should balance potentially competing policy areas.		
Policies do not match the ambitions of the statements in Part 1 – they appear less onerous, or loosely framed.	Strengthened the wording of each policy to add clarity of intent. Schematic added to show how individual policies help deliver overall strategy.	To respond to stakeholder views.
Calls for references to other Scottish Government documents within text/policies.	Schematic added showing key policy connections with other SG documents. The narrative around each	NPF4 is a 10 year plan and these documents may change or be superseded within its lifetime. Other SG strategies have

Issue	Change	Reason/Comments
	theme also refers to relevant strategies.	therefore not been named within individual policies.
Calls for cross-referencing other policies within policy text.	Greater internal consistency provided. Added 'Policy impacts' and 'Key policy connections' to each policy for cross-referencing Added links to spatial principles to each policy	To respond to stakeholder views and provide clarity. Further detail provided under individual policies.
Greater cross-consistency in policies needed.		
Calls to filter spatial principles through into policies.		
Clarity needed on what parts of policy to be addressed in LDPs and what to be considered in planning applications.	Amended the format of policies to be clear on what parts of the policy will be delivered through LDPs and what parts will be delivered through Development Management	To respond to stakeholder views and provide clarity.
Call for clarity over the extent to which planning authorities will have freedom to adapt the policies.	Added new 'How to Use this Document' as an Annex which explains 'There is no need for authorities to replicate policies within NPF4 in LDPs, but authorities can add further detail should there be a need based on the area's individual characteristics.'	To respond to stakeholder views and provide clarity.
Notable policy omissions, including on some of the matters of importance to the national economy. There was specific reference to air travel, oil and gas, the transition from fossil fuels and nuclear energy.	Added text to the national spatial strategy to confirm that Airports will provide vital connections within Scotland and beyond which will be crucial to building on a sustainable recovery whilst helping to decarbonise transport through low and zero emissions technologies. Policy on Development proposals that seek to explore, develop, and produce fossil fuels, and also on Unconventional Oil and Gas, is set out in the Minerals Policy.	To respond to stakeholder views and provide clarity.

Policy 1: Plan-led approach to sustainable development

Summary of representations

Most of those providing comment expressed their support for a plan-led policy approach, and the role of LDPs in guiding use and development of land in the long-term public interest. However, some questioned the value of Policy 1 as currently drafted, taking a view that it does not add significantly to requirements already set out in legislation.

Overview of changes

Policy 1, which supported a plan-led approach to sustainable development has been removed in response to views that it is too broad and potentially confusing. The requirement is now explained in the ‘how to use this document’ section.

Issues raised and changes made

Issue	Change	Reason/Comments
Questions over the value of the policy – does not add significantly to requirements already set out in legislation.	Removed policy.	To respond to stakeholder views. An Annex has been added on ‘How to Use this Document’, providing more detail on the plan-led system and the links between LDPs, RSSs and LPPs.
Reflect further on how a public-led planning approach can be further developed and embedded.	No change.	Committee request (LGHP). Not for NPF4 content. Wider point on Delivery. The Delivery Programme and its Governance will involve a range of partners, in line with the Place Principle, to lead and enable sustainable development in line with the spatial strategy and NPF outcomes. See Part 4 Delivering Our Spatial Strategy
Reflect on concerns raised about the ability of planning departments to embrace a public-led planning system.	No change.	Committee request (LGHP). Not for NPF4 content. Wider point on Skills and Resourcing.

PART 3 – National Planning Policy
Draft Policy 1: Plan-led approach to sustainable development

Issue	Change	Reason/Comments
		See sections under General Comments on Skills & Resourcing.

Policy 2: Climate Emergency

Summary of representations

In relation to all development proposals giving significant weight to the Global Climate Emergency, most of those commenting supported this policy objective. Respondents suggested that transformational change is required across the planning system, and some felt that the policy is not strong enough to deliver this change. Not supporting development proposals that will generate significant emissions unless it is proven that the level of emissions is the minimum that can be achieved was seen as vital to ensuring that planning can contribute to climate change and nature recovery.

Overview of changes

This is Revised NPF4 Policy 1 ‘Tackling the climate and nature crises’ and Policy 2 ‘Climate Mitigation and Adaptation’. This policy has been refined, given issues raised around implementation, emissions assessment, exceptions clauses and emissions offsetting. The new overarching policy 1 sets out that the contribution of development proposals to the global climate emergency and nature emergency should carry significant weight in planning decisions. The revised policy sets out a higher level requirement for this to be taken into account, recognising that practice in this area is evolving. The draft policy generated concerns about implementation and that all of the policies will work collectively to address the climate emergency, rather than a single policy. A simplified approach to mitigation and adaptation principles have been included in a separate policy (2). We will support emissions assessment with guidance and good practice as it evolves.

Issues raised and changes made

Issue	Change	Reason/Comments
Questions about prominence, how the climate emergency will be implemented through the planning system and balanced against other priorities in decision making.	<p>New Revised NPF4 Policy 1 gives prominence to climate emergency.</p> <p>LDP policy added to Revised NPF4 Policy 2.</p>	To respond to LGHP Committee, NZET Committee, and the UK Climate Change Committee. To add clarity of policy intent in response to stakeholder views and ensure it is clear that the climate emergency is a key priority alongside the nature crisis. Matters included in NPF4 policy may be grounds for approval or refusal of applications where considered appropriate by the decision maker.

Issue	Change	Reason/Comments
Questions about how NPF4 will match ambition with action.	The Revised Draft as a whole aims to ensure that all relevant policies contribute to addressing the climate emergency.	Committee request (LGHP). The delivery of NPF4 is a shared responsibility and it is supported by a Delivery Programme which sets out key actions to implement its priorities and policies. Embedding the need to address the climate emergency across relevant policies reinforces its importance and influence over decision-making.
Strengthen link between climate change and biodiversity / reject any development contributing to climate change or biodiversity loss.	New Revised NPF4 Policy 1 on the climate and nature crisis now added and will combine with other policies. This will ensure that in all planning decisions, contributions to the climate and nature emergencies will carry significant weight.	To respond to stakeholder views.
Location and design of new infrastructure should be chosen with climate adaptation in mind.	Revised NPF4 Policy 2 now makes reference to 'siting' to clearly address the point of location.	To respond to UK Climate Change Committee.
2 (b) development designed to minimise emissions		
LDP role in emissions reduction and adaptation omitted. Adaptation not for individual proposals.	Added LDP section.	To respond to stakeholder views.
Query whether policy applies to minor developments.	Amended text – Whilst policy 2(b) applied to all developments, 2(c) identified thresholds for further assessment and approaches for emissions management. Those thresholds and approaches have been removed given the rewording of the policy which applies to all development proposals.	To respond to stakeholder views including mixed views on assessments and thresholds.

Issue	Change	Reason/Comments
2 (c) development proposals that will generate significant emissions		
<p>Emissions assessment/adaptive design is for building standards rather than planning.</p>	<p>No change.</p>	<p>It is recognised that planning complements wider regulation including building standards, which is better enabled through the broader approach set out in Revised NPF4 Policy 2. This also allows for flexibility as practice evolves.</p>
<p>Emissions Assessment methodology unclear.</p> <p>Concerns about the resources needed for assessment, and understanding adaptation needs and the potential for disadvantaging applicants least able to pay for the assessment. Some emissions are not in the control of the applicant.</p> <p>Mixed views about the range of developments emissions assessment should apply to.</p> <p>More clarity required on when it is acceptable to allow a development that generates significant emissions.</p>	<p>The policy language has been simplified and siting and design considerations have both been noted as important.</p> <p>Amended text is more open in relation to project level assessment to reflect lack of a single assessment methodology at present.</p> <p>Additional policy on LDPs completes the policy to ensure broader spatial strategies have an important role to play.</p>	<p>To respond to committee (NZET).</p> <p>Policy revisions mean that there is more flexibility to enable authorities and applicants to take a proportionate approach ahead of further guidance and practice developing. There is currently no single accepted methodology. However, future guidance to support the application of the revised policy in practice is recognised as a priority in the Delivery Programme. In the meantime, revised policy does not impose significant additional burdens on applicants or planning authorities. Whilst this policy has an important role to play, collective effort is required across all policies. The contribution of NPF4 as a whole to reducing emissions is set out in the Revised Draft. Policy will also be applied in combination with Revised NPF4 Policy 1, which gives significant weight to the climate crisis. Policy has been simplified to remove uncertainty and</p>

PART 3 – National Planning Policy
Draft Policy 3: Nature Crisis

Issue	Change	Reason/Comments
		clarify policy intent and outcomes.
Costs associated with emissions reduction should not be used to erode development benefits, such as affordable housing.	No change	NPF4 policy should be read as a whole. It is for decision makers to identify the policies relevant to the application before them and apply weighting as they consider appropriate.
Key concepts should be defined.	Amended policy removes specific terms and concepts. Glossary definitions.	To respond to Committee (NZET) and stakeholder views.
Should have greater support for/consideration of sequestration/ restoration of sequestering habitats/ carbon negative development/development supporting targets including renewables.	No change.	Sequestration may form part of an approach to emissions minimisation. Habitats that also sequester are addressed in Revised NPF4 policies (3) Biodiversity, (5) Soils, and (6) Forestry, woodland and trees. Revised NPF4 Policy 11 Energy supports renewable, low-carbon and zero emissions technologies including negative emissions technologies.
Request for further detail on assessment criteria and technologies/approaches to be deployed.	No change.	This is a matter for delivery and guidance rather than policy.
Include broader policy elements such as: public transport, active travel, circular economy, carbon sinks and stores, nature based solutions, embodied emissions.	No change.	These issues are addressed in other Revised NPF4 policies including: sustainable transport (13); Soils (5); forestry, woodland and trees (6); and zero waste (12).
Mixed views on off-setting, from support to implementation problems. Concern that it would be a	Amended text removes reference to off-setting to not over-ster the	To Respond to Committee (NZET). The approach is simplified but off-setting may remain a legitimate

Issue	Change	Reason/Comments
means of justifying high emitters.	approach to emissions minimisation.	part of the response to minimising emissions for plans or proposals.
Exceptions clauses raised concerns.	Amended text removes the exceptions clauses, to avoid over-steering the approach to emissions minimisation.	To respond to stakeholder views.
Phased approach to implementation suggested.	The simplified approach, together with supporting guidance and developing practice, will achieve this.	Policy has been drafted to be flexible to allow practice to evolve over time.
2 (d) designed to be adaptable to the future impacts of climate change		
Strengthen the approach to mitigation by incentivising emissions reduction on existing sites, specify a development pathway to net zero, include retrofitting of buildings.	See 2(c) above.	To respond to stakeholder views. Specific emissions reductions and net/zero pathways for individual building types will be for consideration by building designers. NPF4 helps steer the approach by focusing on emissions minimisation.
Incorporation of mitigation measures inconsistent with approach to not support development with significant emissions.	See 2 (c) above.	To respond to stakeholder views.
Refusals on adaptation grounds should not be overturned.	No change.	Not for NPF4 content; process requirements are set in legislation.
Strengthen the approach to adaptation by referencing current climate change impacts; biodiversity; renewable energy; retrofitting and brownfield land, set out the climate impacts to design for, provide adaptation standards, separate out from mitigation. Provide guidance on adapting places and infrastructure.	<p>Policy amended to clarify the role of LDP in adaptation.</p> <p>Policy amended to clarify adaptation expected for new development.</p> <p>Retrofit policy updated to reflect support/encouragement.</p>	To respond to stakeholder views. Amendments made are for clarity. Changes have not been made in relation to specific climate change impacts or the degree of climate change to design for, as the impacts and their prioritisation will change over time. Further definition on this is not for NPF4 content as the issues and broader response are defined elsewhere including in the Scottish Climate Change Adaptation Programme

PART 3 – National Planning Policy
Draft Policy 3: Nature Crisis

Issue	Change	Reason/Comments
		and climate change risk assessment reports from the UK Climate Change Committee.
Adaptation should be prioritised for designated sites/ buildings balanced with heritage concerns to avoid decline.	No change.	This is a matter for guidance and delivery rather than policy. NPF4 provides a supportive framework for adaptation measures.
Concerns that the approach to adaptation is excessive, building re-use is not always the most sustainable. Assessment should be made case by case.	No change.	The policy establishes a framework for adaptation to be supported and allows regional and local data to inform local approaches. Other policies also influence the approach to adaptation, for example (10) Coastal development, (19) Heat and cooling, and (22) Flood risk and water management. Although NPF4 policy promotes asset re-use more broadly the 6 spatial principles contribute towards sustainable development.

Policy 3: Nature Crisis

Summary of representations

There was support for recognition of the nature crisis within NPF4 and for the emphasis on improving biodiversity. One perspective was that the policy should be strengthened further and should require planners to give significant weight to the nature crisis when considering development proposals. An alternative view was that the approach should be more flexible, or more proportionate to the type and scale of development proposed.

Overview of changes

This is Revised NPF4 Policy 3 Biodiversity. The Revised NPF4 Policy 1 ‘Tackling the climate and nature crises’ has also been added to set out that the contribution of development proposals to the global climate emergency and nature crisis should carry significant weight in planning decisions. Minor amendments were made to the rest of this policy to ensure consistent use of terminology and clarity.

Issues raised and changes made

Issue	Change	Reason/Comments
Planners to give significant weight to the nature crisis.	Revised NPF4 Policy 1 ‘Tackling the climate and nature crises’ sets out that significant weight is to be given to the global climate emergency and nature crisis.	To respond to stakeholder views.
To ensure that the inextricable link between the climate emergency and the nature crisis is fully taken into account, it was suggested that Policy 3 should refer to Policy 2 (Climate change).	Amended text - Universal Policy 3 is redrafted into Revised NPF4 Policy 1 ‘Tackling the Climate and Nature Crises’ and policy 3 ‘Biodiversity’.	Clarity of message and to help with document flow.
Provide clearer Glossary terms; content was also suggested.	Added Glossary definition for “Nature-based solutions” and updated/expanded definition provided for “nature networks”.	To respond to Committee (NZET) and stakeholder views.
Provide a range of additional technical content.	No change.	Some of the suggestions relate to matters more appropriately dealt with through other mechanisms, e.g. the forthcoming Scottish Biodiversity Strategy, or

Issue	Change	Reason/Comments
		are otherwise for legislation.
Greater clarity on methodology to be used/how impacts are quantified to ensure a net positive effect.	Added reference to the use of 'best practice assessment methods' to the Revised NPF4 Policy 3 'Biodiversity' at part (b). Added reference to 'national and local guidance' to Revised NPF4 Policy 3 at part (c).	To respond to Committee (NZET) and stakeholder views. The NatureScot guidance document, 'Developing With Nature' supports this policy in relation to local development proposals. Scottish Government have commissioned research to explore options for developing a biodiversity metric or other tool, specifically for use in Scotland. This work is at early stages, we will work with NatureScot on a programme of engagement with stakeholders as this work progresses
Relationship between policy 3 and policy 32 (natural places) needs to be made clearer	Structural changes made to address this issue.	To respond to stakeholder views.
3 (a) Development plans should facilitate		
The word "facilitate" queried. Calls for clarity around its meaning in this context.	Removed the word "facilitate" and language tightened to also reference the mitigation hierarchy.	For clarity and to respond to stakeholder views.
Further detail/clarity required regarding Nature Networks.	Amended text - language tightened for clarity. Expanded 'Nature Networks' Glossary definition.	To respond to Committee (RAINE) and stakeholder views. Opportunities for implementation may be identified through, e.g. LDPs and/or Local Biodiversity Action Plans and/or other existing or new mechanisms such as those developed under the Scottish Biodiversity Strategy Delivery Plan, to achieve connectivity within and across urban, peri-urban and rural landscapes.

PART 3 – National Planning Policy
Draft Policy 3: Nature Crisis

Issue	Change	Reason/Comments
Focus should be on increasing all biodiversity, not just priority species.	Amended text.	To respond to stakeholder views
3 (b) proposals should contribute to the enhancement of biodiversity		
Is not proportionate, does not take account of scale.	Amended text to provide flexibility.	To respond to stakeholder views.
3 (c) potential impacts to be minimised through careful planning and design		
Paragraph is vague and broad.	Amended text -wording strengthened for clarity. Reference to 'cumulative impacts' added.	To respond to stakeholder views.
3 (d) proposals for national, major and EIA development		
As drafted the text suggests that the policy would not apply to national and major developments that are not also EIA development.	Amended text to make clear the policy applies to national, major or EIA developments.	To respond to stakeholder views.
Appropriate Assessment should be omitted as this can be very small scale.	Removed Appropriate Assessment as a requirement.	To respond to stakeholder views.
Local Nature Conservation Sites should be added.	No change.	Policies on development proposals affecting Local Nature Conservation Sites are set out in the Natural Places policy.
Queries regarding exclusion of applications for farmed finfish/shellfish development.	Exclusion text moved to Revised NPF4 Policy 32 'Aquaculture'. Added wording to make clear that this exclusion is related to open water aquaculture. Onshore aquaculture proposals are not excluded.	To respond to stakeholder views. Open water aquaculture is excluded from some of the detailed provisions but not from the overall policy itself. We recognise that specific and unique considerations apply in the context of the marine environment, and will be exploring marine biodiversity specifically through the National Marine Plan and through the development of Scotland's forthcoming biodiversity strategy and a Vision for sustainable aquaculture.
Social and community impacts of biodiversity should be considered.	Added part (b) bullet point (v) to Revised NPF4 Policy 3 'Biodiversity' - 'local	To respond to stakeholder views.

Issue	Change	Reason/Comments
	community benefits of the biodiversity and/or nature networks have been considered’.	
3 (e) proposals for local development		
Local developments should not be held to lower biodiversity enhancement standards by virtue of their classification.	No change.	We consider the approach in targeting the most stringent requirements to larger scale proposals and proposals likely to have a significant environmental effect (regardless of classification) as the most appropriate and proportionate.
The requirement should be to conserve, restore and enhance.	Amended text for consistency and clarity.	To respond to stakeholder views.
Householder development should not be excluded, or should otherwise be encouraged to integrate nature-based solutions and deliver positive effects for biodiversity.	Expanded text in Revised NPF4 Policy 14 ‘Design, quality and place’ more expressly encourages a design-led approach to achieving sustainable places, including by integrating nature positive, biodiversity solutions.	NatureScot guidance, ‘Developing With Nature’ supports this policy and includes enhancement measures which could be applied to householder development.

Policy 4: Human rights and equality

Summary of representations

Some respondents described NPF4 as an opportunity to build on existing legislation, while others suggested that it is not an appropriate vehicle to meet human rights and equalities duties. It was also suggested that respect for human rights and promotion of equality should be considered across all parts of NPF4, rather than being limited to a single policy.

Overview of changes

This policy has been removed, given concerns it did not add anything to existing legal requirements and could generate delays. It has been replaced by a new separate statement on the contribution of development supported by NPF4 to communities and equality.

Issues raised and changes made

Issue	Change	Reason/Comments
4 (a) planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality		
NPF4 contains a statement rather than a policy on human rights. Use of this policy in development management could cause excessive delays to delivery.	Amended references to affirm the importance of Human Rights and Equalities in planning. Removed as a policy for development management purposes, but now included upfront within the outcomes in Part 1 of Revised NPF4.	To respond to stakeholder views. Universal policies have been removed to focus on climate emergency/nature crisis. Human Rights and Equality now cited as a cross-cutting outcome under A Fair and Inclusive Planning System.
Human rights policy is a reiteration of what is required under planning and equality law.	Amended references to affirm the importance of Human Rights and Equalities in planning.	To respond to stakeholder views. Specific reference is now made to the legislative framework around human rights and equalities.
Policy should list key human rights issues to be addressed.	Added reference to Human Rights Act and UNCRC.	To respond to stakeholder views, reference is now made to the UNCRC – with specific reference to the participation of children and young people.

Issue	Change	Reason/Comments
4 (b) consult and engage others collaboratively, meaningfully and proportionally		
Consider what more can be done to ensure communities are supported to engage in shaping the places in which they live, particularly communities from more disadvantaged areas.	No change.	LGHP and RAINE Committee request. NPF4 provides a policy framework for community engagement. This is recognised as a key aspect of wider planning reform.
Consider what more can be done to alleviate consultation fatigue including ensuring that consultation is undertaken timeously and communities are involved in a collaborative rather than consultative manner.	No change.	LGHP Committee request. Policy confirms that engagement should be early and collaborative. Engagement should also be proportionate. Details of planned guidance, to support the delivery of NPF4, are set out in the Delivery Programme which will be updated throughout the life of NPF4. This is not an exhaustive list, but focuses on priority areas of guidance.

Policy 5: Community wealth building (CWB)

Summary of representations

There were some concerns that ‘community wealth building’ is not a well understood concept, including reference to differing interpretations across planning authorities and other stakeholders. It was also suggested that the policy lacks sufficient detail to ensure effective and consistent implementation. There were calls for practical examples of how development plans, and the planning system as a whole, can support community wealth building.

Overview of changes

This is Revised NPF4 Policy 25 ‘Community wealth building’. This policy has been updated to provide criteria to assess proposals against and improve definition. It has also been moved to the ‘productive places’ section to sit alongside economic/sectoral policies as part of a joined-up response to the priorities of the National Strategy for Economic Transformation.

Issues raised and changes made

Issue	Change	Reason/Comments
Clarify what ‘community wealth building’ means.	Added policy outcomes section and examples given in the policy.	To respond to Committee and stakeholder views and provide clarity.
Need for community wealth building objectives and examples of how planning can contribute.	Policy states that LDPs are to align with any strategy for community wealth building for the area.	
Existing policy and legislation could provide the basis for a definition of community wealth building		
Respondents also identified a range of specific considerations which they wished to see reflected in the policy.		

PART 3 – National Planning Policy
Draft Policy 5: Community wealth building

Issue	Change	Reason/Comments
5 (a) Development plans should address community wealth building		
To reference social and environmental factors alongside economic development.	No change.	To avoid repetition. NPF4 is to be read as a whole, these factors are addressed in other policies.
Include greater weighting for community-led development proposals.	Amended wording to refer to community-led proposals.	To respond to stakeholder views and provide clarity.
5 (b) proposals should contribute to community wealth building objectives		
Call for further detail on how developments are expected to contribute, and thresholds on range of proposals to which it would apply.	Amended wording requiring LDPs to align with local community wealth building strategy.	To respond to stakeholder views and allow flexibility around local circumstances and priorities.
Add flexibility to enable community wealth to be tailored to local needs.	As above.	To respond to stakeholder views and allow flexibility around local priorities and needs.
Local community wealth building strategies or objectives required to enable LDPs to address priorities.	As above.	To respond to stakeholder views and provide clarity.

Policy 6: Design, quality and place

Summary of representations

The focus on ensuring good quality design and the importance of design for quality placemaking was welcomed, although some suggested that considerations of viability and delivery can often over-rule quality of design. The reference to ‘high quality’ design was seen as by some as too subjective and it was suggested that further detail is required to support a clear and objective approach to design, and to ensure consistency across planning authorities.

Overview of changes

This is Revised NPF4 Policy 14 ‘Design, quality and place’. This policy has been moved to the liveable places section, given its close relationship with 20 minute neighbourhoods and housing. The wording has been simplified to reduce scope for broad interpretation and debate. A table explaining the six qualities of successful places has been further expanded to help with application of the policy.

Issues raised and changes made

Issue	Change	Reason/Comments
Consider whether ‘Place and Design’ is appropriate as a Universal Policy.	Restructured to remove reference to Universal Policies. ‘Place and Design’ now sits in ‘Liveable Places’ section.	The Universal Policies have been removed to reduce confusion in response to other stakeholder feedback. The policy is now more closely aligned with the liveable places policies including Local living and 20 minute neighbourhoods.
6 (a) proposals should be designed to a high quality		
Call for greater clarity of design led approach.	‘Policy Intent’ added which now includes and is clear about the role of design led approach in placemaking. Reference to urban and rural added to criterion for clarity at a) to reiterate that design applies to all areas across Scotland.	To respond to stakeholder views.
Request to ensure consistency of implementation.	Added the need for consistency under Revised NPF4 Policy 14 Outcomes and 14 (b) includes consistency in relation to	To respond to stakeholder views.

Issue	Change	Reason/Comments
	the delivery of the six qualities. Approach in (a) amended so proposals 'improve quality' of an area.	
Suggestions made around the elements that constitute good design.	The six qualities of successful places have been reviewed. Further details provided at Revised NPF4 Policy 14 (b).	To respond to stakeholder views.
Viability and delivery considerations can often over-rule design considerations.	No change.	NPF4 policy should be read as a whole. It is for decision makers to identify the policies relevant to the application before them and apply weighting as they consider appropriate.
Role of community engagement.	Included in LDP section.	To respond to stakeholder views.
6 (b) incorporate the key principles of Designing Streets, Creating Places, New Design in Historic Settings and any design guidance adopted by planning authorities and statutory consultees		
Calls to remove references to out of date documents.	Criterion deleted.	To respond to stakeholder views.
Some concern regarding reference to design principles and guidance produced by planning authorities and statutory consultees.	Criterion deleted. LDP section provides for local design guidance to be identified where required.	To respond to stakeholder views.
Suggestions for further cross referencing of other NPF4 policies, and other policy and guidance outwith NPF4, including to better link with placemaking.	Added Key policy connections.	To respond to stakeholder views. NPF4 policy should be read as a whole, avoiding unnecessary duplication.
6 (c) demonstrate how the six qualities of successful places have been incorporated		
Calls for clarity and some amendment to the content of the six qualities, including of additional criteria.	Six qualities have been refreshed and now sit in Revised NPF4 Annex D.	To respond to stakeholder views and provide clarity.
Calls to include requirement for long-term maintenance of any development.	No change.	Maintenance already existed in the six qualities but is now also addressed in thematic policy for blue

Issue	Change	Reason/Comments
		and green infrastructure, and play and sport.
6 (d) development proposals that are poorly designed should not be supported		
Calls for clearer criteria to clarify how 'poorly designed' is defined.	Amended text to help clarify intent and to include impact on amenity. Six qualities improved to assist in the reduction of subjectivity when meeting the criteria.	To respond to stakeholder views.
Questioned the need for d) in addition to e) and suggested that they could be merged.	Amended and policies merged.	New Revised NPF4 Policy 14(c) is unequivocal about poor design being refused.
Call to include a clear statement of the negative impacts of poor design on placemaking and NPF4 policies.	No change.	Revised NPF4 policy section deals with the desirable outcomes and actions rather than the impacts and risks.
6 (e) detrimental to the character of appearance of the surrounding area		
Call for clarity regarding the criteria by which proposals can be judged.	Criterion deleted. Amenity is a consideration included in new 14 (c).	Reduction in ambiguous or subjective design language in response to stakeholder views.
Calls for a proportionate response to proposals that impact on character or appearance.	Criterion deleted. Amenity is a consideration included in new 14 (c).	The degree of impact will be determined by planning authorities.

Policy 7: Local living

Summary of representations

Most of those commenting on Policy 7 saw a need for further detail on how the principle of 20 minute neighbourhoods can be applied across the diverse urban and rural areas of Scotland. Many commented that the policy seems to apply primarily to urban and accessible areas, and there was some scepticism as to whether the principle of 20 minute neighbourhoods can be applied meaningfully to rural areas.

Overview of changes

This is Revised NPF4 Policy 15 'Local living and 20 minute neighbourhoods'. This policy has been revised to be more flexible by referring to the principles of local living more broadly, as well as the specific solution of delivering 20 minute neighbourhoods. This will allow the policy to be more readily applied to rural areas through alternative solutions.

Issues raised and changes made

Issue	Change	Reason/Comments
Greater thought around the application of concept in rural setting.	Amended policy name to Local living and 20 minute neighbourhoods to recognise that the '20 minute neighbourhood' concept has momentum building around it but effectively means living locally. The 20 minute metric may not be applicable in all circumstances but is a means of understanding the ideal distance/time travelling to access local services. Language altered throughout to clarify. Added greater emphasis within policy wording around the importance of taking account of local circumstances, place-based particular characteristics and challenges faced in each place. Recognition also given within wording to the importance of considering	To respond to Committee (LGHP, RAINE and HSCS) and stakeholder views. To clarify intention around Local living policy.

Issue	Change	Reason/Comments
	varying settlement patterns.	
Call for more information around delivery particularly in rural and island areas.	Amended language in policy to reflect the variety of contexts to which this can apply.	To respond to Committee (LGHP, RAINE and HSCS) and stakeholder views. Guidance will provide further support/detail on delivery.
Amendments sought to avoid policy being overly restrictive on new development/limiting urban regeneration.	Amended wording to give greater clarity in relation to principles of local living and 20MN and around expected contributions of development to wider outcomes. Policy determines expectations around development planning and contribution to sustainable development, including urban regeneration.	Intention is not to limit or restrict development, but to ensure that development proposals align with the principles of local living and 20MN and can contribute to wider outcomes around health, inequalities and climate change.
Concerns over policy delivery – importance of the coordination between policy and decisions/potential role of the Place Principle.	Amended policy clarifies role of LDPs in delivery. Upfront recognition that policy is means of encouraging, promoting and facilitating Place Principle.	Guidance will provide further support/detail on delivery. The Place Principle also underpins the NPF4 Delivery Programme.
7 (a) LDPs should support the principle of 20 minute neighbourhoods		
Practical applicability needs to be strengthened by setting out the underlying principles that planners can assess against. Examples would help illustrate how the concept can be applied widely across diverse geographies.	Amended policy wording sets out principles against which development will be supported and recognises that the concept is a means of implementing the Place Principle.	To respond to Committee (LGHP and UK Climate Change Committee) and stakeholder views. Guidance will provide further support/detail on delivery.
Clarity around the weighting that LDPs should give to the principle of 20MN to enable planning authorities to balance requirements.	Amended policy wording clarifies.	To respond to stakeholder views.
7 (b) proposals consistent with the principles of 20 minute neighbourhoods should be supported		

Issue	Change	Reason/Comments
Request that the wording of b) is strengthened, draft wording is too imprecise. Query over what constitutes a 'relevant development proposal'	Amended policy language provides clarity around what development proposals will be assessed against. The criteria are not intended to be exhaustive. The primary requirement of the policy is to consider the application in relation to its local context.	To respond to stakeholder views. Guidance will provide further support/detail on delivery.
Clarity required as to what these proposals should include and that the principles underpinning the 20 minute neighbourhood should be embedded into all planning decisions, not just those where an entire new neighbourhood is being created.	Amended policy wording to ensure policy can be applied to development in both new and existing neighbourhoods	To respond to UK Climate Change Committee and stakeholder views.
Policy should link to policy 10 (Sustainable travel). Emphasis on need for mix of transport solutions – 20% car KM reduction target and linkages.	Amended text to reflect the variety of transport options that would be key to Local living and 20 minute neighbourhoods.	To respond to stakeholder views. The revised version is structured so that each policy notes Key Policy Connections and Policy Impacts – helping with cross referencing.
Detail - concern that the concept is applied in a way that does not meet expectations around inclusivity and access.	No change.	Guidance will explain the use of policies, strategies, investments and tools. It will communicate that it is not just the existence of the features required for a 'full life' that makes a 20 minute neighbourhood but the quality and accessibility of those features.
Concern over centralisation of services particularly in rural and island communities which may reinforce structural and institutional barriers to addressing poverty and inequality.	Amended wording to give policy emphasis that the solutions for Local living and 20 minute neighbourhoods must be reflective of local circumstances and that networks of neighbourhoods can be a	To respond to Committee (HSCS) and stakeholder views.

Issue	Change	Reason/Comments
	solution to support local living.	
Policy needs to address all aspects of local living.	Amended wording to include crucial considerations for local living to succeed. Policies that relate to each other are now linked together under Key policy connections.	To respond to stakeholder views. Detail will be included in Guidance.
Seeking further detail on a wide range of issues such as infrastructure, town centres, VDL, brownfield site reuse, greenspace, blue and green infrastructure, local food growth and offering, local jobs, reducing commuting/travelling unsustainably, low carbon transport and heat, protecting existing assets.	Minor amendments/ additions to the policy text.	To respond to stakeholder views. Further detail will be included in Guidance responding to issues around qualitative aspects of local living including sustainable travel. Alignment with other policy drivers and investments will support delivery.
Delivery – emphasis required around the role of LDPs and LPPs in delivering Local living and 20 minute neighbourhoods.	Reflected in LDP section.	To respond to stakeholder views.
Importance of local communities and businesses as key stakeholders.	Reflected in the LDP section.	To respond to Committee (LGHP and NZET) and stakeholder views. Guidance will refer to application of the Place Principle and wider policies, strategies and investments for delivery.
Recognition that housing is a key plank of 20MNs and how land is allocated for housing, community-led development and self-build.	Policy is explicit in the expectations for LDPs to support local living through the spatial strategy and development planning. Policy wording references the importance of affordable and accessible housing options.. Policy is	To respond to stakeholder views.

PART 3 – National Planning Policy
Draft Policy 7: Local living

Issue	Change	Reason/Comments
	also reflected in the Quality Homes Policy.	
Digital Connectivity and the importance to Local living and 20MN.	Amended. Recognised in policy outcomes.	To respond to stakeholder views.

Policy 8: Infrastructure First (IF)

Summary of representations

Some respondents expressed their support for the infrastructure first approach, including supporting delivery of the infrastructure required by 20 minute neighbourhoods, providing an opportunity to improve active travel infrastructure, and reference to the importance of energy and other infrastructure for delivery of carbon reduction targets. It was suggested that effective delivery will require significant investment, both in terms of strategic infrastructure investment, and ensuring sufficient resourcing of the planning system.

Overview of changes

This is Revised NPF4 Policy 18 'Infrastructure first'. This policy has been refined, with changes made to provide clarity over the policy intention, its scope and the role of Local Development Plans. There was qualified support for the alignment of this policy with the infrastructure investment hierarchy as well as suggestions that more detail is required in this policy. Much of the detail will only be forthcoming at the level of Local Development Plans, which identify specific land allocations, consider infrastructure capacity and requirements and set out methodologies for gathering planning obligations. Whilst some stakeholders may feel that that the redrafted policy should have gone further, the delivery programme will be a tool for all stakeholders to input to, to help identify solutions to some of the questions which were raised, for example, about infrastructure funding and delivery.

Issues raised and changes made

Issue	Change	Reason/Comments
Provide clarity over how the infrastructure levy will support an infrastructure first approach.	No change.	Committee Request (LGHP). This will be taken forward as part of the wider planning reform work programme. Ahead of policy development and consultation, it would be premature to make specific provision for it in the policy.
IF Policy should be Universal policy.	No change.	Universal policies have been removed in response to wider stakeholder views. Priority policies focus on climate emergency/nature crisis only.
Clarify what "infrastructure first" means.	Added policy intent.	To respond to stakeholder views and be clear of policy intention that IF means putting infrastructure

PART 3 – National Planning Policy
Draft Policy 8: Infrastructure First

Issue	Change	Reason/Comments
		considerations at the heart of spatial planning.
Clearer definition of 'infrastructure' required. For example to align with IIP. Suggested specific infrastructure types included renewable energy, flood risk management, housing, electricity grid and blue & green infrastructure.	Meaning of 'infrastructure', for the purposes of NPF4 IF policy, is now included in the Glossary.	To provide clarity of message and to help with document flow. Meaning includes blue & green infrastructure, electricity generation and distribution (grid) and flood risk management. Meaning does not include 'housing' as specific provision is made for this elsewhere in NPF4.
Scope - whether IF policy relates only to enabling housing development or should other types of infrastructure be aligned with this policy.	Glossary definition of 'infrastructure' added for the purpose of NPF4 IF policy.	To respond to stakeholder views, and provide clarity.
Detail of how IF policy will be delivered - source of funding for large projects. Concerns over infrastructure capacity and funding gaps. Need additional mechanism for planning authorities to leverage delivery (beyond contributions).	No change.	Delivery is a shared responsibility and is multi-faceted. NPF4 is not a capital spend document but will be supported through alignment with wider funding programmes and strategies. Detail of actions and responsibilities to support NPF4 delivery are set out in the Delivery Programme.
Need to address infrastructure funding issues. Front funding issue – need guidance for LDP Delivery Programme.	No change.	Infrastructure funding is the responsibility of a number of sectors. NPF4 does not have a dedicated funding programme. NPF4 will be delivered through a range of stakeholders and funding commitments. Further detail on infrastructure funding is set out in NPF4 Delivery Programme.
Further detail on how planning authorities are expected to cost infrastructure requirements.	No change.	Beyond the scope of what can be included in NPF4. Guidance on local development planning will

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Draft Policy 8: Infrastructure First

Issue	Change	Reason/Comments
		provide further detail on implementing IF approach.
Greater clarity on the role of developer contributions, alongside other mechanisms for funding.	No change.	Circular 3/2012 sets out policy on planning obligations. Developer contributions remain part of the funding toolkit. A review of developer contributions will be undertaken as part of wider planning reform.
Sufficient skills/ resourcing of planning system are needed to support IF policy.	No change.	Issues of skills/resourcing is beyond scope of NPF4. The Delivery Programme sets out high level framework for delivery, which includes actions for skills/resources.
It was suggested that a national body may be required to direct and coordinate infrastructure delivery.	No change.	Consideration of a national infrastructure body/infrastructure company is outwith the scope of NPF4 policy. Delivery Programme sets out proposed approach to co-ordinating planning and infrastructure.
IF policy should support the role of communities in choosing appropriate infrastructure for their area.	No change.	IF policy emphasises the need for early engagement and collaboration with relevant stakeholders.
Welcome that IF policy recognises infrastructure development in its own right, but opportunities to deliver renewable energy may arise independent of the LDPs in future.	No change.	Other NPF4 policy deals with renewable infrastructure. Planning for renewables is not precluded by IF policy. Meaning of infrastructure for purposes of IF policy includes energy generation.
Translate national infrastructure requirements at a local level. NPF4 to set out clear links between national development and IF policy.	No change.	IF policy states that plans should align with relevant national, regional and local infrastructure plans. Responsibility for delivering national infrastructure sits in different organisations.

Issue	Change	Reason/Comments
8 (a) LDPs and delivery programmes based on an infrastructure-first approach		
Clarify whether a) is simply a description of what is required in the delivery programme.	Amended to clarify what LDPs will be required to do.	To provide clarity of message and respond to stakeholder views.
Plans and policies listed at (a) may have different review cycles, potentially leading to issues of alignment with LDPs.	Removed reference to IIP/NTS/STPR to address the risk that reference to specific plans will date NPF4. Reference to specific sectoral plans is contained in Delivery Programme.	To help with document flow and improve clarity of message - now refers to national, regional and local infrastructure plans and policies. Having plans/strategies at different cycles is not uncommon. Moving towards better alignment remains desirable and will be an iterative process.
Infrastructure First approach must take account of projected future need (including for projected climate change impacts).	No change.	IF policy states that LDPs are required to be informed by evidence of infrastructure “needs” which could include future need.
Infrastructure should be considered at a strategic level. IF policy should reflect the cross-boundary nature of infrastructure/impacts.	Reference to ‘within the plan area, including cross-boundary infrastructure’ has been included in LDP section.	To respond to stakeholder views, and provide clarity of message. Reference to cross-boundary infrastructure addresses catchment issues.
Focus should be on prioritising key infrastructure requirements. IF policy should identify what types of infrastructure should be prioritised.	Inserted ‘...identifying the infrastructure priorities...’.	To respond to stakeholder views. IF policy is overarching, setting out the expected approach for how infrastructure considerations, in the round, are to be taken account of in planning. Within the wider context of NPF4 policy, infrastructure priorities may vary across areas. This change supports that process through LDPs.
IF policy should highlight the importance of clarity on infrastructure requirements for developers.	Amended text - LDPs are to set out ‘... where , how, when and by whom’	To respond to stakeholder views.

Issue	Change	Reason/Comments
	infrastructure is to be delivered.	
Inflexible – planning authorities cannot amend contributions over lifetime of plans. Also precludes exact contribution levels being set out in guidance.	Amended text - now provides clarity that it is 'level (or method of calculation)' that needs to be set out in LDPs.	To respond to stakeholder views. The purpose of this part of policy remains to secure a greater level of clarity/certainty over contribution requirements in LDPs. The addition of '(or method of calculation)' gives greater flexibility.
IF policy should include requirement for LDPs to identify the types of development to contribute.	Amended text - IF policy now clarifies that LDPs are required to identify the types of development from which contributions will be required.	To provide clarity of message and respond to stakeholder views.
Concern that Infrastructure requirements may affect viability – e.g. heat networks.	No change.	Circular 3/2012 sets out that economic viability of proposals should be considered when developing planning obligations. Decisions on infrastructure requirements are the responsibility of the decision maker.
8 (b) where development creates an infrastructure need it should demonstrate how account has been taken of the Investment Hierarchy		
Clarity over how development proposals are to be assessed against infrastructure investment hierarchy. LDPs could support this process.	Amendment – the requirement to apply the Scottish Government infrastructure investment hierarchy moved to LDP section.	To respond to stakeholder views. The application of infrastructure investment hierarchy is better undertaken at the plan making stage, through development of spatial strategy.
(a) and (b) may limit delivery of rural infrastructure and housing. Will result in new development being focused around existing 'urban' provision.	No change.	IF policy is neutral on urban/rural provision. Infrastructure Investment Plan (IIP) investment hierarchy references the need to be ' <i>reflective of local infrastructure needs, such as the different level of existing infrastructure in rural and island</i>

Issue	Change	Reason/Comments
		<p><i>communities when compared to towns and cities.'</i> When applying the Infrastructure Investment Hierarchy (IIH), reference should be given to the explanatory text in IIP.</p>
8 (c) provide for infrastructure identified in LDPs and delivery programmes		
<p>This may lead to development proposals being supported on the basis of a relatively small contribution, even if they are contrary to other planning policies.</p>	<p>Added wording "in line with" to provide clarity.</p>	<p>To respond to stakeholder views. Adjustment made to be clear that the expectation is for a plan-led approach to be followed. NPF4 policies should be considered in the round – see 'How to Use this Document' Annex of NPF4.</p>
<p>Additional guidance to assess the sufficiency of infrastructure contributions.</p>	<p>No change.</p>	<p>Not for NPF4 content. As part of the separate review of developer contributions, consideration will be given to future guidance.</p>
<p>Clarity sought over the relationship between (c) and (d).</p>	<p>Amendment made to clarify the difference between two policies, i.e. developments in line with plan-led requirements and the need for development to mitigate its impacts.</p>	<p>To respond to stakeholder views and provide clarity of message.</p>
8 (d) development proposals should mitigate their impacts on infrastructure		
<p>Lack of flexibility for planning authorities to consider acceptable mitigation on a case by case basis.</p>	<p>Amended wording to provide greater flexibility for the source of mitigation.</p>	<p>Stakeholder/consultee request. The revised wording retains the important policy principle that impacts on infrastructure should be mitigated, but the change recognises that mitigation can come from different sources. It is for the decision maker to determine applications on a case by case basis.</p>
<p>Seek statement on continued role of Section 75.</p>	<p>No change.</p>	<p>Section 75 remains part of planning legislation. NPF4</p>

PART 3 – National Planning Policy
Draft Policy 8: Infrastructure First

Issue	Change	Reason/Comments
		does not have to repeat legislation.
Clarification of use of planning obligation tests.	Amended text - planning obligation tests 'will apply'.	Clarity of message. Removed reference to tests 'should be met'. Circular 3/2012 contains relevant policy.
The relevant tests should be set out in the Draft NPF4 or cross references to the relevant circulars included.	Amended text - detail of planning obligation and planning condition tests included.	To respond to stakeholder views and provide clarity of message.
Development proposals should go beyond 'mitigation' and seek to 'enhance infrastructure'.	No change.	In the context of securing planning obligations, the relevant tests apply.
Remove legal requirement on planning obligations - allow their usage to deliver large-scale infrastructure.	No change.	NPF4 does not replace Circular 3/2012, which contains policy on planning obligations, including the tests governing their use. As part of the separate review of developer contributions, consideration will be given to future changes required or guidance needed.
Clarity sought for planning authorities/ developers, in terms of level of mitigation/ contributions considered reasonable.	No change.	Should be considered on a case by case basis. IF policy is clear that impacts of development proposals should be mitigated. Further clarity cannot be given as it is project specific.
The approach to mitigation of infrastructure impacts in rural areas should be tailored to local circumstances/support rural repopulation.	No change.	IF policy is clear that impacts of development proposals should be mitigated. It is for the decision maker to determine the appropriate extent of mitigation. Further clarity on how to apply this in rural areas cannot be given as it is project specific.

Policy 9: Quality homes

Summary of representations

Aspects that respondents liked included that there is more of a focus on deliverability and that the overall approach has the potential to reduce the variety of approaches taken across planning authorities. A different perspective was that as drafted the policy contains a range of definitive statements, which if taken on their own, could be used to justify inappropriate development.

A number of respondents noted the lack of reference to Housing to 2040, and there was a concern that it is not clear how NPF4 links to its ambitions. There were also a range of concerns relating to the setting of Minimum All-Tenure Housing Land Requirements and to managing the deliverable Housing Land Pipeline. A number of respondents also raised concerns about the lack of priority given to the housing needs of older and disabled people.

Overview of changes

This is Revised NPF4 Policy 16 'Quality homes'. This policy has been revised. Having weighed up contrasting arguments, the changes aim to provide clarification, rather than a significant change to our position in the draft. This includes a shift towards clear support for housing development on land identified in the Local Development Plan, further explanation, more flexibility around requirements for a statement of community benefit, and further clarity on how planning authorities can vary affordable housing contributions.

Issues raised and changes made

Issue	Change	Reason/Comments
The new policy will repeat what were described as the failures of NPF3 to deliver affordable quality housing.	The affordable housing policy has been strengthened to require at least 25% of market sites to be delivered as affordable housing. There is provision for smaller scale proposals for affordable homes which are not allocated in the plan.	This policy is a distinct, new approach to planning for new homes which intends to encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes across Scotland to meet needs in response to criticisms of the previous approach to planning for new homes.
The policy should reference encouraging, promoting, and ensuring delivery of homes across different tenures and by a range of providers.	No change.	The policy supports development proposals for new homes across different tenures which improve affordability and choice (Revised NPF4 Policy 16(c) 'Quality homes').

PART 3 – National Planning Policy
Draft Policy 9: Quality homes

Issue	Change	Reason/Comments
LDPs should allocate land for specific tenures including social, affordable, self-build and community or public-led housing only.	No change.	<p>The draft LDP Guidance provides direction on the process of preparing LDPs. Paragraph 352 states “where appropriate there should be a mix of scales of sites in a range of locations to support a balance of tenures and dwelling types”.</p> <p>The Local Housing Land Requirement (LHLR) is an all tenure requirement, and land should be allocated in the LDP to meet the LHLR. The policy states that diverse needs and delivery models should be taken into account across all areas.</p> <p>The majority of sites will not be single-tenure, but will include a mix of tenures (for example market and affordable homes).</p>
Not enough emphasis on sustainability.	No change.	<p>The Quality Homes policy does not repeat what is included in other parts of NPF4. NPF4 must be read as a whole.</p> <p>There are a number of policies across NPF which relate to sustainability and are relevant to the delivery of new homes, including tackling the climate and nature crises, climate mitigation and adaptation, sustainable transport, and design, quality and place, amongst others.</p>
A new policy of building reuse first should be developed.	No change.	Revised NPF4 Policy 9 ‘Brownfield, vacant and derelict land and empty buildings’ supports development proposals that will result in the sustainable reuse of

Issue	Change	Reason/Comments
		brownfield land including vacant and derelict land and buildings.
Recognise and encourage a significant contribution to housing targets to be made by existing empty homes, or buildings not currently used for residential purposes, being returned or converted to use as homes.	No change.	The Revised NPF4 Policy 16 'Quality homes' relates to proposals for new homes, and policy for the preparation of LDPs in relation to new homes. The Local Housing Strategy is the more appropriate place to consider bringing housing back into effective use through remodelling and rehabilitation of existing properties.
Providing for alternative models of housing such as Smart Clachans.	No change.	LGHP Committee Request. Support is provided for proposals for new homes that improve affordability and choice: this includes self-provided homes, which includes self-build housing, custom-build housing and collective build housing.
9 (a) LDP to identify a Housing Land Requirement which at least meets the 10 year Minimum All Tenure Housing Land Requirement		
Lack of clarity regarding housing target, MATHLR and Housing Land Requirement.	Amended text to add clarity on statutory housing target and 'Local' added to 'Housing Land Requirement' to remove confusion between terms for NPF and LDPs.	To respond to stakeholder views.
Call for mechanism to trigger a review of the Housing Land Requirement if under-delivery is a persistent issue.	No change.	Annual Housing Land Audit and two-yearly Delivery Programme to monitor delivery of Local Housing Land Requirement via the pipeline. The 2019 Act provides for amendment and review of plans. We will consider further as Regulations are prepared. To inform such action, flexibility is needed

PART 3 – National Planning Policy
Draft Policy 9: Quality homes

Issue	Change	Reason/Comments
		in order to respond to the wider context rather than a rigid trigger. We will work with stakeholders on guidance for HLAs and LDPs.
A reserve of deliverable sites should be maintained and come forward earlier if the pipeline under-delivers.	Amended text - timescales have been clarified (short/medium /long & beyond 10 years) and provision made to consider earlier delivery of sites from the long term and areas beyond 10 years where other sites are not delivering as programmed.	To respond to stakeholder views.
9 (b) deliverable housing land pipeline		
Lack of clarity on deliverable housing land pipeline.	Added definition and purpose. Time-scales clarified. Delivery Programme location confirmed. Role of annual Housing Land Audit clarified.	To respond to stakeholder views.
Request for unallocated sites to be permitted where delivery is not as expected in the pipeline (<i>behind schedule</i>).	Clarity has been added on what land can come forward when delivery is not as programmed.	To respond to stakeholder views. Quality Homes policy promotes a plan-led system. Aim of the policy is to incentivise delivery through a planned approach. Policy later provides support for new homes on unallocated sites where delivery of sites is happening earlier than identified in the pipeline.
Policy should refer to 'supply' rather than 'pipeline' as a technical term that relates to established planning procedures and policy.	No change.	This policy is a distinct, new approach to planning for new homes and should not be confused with the previous approach or terminology. The new policy includes new terms to prevent confusion with the previous approach/terms.

Issue	Change	Reason/Comments
Local authorities do not control the rate of house building other than their own developments: avoid imposing a requirement that is not within their remit.	No change.	Planning authorities have a duty to prepare an LDP and NPF4 policy sets out expectations for the LDPs. A collaborative effort is required to achieve delivery with all stakeholders playing their role, including identifying a deliverable housing land pipeline.
Policy will not address LDPs not allocating enough deliverable housing land to meet need and demand.	No change.	The new approach to delivering quality homes includes new policy in NPF4 and new processes relating to LDPs, Delivery Programmes and Housing Land Audits. Some stakeholders have recognised the delivery focus of the new policy approach in NPF4.
Call for mechanism to bring forward longer term or unallocated sites: suggestion of percentage buffer.	No change.	Quality Homes policy promotes a plan led system. Change in policy approach focuses action on delivery instead of conflict over precise numbers or percentages. Flexibility is needed in order to respond to the wider context rather than a rigid trigger. We will work with stakeholders on guidance for HLAs and LDPs.
Clarity on site de-allocation – frequency, process and evidence required.	No change.	LDP Guidance provides further information on plan preparation and review.
Reference should be to the Delivery Programme and Housing Land Audit being used to ‘monitor’, not ‘manage’, the development pipeline.	Amended text to clarify.	To respond to stakeholder views.
9 (c) land should be allocated to meet the Housing Land Requirement		
Definition of ‘sustainable locations’ needed.	Amended wording of policy to refer to “locations that	References causing confusion

Issue	Change	Reason/Comments
	create quality places for people to live” to add clarity.	removed/amended in response to stakeholder views.
9 (d) Development proposals for homes should be high quality and contribute towards making great places		
Terms like ‘high quality’ and ‘great places’ are subjective.	Amended wording to focus on a plan-led system and Key policy connection to design, quality and place added.	To respond to stakeholder views. LDPs to promote quality development through being place-based, people-centred and delivery-focused. NPF should be read as a whole, including policy on quality development.
Lacks any meaningful detail which could be used to assess whether proposed housing is adaptable to changing and diverse needs and lifestyles.	Reinforced the affordability and choice policy (Revised NPF4 Policy 16(c)) to refer to adaptability.	With an ageing population, and to support disabled people to live in their own home, it is important that people live in homes which are able to adapt to their changing needs.
NPF4 would benefit from design guidance that reinforces the commitment to delivering high quality homes set out in Housing to 2040, including by identifying how the planning framework will support these efforts.	No change	NPF4 must be read as a whole. Revised policy 14 ‘Design, quality and place’ supports the delivery of places that consistently deliver healthy, pleasant, distinctive, connected, sustainable and adaptable qualities.
9 (e) Statement of Community Benefit		
Application -comments on who to be involved in preparation, what should be included and size of development to be applied to.	Amended wording to provide for flexibility for smaller developments where appropriate.	We will work with stakeholders to consider application in practice.
9 (f) Support for proposals for new homes that improve affordability and choice		
Content not sufficient to meet requirements of the Act in relation to housing for older and disabled people.	Expanded explanation on outcomes to provide further evidence of how the statutory requirements are met.	To respond to stakeholder views. The policy already promotes affordability and choice and the adaptability of homes to changing and diverse needs. This includes accessible, adaptable and wheelchair

PART 3 – National Planning Policy
Draft Policy 9: Quality homes

Issue	Change	Reason/Comments
		accessible homes, and homes for older people including supported accommodation, care homes and sheltered housing.
Minimum 10% of new build homes should be wheelchair accessible.	No change.	Policy supports proposals for accessible, adaptable and wheelchair accessible homes. Local Housing Strategies contain targets for delivery of wheelchair accessible housing.
Call for NPF4 to support and promote the community-led housing approach further.	No change.	NPF4 supports proposals for new self-provided homes, which includes collective build housing.
NPF4 should consider what high quality homes look like for younger people and the services they need.	No change	NPF4 must be read as a whole. Other policies relate to younger people including Revised Policy 21 on play, recreation and sport, and also Policy 15 on Local living and 20 minute neighbourhoods.
9 (g) Proposals for Gypsy/Traveller and Travelling Showpeople accommodation on land not identified for this use		
Policy should not include text that is biased against Gypsy/Traveller/ Travelling Showpeople communities or be less flexible than policy for other types of homes.	Amended policy to give parity with the exceptions policy for housing for settled communities and to ensure no unintended bias is included.	To respond to stakeholder views. Reworking of policy ensured it is based on decision making and the plan-led system rather than on value judgements of the type of accommodation.
Terminology should reflect Travelling Showpeople yards and Gypsy/Traveller sites/family yards for accuracy.	Amended policy to represent community definitions of accommodation more accurately.	To respond to stakeholder views.
Requests to include human rights and equalities legislation references.	Added reference to human rights and equality.	To respond to stakeholder views.
9 (h) – affordable homes in areas where there is an identified requirement		

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Draft Policy 9: Quality homes

Issue	Change	Reason/Comments
Query over what is meant by 'area' and what the 'requirement' refers to.	Amended policy wording to remove ambiguous terms and to add clarity. 'Identified requirement' changed to 'identified need' to align with terminology of HNDA process.	To respond to stakeholder views.
Concerns about change from SPP "no more than 25%" to NPF "at least 25%".	No change.	Flexibility built into policy to increase or decrease the 25% figure with an evidence-based approach. Mix of views - a number of responses support the policy.
Flexibility to increase/decrease affordable housing percentage will encourage variation and produce a mosaic of requirements, creating uncertainty and confusion.	No change.	Affordable housing delivery cannot be achieved through a one-size-fits-all approach. NPF4 sets out a percentage of at least 25% but provides important flexibility for this to be decreased or increased where there is local justification, in an evidence based approach.
Current text could be interpreted to mean that affordable housing is required even if there is no justification for it.	Text clarified to refer to 'identified need'.	The first sentence of Revised NPF4 Policy 16(e) 'Quality Homes' includes 'to meet an identified need'. This sets the context for the whole policy: 'makes provision for' can apply to proposals for market homes as well as affordable homes.
A definition of the limits of locations and circumstances where lower contribution may be appropriate is required, particularly in complex cross boundary market areas and where joint HNDAs are required.	No change.	The policy provides flexibility for the LDP to set out locations or circumstances where a lower contribution is justified. This will be evidence-based and specific to each area.
Serviced land as affordable housing contribution not widely	Removed reference to the provision of serviced land. Text now expects contributions to be provided	To respond to stakeholder views.

Issue	Change	Reason/Comments
used at present – suggest change.	in accordance with local policy or guidance.	
9 (i) New homes on land not identified for housebuilding		
Request for less ambiguous wording – particularly ‘exceeding delivery timescales’.	Amended policy wording to add clarity/remove ambiguity, including ‘delivery happening earlier than identified in the pipeline’.	To respond to stakeholder views.
Concerns policy too limited & suggest permitting housing on unallocated sites where there are not enough deliverable short and long term sites to meet the HLR or where sites are consistent with the site assessment methodology confirmed in the Evidence Report.	No change.	The Quality Homes policy promotes a plan-led system. The aim of the policy is to incentivise delivery rather than non-delivery. The policy allows for proposals for new homes on land not identified for housebuilding to be supported where delivery of sites is happening earlier than identified in the pipeline.
Use of ‘or’ at third bullet suggests proposals would not have to be consistent with spatial strategy/ other relevant policies.	Amended policy bullet list formatting for clarity.	To respond to stakeholder views.
Concern that if policy applies to brownfield windfall sites, it will be overly restrictive.	No change.	NPF4 is to be read as a whole. Revised NPF4 Policy 9 ‘Brownfield, vacant and derelict land and empty buildings’ supports the reuse of brownfield land and buildings. Brownfield policy referenced in Key policy connections.
Call for mechanism to enable unallocated sites if delivery exceeds or falls short of the pipeline: suggestion of a percentage buffer.	Added text to clarify the route to establishing whether delivery is happening earlier than identified in the deliverable housing land pipeline.	To respond to stakeholder views. Quality Homes policy promotes a plan led system. Change in policy approach focusses action on delivery instead of conflict over precise numbers or percentages. Flexibility is needed in order to respond to the

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Draft Policy 9: Quality homes

Issue	Change	Reason/Comments
		wider context rather than a rigid trigger. We will work with stakeholders on guidance for HLAs and LDPs.
9(j) Householder development		
Householder applications should be dealt with through LDP design policies, not a national planning document.	No change.	NPF4 is part of the Development Plan together with the LDP. Local policy and guidance may include policy which reflects local circumstances.
Clarification sought on policy wording.	Divided policy to add clarity.	To respond to stakeholder views.

Policy 10: Sustainable travel and transport

Summary of representations

Most of those commenting supported the principle and overall direction set out, although there were concerns that some parts may not be workable in rural and island communities. There were also calls for clearer financial commitments to provide the investment required to support the policy, especially around active travel and public transport infrastructure, and achieving a modal shift from private car use.

Overview of changes

This is Revised NPF4 Policy 13 'Sustainable transport'. The policy has been reframed to focus on positive changes to support sustainable modes, rather than focusing solely on a reduction of unsustainable travel. The policy has been supplemented to make reference to including equalities groups in the earliest stages of decision making.

Further consideration has been given to the applicability of the policy in rural areas and the Glossary entry for sustainable travel hierarchy clarifies how it applies in rural areas.

Issues raised and changes made

Issue	Change	Reason/Comments
Concerns that the policy is urban centric and not realistic in rural/ island areas and that it will be problematic to use it as a reason for refusal (in particular policy relating to significant travel generating uses).	Amended rural policy now indicates that the transport needs should be taken into account as appropriate for the rural location. The Glossary entry for 'sustainable travel' has been amended to reflect that in some areas, particularly rural, the top three tiers may be judged as unfeasible and there will remain a role for electric vehicles and shared transport options.	To provide clarity of message and respond to stakeholder views.
Calls for clearer financial commitments to provide the investment required. Low cost transport should be available to those on low incomes.	No change.	NPF4 is not an investment programme. The Delivery Programme sets out a proposed approach to improve alignment with wider investment programmes.
Request for references to other documents such as	No change.	NPF does not refer to documents which may become dated/superseded

PART 3 – National Planning Policy
Draft Policy 10: Sustainable travel and transport

Issue	Change	Reason/Comments
'Cycling by Design' and 'Designing Streets.'		during the lifetime of the framework.
References to RSS and RTS.	RSS are referenced in NPF4 and explained in the Glossary. Reference has been added to RTS in the 'How to Use this Document' Annex.	Regional Transport Strategies and local transport strategies may be material considerations in decision making. LDP guidance can make reference to RTS and we are working with Transport Scotland on aligning LTS and LDP guidance.
Concern that the policy overly focussed on passengers over freight. Need to allocate land for rail freight hubs – safeguarding in LDPs. Existing terminals should be protected.	Added reference to mode shift of freight from road to rail and last mile delivery. Amended wording to widen emphasis to the movement of people and goods.	To respond to stakeholder views. LDP guidance will refer to LDPs looking at freight issues at an authority wide level and consider issues of freight transfer and safeguarding.
Lack of reference to the importance of Scotland's airports for external connectivity, especially in comparison to Scottish Planning Policy (2014).	Amended text in 'productive places' section to re-emphasise the importance of external connectivity for both passengers and freight and the importance to the wider Scottish economy.	To respond to stakeholder views.
10 (a) LDPs should be aim to reduce the need to travel unsustainably by prioritising locations for future development		
Requests for the policy to be more positively worded, e.g. not simply reducing and mitigating unsustainable modes but actively supporting delivery of a mode shift.	Amended wording throughout to reflect this change in emphasis.	To respond to stakeholder views.
Reducing unsustainable travel should be reflected elsewhere in NPF4.	No change.	This is a key driver of several other policies including Revised NPF4 policies: 15 'Local living and 20 minute neighbourhoods'; 27 'City, town, local and commercial centres; and 28 'Retail'. The spatial principles also cover local living.

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Draft Policy 10: Sustainable travel and transport

Issue	Change	Reason/Comments
Calls for a definition of the term 'sustainable transport' and views expressed that this should include electric vehicles especially in rural areas to make the policy viable.	Added definition of sustainable travel to Glossary. Clarifies that sustainable transport refers to the top three tiers of the STH. In rural areas these top three tiers may not be feasible. There will remain a role for the private cars, including electric vehicles.	To respond to stakeholder views and provide clarity of definition.
LDPs should be required to identify potential for retrofitting sustainable transport infrastructure.	No change.	Whilst it is recognised that this could provide benefits, it is not considered to be precluded by the broader policy intent, outcomes and text. Local Transport Strategies will identify projects for transport improvements and the LDP guidance will call for close links between LDPs and the LTS for the area.
a) and b) should be merged.	Amended policy combines requirements for LDPs.	To respond to stakeholder views.
10 (b) LDPs should be informed by an appropriate and effective transport appraisal undertaken in line with DPMTAG		
Appraisal mechanisms will need to ensure that co-benefits can be captured in analysis performed to guide decision-makers.	No change.	Appraisal mechanisms are covered in Transport Scotland guidance, updating of Transport Scotland guidance is outwith the scope of NPF4.
Strengthen by making clear that developments not supporting the sustainable travel hierarchy will not be approved.	Amended wording at Policy 13b which supports proposals which have been considered in line with the sustainable travel hierarchy	To respond to stakeholder views. There also needs to be flexibility to local circumstances especially in rural areas.
Remove references to DPMTAG and DMRB as they are outdated guidance. Calls for the guidance to be updated as a matter of urgency. Some responses highlighting how the process is expensive and could be streamlined.	Amended text. Reference is now made to relevant transport appraisal guidance. Updating of Transport Scotland guidance is outwith the scope of NPF4.	To respond to stakeholder views.

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Draft Policy 10: Sustainable travel and transport

Issue	Change	Reason/Comments
Need to set out the sustainable travel and investment hierarchies.	No change.	These are set out in National Transport Strategy 2 and in the Glossary.
Make clear links to policy on local living and rural places.	Addition of key policy connections includes local living, rural homes and rural development.	NPF4 should be read as a whole, to avoid unnecessary duplication.
Reference cross-boundary movement and partnership working through RSS.	The How to Use this Document Annex highlights regional spatial priorities should be considered through LDPs and where appropriate RSS and Regional Transport Strategies, including in working in partnership with others.	The spatial strategy highlights strategically important connections. To respond to stakeholder views.
10 (c) a transport assessment is required where a development or change is likely to generate a significant increase in person trips		
Clarity on the recommended approach to transport assessment.	Amended, revised wording indicates transport assessments should be undertaken in accordance with the relevant guidance.	To respond to stakeholder views.
10 (d) significant travel generating uses and Travel Plans		
Monitoring of travel plans should be linked to targets set by LDPs and LTSs.	No change.	The policy wording refers to monitoring and evaluation of travel plans. Proposals for monitoring will be subject to the circumstances of the proposal.
10 (e) affect the operation and safety of strategic transport network		
Clarification on whether capacity of existing infrastructure and mitigation are expected to be identified through a transport assessment and whether it refers only to Transport Scotland (TS) interests.	No change.	Transport assessments should be undertaken in accordance with the relevant guidance. See Glossary entry.
Expand to consider proposals that may affect any part of the transport network.	Revised policy 13b applies to all proposals, it sets out that proposals will be supported where they are considered in line with the sustainable travel	To respond to stakeholder views.

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Issue	Change	Reason/Comments
	hierarchy it also indicates proposals. It will be designed to incorporate safety measures.	
10 (f) new junctions on trunk roads		
Resource still going into road network. This should not be the case if net zero targets are to be met. Whilst other responses looking for road investment to continue. New junctions on trunk roads is a function of TS and should not be included in this policy.	No change.	Transport Scotland has a duty to maintain a safe trunk road network. Retained policy on new junctions. Early conversations required between TS and the developer to deliver new junctions.
10 (g) proposals should put people and place before unsustainable travel		
Support for references in the policy to blue and green infrastructure. Calls for this to be expanded to include green bridges.	Amended text - reference to blue green infrastructure has been relocated further up the policy to give it more emphasis. It has also been expanded to include examples such as natural planting or water systems.	To respond to stakeholder views. Green bridges can be captured under the policy which encourages proposals which build in resilience to the effects of climate change and incorporate green infrastructure and natural habitats.
Provide clarity on application in rural areas with poor existing travel infrastructure.	Amended text refers to the sustainable travel hierarchy which promotes a place based approach, working through the levels as appropriate to the place. The new Rural Development policy 29b provides that development proposals in rural areas should take into account the transport needs of the development as appropriate for the rural location.	To respond to stakeholder views.
10 (h) locations which would increase reliance on the private car		
Amend h) to remove reference to 400m and refer to Sustainable Travel Hierarchy.	Removed this reference. Emphasis is placed on the Sustainable Travel Hierarchy and contribution	To respond to stakeholder views. Considered more appropriate for the

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Issue	Change	Reason/Comments
	to 20 minute neighbourhoods and local living. The Glossary definition of these terms provides more information.	distance to be removed, to reflect the policy shift to local living and 20 minute neighbourhoods.
Need to emphasise Scottish Government's target of reducing car km by 20%. This requires not only avoiding increasing reliance on the private car, but also actively reducing it. The Framework should mention schemes to actively reduce car usage, such as low-traffic schemes, occupancy requirements and parking restrictions.	Amended policy refers to government reduction targets. Amended wording shifts emphasis away from avoiding unsustainable travel towards actively reducing it. Widened policy on parking to reflect these suggestions of other schemes to reduce car usage.	To respond to UK Climate Change Committee. The specific 20% reduction target has not been mentioned in the policy as they may be achieved/ superseded over the course of the life of NPF4. This will be relevant in the updating of associated Transport Scotland guidance.
Many consultation responses highlighted the need to consider inequalities issues associated with restricting car use and promoting active travel.	Amended text at Revised NPF4 Policy 13((b)(vii)) and (e) 'Sustainable transport' to emphasise the needs of users of all abilities and to ensure disabled people do not face additional barriers from low car policies. Policy states that the transport needs of all users including those with protected characteristics should be considered at the earliest stages in the design of new development.	To respond to Committee (NZET) and stakeholder views. LDP guidance will also set out how equalities groups should be involved in the early stages of plan development. The Sustainable Travel Hierarchy has been developed to be relevant to people with varying transport needs.
10 (i) sustainable travel and investment hierarchies; integrate transport modes; access by reliable public transport; provision of electric, hydrogen and other low or zero-emission vehicle and cycle charging points		
Call for more emphasis on public transport including connectivity and multi-modality. Views expressed that present services are inconsistent and not a viable solution to sustainable travel.	No change.	Existing policy supports proposals in locations which can be accessed by sustainable travel modes. Planning decisions are required to consider the infrastructure investment hierarchy and NPF4 takes an 'infrastructure first'

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Issue	Change	Reason/Comments
<p>Concerns that existing public transport infrastructure and investment is inadequate to present public transport as a viable alternative to the car in many parts of Scotland. S75 should be used to support and contribute to sustainable travel projects.</p>		<p>approach. The NPF4 Delivery Programme will give greater focus to aligning plans and strategies to identify where additional benefits can be made from existing committed investment. Transport infrastructure investment comes from a number of sources including both national and local government funding as well as developer contributions. Regional Transport Partnerships' delivery mechanisms, prioritisation and funding are addressed through proposed Scottish Government/Transport Scotland/RTP/CoSLA liaison arrangements, liaison with private sector partners, Community Planning Partnerships and the travelling public, and regional action as appropriate.</p>
<p>Policy needs to encourage other ownership models. Car clubs and shared transport as a viable alternative to car ownership.</p>	<p>Added Glossary entries for Sustainable Travel Hierarchy and 'sustainable travel' include reference to shared transport and highlight its role. Retained reference to shared transport in the LDP section.</p>	<p>To respond to stakeholder views. Shared modes are not included in the NTS2 definition of sustainable travel.</p>
<p>Calls to align electric vehicle charging with renewable energy sources.</p>	<p>Amended policy states that electric vehicle charging infrastructure including electric vehicle forecourts should be supported where fuelled by renewable energy.</p>	<p>To respond to stakeholder views.</p>
<p>Call for separate guidance to local authorities on</p>	<p>No change.</p>	<p>UK Climate Change Committee request. Rollout of EV is being progressed by Transport</p>

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Issue	Change	Reason/Comments
<p>(i) how many EV chargers are likely to be needed, and when; and (ii) how to appraise and quantify the co-benefits offered by sustainable transport (e.g. congestion, air quality, and health impacts, plus emissions reductions), beyond the classical metrics such as travel time and economic connectivity (which often favour car travel).</p>		<p>Scotland/Building Standards Division. Building Standards consulting on legislative requirements for EV chargers in new developments. Work on permitted development rights to enable roll out of charging infrastructure is ongoing, consultation completed and responses being analysed.</p>
<p>Mixed views on references to Hydrogen vehicles. Some supportive of this as an alternative to cars. Other respondents pointing out that Hydrogen charging was not feasible at the development scale.</p>	<p>Removed references to Hydrogen vehicles in favour of zero carbon vehicle charging.</p>	<p>Clarity of message and to build in longevity to the policy.</p>
<p>10 (j) active travel infrastructure or public transport and multimodal hubs</p>		
<p>More needs to be done for active travel to be a practical alternative to road transport, especially in rural areas. - including; making them part of wider green routes, requiring LDPs to have active travel policies and powers to assemble land for infrastructure.</p>	<p>No change.</p>	<p>LDP guidance will cover active travel considerations at the plan wide level. National development on walking and cycling considers wider network. Existing policy refers to new transport routes as an opportunity for green infrastructure.</p>
<p>Authorities should be encouraged to use planning obligations to deliver active travel projects and car clubs.</p>	<p>No change.</p>	<p>It is for decision makers to consider the content of planning obligations in line with policy tests.</p>
<p>10 (k) consider the needs of users of all ages and abilities</p>		
<p>Many consultation responses highlighted the need to consider inequalities issues associated with restricting car use and promoting active travel.</p>	<p>Amended text at Revised NPF4 Policy 13((b)(vii)) and (e) 'Sustainable transport' to emphasise the needs of users of all abilities and to ensure disabled people do not face additional barriers from low car policies.</p>	<p>To respond to Committee (NZET) and stakeholder views. LDP guidance will also set out how equalities groups should be involved in the early stages of plan development.</p>

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Draft Policy 10: Sustainable travel and transport

Issue	Change	Reason/Comments
	Policy states that the transport needs of all users including those with protected characteristics should be considered at the earliest stages in the design of new development.	The Sustainable Travel Hierarchy has been developed to be relevant to people with varying transport needs.
10 (l) cycle parking		
Secure and accessible cycle parking and e-charging points for powered mobility devices.	Added reference to cycle charging points. It is considered that the policy fulfils this and no further amendment is required.	To provide clarity.
10 (m) proposals which are ambitious in terms of low/no car parking		
Calls for lower parking standards in areas well served by sustainable modes. Some calls for restrictions on one space per home in new developments whilst others concerned about the impact of restricting parking for visitors/deliveries/disabled users. Support for car share as a means to enable fewer private parking spaces.	Amended emphasis to a place-based approach to parking for clarity of message. Place-based considerations mean a national level approach to car parking is not appropriate. Retained policy support for low/no car parking options. Added reference to low traffic schemes and bus cycle priority schemes.	To respond to stakeholder views and provide clarity of message.
Clarification on whether previous parking standards are being retained. Consistency on parking requirements required.	National level parking standards in SPP are not being carried forward. Amended policy promotes a place-based approach to car parking provision, with support for low and no car parking developments.	Clarifying query from stakeholders. Given the differences in circumstances, some locations can support lower parking standards, and a national approach is not appropriate.
Need for safe routes to enable disabled and elderly to walk wheel and cycle. Blue badge parking close to entrances.	Amended parking policy in response to consultation to state that low/no parking developments should not create barriers to access for disabled people. Retained reference to the safety and inclusivity of sustainable travel and given priority as a policy outcome.	To respond to stakeholder views. The exact location of blue badge parking is a matter for local decision making. Policy encourages a place based approach to this so solutions may differ in different scenarios.

Policy 11: Heat and cooling

Summary of representations

There was reference to the contribution that this policy can make to the decarbonisation of heat. Reference was made to the Heat in Buildings Strategy, and there were calls for greater consideration of the affordability of zero emissions heat and cooling, for example through links to the Fuel Poverty Strategy. Others raised issues regarding the potential scale of resources required, for example in the assessment of technical proposals.

Overview of changes

This is Revised NPF4 Policy 19 'Heat and cooling'. Some technical changes have been made to the policy which has also been rationalised to improve clarity. Reference to domestic biomass energy systems have been removed, based on consultation responses that highlighted the New Build Heat Standard, which will come into effect 1 April 2024, as a more appropriate means to determine what heat systems within buildings should be supported.

Issues raised and changes made

Issue	Change	Reason/Comments
Calls for greater consideration of affordability, for example through links to the Fuel Poverty Strategy.	Revised NPF4 Policy 11 'Energy' sets out support for all forms of renewable, low-carbon and zero emissions technologies, whilst at the same time, Revised NPF4 Policy 19 'Heat and cooling' encourages, promotes and facilitates development that supports decarbonised solutions to heat and cooling demand and adaptation to more extreme temperatures.	To respond to NZET Committee. We recognise that addressing fuel poverty will require greater energy efficiency and affordable, low carbon, distributed heat and electricity networks.
Calls for clarity on the anticipated role of the policy in relation to the role of Building Standards.	Amended policy wording as detailed below.	Building Standards will complement the delivery of the policy.
NPF4 should better recognise what were seen as commercial, practical and viability constraints on the integration of heat networks with new residential developments.	Policy d) has been removed and the suite of policies a) to i) have been rationalised to improve clarity.	To respond to stakeholder views.

PART 3 – National Planning Policy
Draft Policy 11: Heat and cooling

Issue	Change	Reason/Comments
Further detail on the role of low carbon heat pumps, particularly in replacing fossil fuel and wood-fire domestic heating.	No change.	The New Build Heat Standard would be a more appropriate means to determine what zero emission heat system within buildings should be supported.
Greater emphasis on the retrofitting of existing buildings and heat networks.	Whilst previously included, Revised NPF4 new policy 19(b) 'heat and cooling' expressly sets out that proposals for retrofitting a connection to a heat network will be supported.	To respond to stakeholder views.
11 (a) LDPs should take into account the area's LHEES and areas of heat network potential and any designated HNZ when allocating land		
Support for the integration of heat networks into planning policy, including the expectation that LDPs consider the area's Local Heat and Energy Efficiency Strategy and heat network zones for new buildings, existing building retrofit and energy infrastructure. Clarification sought whether this is an expectation or a requirement.	Revised NPF4 Policy 19(b) 'heat and cooling' sets out that proposals for retrofitting a connection to a heat network will be supported.	To respond to UK Climate Change Committee.
11 (b) connect to existing heat networks		
Missed opportunity to include proposals to convert existing heat networks to low-carbon sources or to expand existing heat networks.	Revised NPF4 Policy 19 'Heat and Cooling' new wording makes clear policy intent to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand.	To respond to UK Climate Change Committee. Detailed proposals are outwith the scope of NPF4.
11 (c) locations where a heat network is planned		
Some concerns were raised around the role of heat networks, with some thinking the policy was too narrowly focused on technology and others felt there would be constraints on heat networks in areas of lower density.	No change.	The policy has been aligned with the Heat Networks (Scotland) Act 2021 which requires a local authority to determine where there are areas that are most appropriate for the development of heat

Issue	Change	Reason/Comments
		networks and where the opportunities are greatest.
On 11 (c), (e) & (f) there were calls for guidance in relation to (c) exceptions to be added to policy (e) with a range of suggested changes and additional considerations noted in relation to policy (f).	Rationalised wording to make the policy easier to understand.	To respond to stakeholder views.
11 (d) proposals with no demonstrable effective solution to connecting to a heat network		
Calls for greater prominence on the role of low carbon heat pumps contributing to heat decarbonisation and on the retrofitting of existing buildings and heat networks. Respondents also outlined that several aspects of 11(d) required further clarity.	Removed draft policy 11(d).	The New Build Heat Standard is expected to set out how the Scottish Government will regulate the use of zero direct emissions heating, such as heat pumps.
11 (e) national/major development with waste heat should be co-located in areas of heat demand, and include a heat and power plan for use of waste heat		
Concerns regarding the potential for the co-location of national and major development to adversely affect residential amenity and safety.	Revised NPF4 Policy 19(d) 'heat and cooling' now sets out support providing wider considerations, including residential amenity, are not adversely impacted.	To respond to stakeholder views.
11 (f) energy infrastructure proposals should take account of heat maps and zoning		
Some respondents wanted to see 11 (f) set out a wider range of considerations for energy infrastructure proposals.	New Revised NPF4 Policy 19(e) combines Draft NPF4 policy criteria 11(f) and (h) and more clearly sets out the considerations to be applied.	To improve clarity.
11 (g) domestic biomass energy systems		
Mixed views regarding domestic biomass energy systems. Whilst some called for a tightening of policy, others called for more clarity, felt this was a matter better delivered through building standards	Removed draft policy 11(g).	To respond to stakeholder views. The New Build Heat Standard is expected to set out how the Scottish Government will manage bioenergy systems in new builds.

Issue	Change	Reason/Comments
or otherwise raised concerns about implementation.		
11 (h) development proposals should be supported where they repurpose former fossil fuel infrastructure for low carbon energy		
Most of those commenting sought clarity on aspects of 11 h).	New Revised NPF4 Policy 19(e) combines Draft NPF4 policy criteria 11(f) and (h) and more clearly sets out the considerations to be applied.	This is still an emerging technology and development proposals will have to be carefully considered by decision makers on a case by case basis.
11 (i) reduce overheating and reliance on air conditioning systems		
Support for the requirement for development proposals to reduce overheating, prioritising natural or passive solutions.	Minor drafting changes to provide greater clarity.	To respond to UK Climate Change Committee.

Policy 12: Blue and green infrastructure, play and sport

Summary of representations

Most respondents were supportive of the policy, although it was suggested that ‘blue and green infrastructure’ should be separated from ‘play and sport’. Some respondents addressed the issues of ‘overall integrity’ and ‘net loss’ and there were concerns that if small amounts of fragmentation are allowed, over time the impact will be cumulative.

Overview of changes

This is Revised NPF4 policies 20 ‘Blue and green infrastructure’, and 21 ‘Play, recreation and sport’. This policy was widely supported but has been amended to clarify its application. We have also separated blue and green infrastructure (BGI) from play and sport in recognition of their different roles and to better reflect their respective importance in ensuring wellbeing for the environment, place and people. The separate policy on play, recreation and sport reflects the importance of outdoor leisure opportunities for people of all ages.

Issues raised and changes made

Issue	Change	Reason/Comments
Policy would benefit from being split into two separate policies: one for blue and green infrastructure and the other for play and sport.	Split policy into two: new Revised NPF4 policies 20 ‘Blue and green infrastructure’ and 21 ‘Play, recreation and sport.’	To respond to stakeholder views. The two separate policies help in improving clarity of their respective significance. They continue to work alongside each other in promoting and enhancing accessible BGI in providing for play and recreation.
Importance of BGI’s role in SUDs and biodiversity not adequately supported in the policy criteria; and cross reference other related policies.	New section to clearly set out policy outcomes, including BGI designed to deliver multiple functions etc. New Revised NPF4 Policy 20(b) states that development proposals that incorporate such BGI will be supported.	To respond to stakeholder views. The role of individual BGI is covered in separate individual policies. A list of key policy connections is added in the new drafting structure.
Policy clauses on blue infrastructure must align with regulations governed by LA Roads departments, Scottish Water and SEPA.	Amended to include Key policy connections and the split of policy into two provides a clearer focus on BGI.	Wider issue of regulations which is not for NPF4 content. NPF4 should be read as a whole and does not repeat other legislation.

PART 3 – National Planning Policy
Draft Policy 12: Blue and green infrastructure, play and sport

Issue	Change	Reason/Comments
The policy fails in protecting access to BGI, including protection of core paths & right of access as there is in current SPP, etc.	Amended text includes the requirement for LDPs to safeguard access rights and core paths, including active travel routes, as well as enabling new access and connectivity.	To respond to stakeholder views.
Suggestion the policy would benefit from making reference to Open Space Strategies and Play Sufficiency Assessments to inform existing provisions/ networks and future needs and demands.	Direct references to both Open Space Strategy and/or Play Sufficiency Assessment inserted. Definition of Play Sufficiency Assessment added to the Glossary.	To provide clarity and respond to stakeholder views.
Various consultees have suggested the policy should ensure BGI includes natural places, woodlands and historic environments, etc., which can support play and recreation; as well as community gardens and growing spaces, etc.	Amended policy structure includes key policy connection. Policy on health and wellbeing covers community growing spaces.	BGI is as defined in the Glossary. The respective role of individual blue or green infrastructure is covered in separate individual policies. A list of key policy connections is added in the new drafting structure.
Implementation-related issues including the need for standards, an approach to assessing requirements and monitoring delivery, as well as further guidance.	No change.	Not for NPF4 content.
Add opportunities to connect with nature.	Added reference at new Revised NPF4 Policy 21(f)(ii).	To respond to stakeholder views.
Strengthen in relation to climate resilience and flood risk management.	No change. Issues addressed by other policies.	To avoid repetition. NPF4 should be read as a whole.
Require biodiversity contribution of brownfield sites to be assessed.	Added wording in policy on brownfield land includes consideration of the biodiversity value of sites.	To respond to stakeholder views.
12 (a) LDPs should identify and protect blue and green infrastructure		
Needs explicit reference to the role of BGI in nature-based solutions and biodiversity and protection of existing paths.	Other policies cover and key policy connections refer to biodiversity. Amended wording for LDPs includes	To respond to stakeholder views. NPF4 should be read as a whole, to avoid unnecessary duplication.

PART 3 – National Planning Policy
Draft Policy 12: Blue and green infrastructure, play and sport

Issue	Change	Reason/Comments
	safeguarding of access rights and core paths.	
Comment on community growing spaces and allotments as types of BGI.	Amended the definition of “Green space” in the Glossary to omit the reference to “horticultural” land as exclusion.	To respond to stakeholder views.
12 (b) LDPs should identify new, enhanced provision or improved access to play opportunities for children		
Should include specific mention of identifying and protecting ‘wild places’ for children.	No change. Definition of BGI is sufficiently broad and separation into two distinct policies on BGI and play, recreation and sport aids clarity.	The two separate policies help in improving clarity of their respective significance.
Outdoor sports facilities are part of open space and should be included.	New Revised NPF4 policy 21 ‘Play, recreation and sport’ gives more focus on outdoor sports facilities.	To respond to stakeholder views. The two separate policies help in improving clarity of their respective significance.
Embedding BGI design at early stage in terms of placemaking and provide better link to Infrastructure First Approach.	One of the key policy outcomes for Revised NPF4 Policy 20 ‘Blue and green infrastructure’ addresses this point. Further, Revised NPF4 Policy 20(b) supports development proposals that incorporate BGI and promote this to be an integral element of the design that responds to local circumstances.	To respond to stakeholder views. The revised drafting gives general support to all BGI and promotes making BGI an integral part of design, not ruling out those BGI which are good but not integral.

PART 3 – National Planning Policy
Draft Policy 12: Blue and green infrastructure, play and sport

Issue	Change	Reason/Comments
12 (c) fragmentation or net loss of existing blue and green infrastructure		
Support for the protection against fragmentation of BGI network, but question of how to assess “overall integrity”, and highlighted the importance of protecting against net loss of BGI.	The Revised NPF4 Policy 20(a) ‘Blue and green infrastructure’ is strengthened to protect against resulting in deficit. Cross reference is made to planning authorities’ Open Space Strategy to be used to inform this.	To respond to stakeholder views.
12 (d) proposals in regional and country parks		
Should reference the historic environment and cultural heritage of regional and country parks.	No change. Issues addressed by other policies.	To avoid repetition. NPF4 should be read as a whole.
12 (e) safeguarding outdoor sports facilities		
Clarity needed around which stakeholders will assess proposals and for an evidence-based approach.	No change.	Not for NPF4 content.
12 (f) loss of children’s outdoor play provision		
Loss of outdoor play provision should not be limited to formal play areas but should include loss of natural places and other open spaces where informal play occurs, and in turn, the protection against the loss of those spaces should be included in the policy.	No change to drafting in the new separate Revised NPF4 Policy 21 ‘Play, recreation and sport’. Cross reference is made for this to be informed by planning authorities’ Play Sufficiency Assessments and Open Space Strategies.	The protection against loss of individual open space types are covered in individual policies, including natural places; forestry, woodland and trees; greenbelts, etc. A list of key policy connections is added to sign-post.
Protection against loss of outdoor play provision should be extended to protect also public outdoor access to informal recreation.	Strengthened support for outdoor recreation for all ages now included in policy intent and outcomes.	To respond to stakeholder views.
12 (g) temporary or permanent open space, green space or play space on unused or under-used land		
Request for “unused or under-used land” to be defined.	Added definition to the Glossary.	To provide clarity and respond to stakeholder views.

Issue	Change	Reason/Comments
12 (h) incorporate and enhance blue and green infrastructure		

PART 3 – National Planning Policy
Draft Policy 12: Blue and green infrastructure, play and sport

Issue	Change	Reason/Comments
Needs flexibility around accessibility and for brownfield sites in meeting all the requirements set out.	Amended wording at Revised NPF4 Policy 20(b) 'Blue and green infrastructure' directs that design should respond to local circumstances and be informed by relevant strategies, including the planning authority's Open Space Strategy.	To provide clarity and respond to stakeholder views.
Reference to the objective of enhancing biodiversity would strengthen connections with wider green networks.	No change. Network connections remain a key consideration in Revised NPF4 Policy 20(b) 'Blue and green infrastructure' and new LDP section includes the role of the plan in identifying network connections. Issue of biodiversity is covered in key policy connections.	To avoid repetition. NPF4 should be read as a whole.
12 (i) major development should incorporate good quality provision for play, recreation and relaxation		
Define 'well designed' and 'good quality provision'.	No change.	Six qualities of successful places is an overarching policy covering good design principles.
Should apply to all developments.	Removed reference to national and major developments.	To provide clarity and respond to stakeholder views.
Consider creation, restoration and enhancement of wild places close to new developments.	No change. Issue covered by Key policy connections/ other policies.	To avoid repetition. NPF4 should be read as a whole.
12 (j) development proposals that include new public streets and public realm		
Comment raised regarding review and update of Designing Streets policy statement.	Removed reference and replaced by amended wording on new Revised NPF4 Policy 21(e) 'Play, recreation and sport'.	Details of planned guidance will be set out through the delivery programme.

PART 3 – National Planning Policy
Draft Policy 12: Blue and green infrastructure, play and sport

Issue	Change	Reason/Comments
12 (k) New, replacement or improved play provision		
Remove reference to replacement as it is outwith the scope of planning decisions.	No change. We do not see “replacement” as being limited to replacing play equipment only, but extends to replacement of play opportunities.	The policy highlights the link with the planning authority’s Play Sufficiency Assessment, which will be informed by engagements with children on what forms of play opportunities they would like, whether they are new, replaced or enhanced.
A few consultees highlighted that the requirements for long term maintenance and renewal of play equipment should be included.	Added new Revised NPF4 Policy 21(g) ‘Play, recreation and sport’.	To respond to stakeholder views.
12 (i) effective management and maintenance plans		
Definition of ‘maintenance’ needed and requirements set out, including responsibilities and funding.	No change.	The requirements are considerations for individual proposals.

Policy 13: Flooding and water management

Summary of representations

While most respondents agreed with the overall ambition of developing transformative approaches to future flood risk management, some were concerned about gaps that could undermine the policy aims. Other general concerns included that Policy 13 only addresses future development, whereas strategic, solution-based approaches are needed for areas already at risk of flooding.

Overview of changes

This is Revised NPF4 Policy 22 'Flood risk and water management'. This policy has been revised in response to comments received. Development is not supported in areas at risk of flooding, with some exemptions including previously developed land where regeneration priorities have been identified in LDPs. The requirement in rural areas for a connection to a water main has been reworded to avoid adversely impacting on rural areas.

Issues raised and changes made

Issue	Change	Reason/Comments
Support for the policy on surface water flooding, but clarification sought on whether it applies to all developments.	No change.	UK Climate Change Committee request. The policy applies to all development proposals.
Clarity sought on the requirements or criteria for essential infrastructure to be allowed to be built in the future flood plain.	Added definition of essential infrastructure in the Glossary.	To respond to UK Climate Change Committee views.
Clarity sought on whether NPF4's monitoring and evaluation framework will include collection of data on development in flood risk areas.	No change.	UK Climate Change Committee request. Actions for monitoring and evaluation are set out in Delivery Programme.
Cross reference to Policy 35 Coasts.	New 'Key Policy Connections' section makes reference.	To respond to stakeholder views.
Policy fit with SEPA's position statement on elevated buildings in areas of flood risk.	Revised NPF4 Policy 22 'Flood risk and water management' includes new part (a). Bullet point (iv) and further additional text on specific requirements is provided that aligns with SEPA	To respond to stakeholder views. Policy recognises that in managing climate change there may be a need to bring previously used urban land near our rivers and coasts back in to positive use and to

PART 3 – National Planning Policy
Draft Policy 13: Flooding and water management

Issue	Change	Reason/Comments
	position statement on elevated buildings.	enable existing built-up areas to adapt to increasing flood risk in line with SEPA's position statement.
Reference to climate agenda and early consideration of use of natural flood management systems in developing plans/ proposals.	Specific reference made to resilience to future flood risk and use of natural flood risk management measures in Revised NPF4 Policy 22 'Flood risk and water management' outcome. LDP policy section and part 22(e) reference support for inclusion of natural flood risk management and blue-green infrastructure in design.	To respond to stakeholder views.
Highlight the importance of flood risk management plans as part of the planning system.	Added requirement in Revised NPF4 Policy 22 'Flood risk and water management' LDP section that plans need to take into account the probability of flooding from all sources and make use of relevant flood risk and river basin management plans for the area.	To respond to stakeholder comments. Further guidance on flood risk management will be provided in LDP guidance.
Too focused on developments in urban and coastal land, with need to consider wider context to support flood risk management solutions.	Existing draft policy extended beyond scope of urban and coastal context. Amended wording and editing changes to text, which help demonstrate that the policy extends across all areas, including: <ul style="list-style-type: none"> • Revised NPF4 Policy 22 outcomes citing wider use of natural flood risk management and support for this in LDP section. • Revised NPF4 Policy 22 reference made to need for plans to take into account the probability of flooding 	To respond to stakeholder comments.

PART 3 – National Planning Policy
Draft Policy 13: Flooding and water management

Issue	Change	Reason/Comments
	from all sources and make use of relevant flood risk and river basin management plans for the area.	
13 (a) community resilience to current and future impacts of climate change		
Seeking clarity on terms used, e.g. 'development proposals' and 'community resilience'.	New LDP text in revised NPF4 Policy 22 'Flood risk and water management' to improve clarity on approach to be taken to flood risk. Development proposals' term is removed from this section. 'Community resilience' is retained and considered appropriate and well defined in context of the policy.	To provide clarity and respond to stakeholder views.
Request to include reference to climate adaptation requirements/ needs and potential need for managed retreat/ relocation of development aware from areas of significant flood risk.	New LDP text in Revised NPF4 Policy 22 'Flood risk and water management' includes reference to adaptation and makes clear areas where climate change is likely to result in increased flood exposure that becomes unmanageable, consideration should be given to alternative sustainable land use.	To respond to stakeholder views.
Clarity sought on the coverage of natural flood management and relationship to biodiversity improvement. Additional requests to including reference to relevant plans.	New LDP text in Revised NPF4 Policy 22 'Flood risk and water management' includes reference to identifying opportunities to improve the water environment and to make use of relevant flood risk and river basin management plans.	To respond to stakeholder views. Policy aligns with the Water Environment and Water Services (Scotland) Act 2003 (WEWS) that places duties on the Scottish Government, Responsible Authorities and SEPA to protect and improve the water environment.
13 (b) Future Functional Floodplain		
Clarity of terminology used and the level of protection against flood risk that the policy offers.	Part b) is now Revised NPF4 Policy 22(a) 'Flood risk and water management' with Future	To respond to stakeholder views.

PART 3 – National Planning Policy
Draft Policy 13: Flooding and water management

Issue	Change	Reason/Comments
	<p>Functional Floodplain terminology removed in favour of 'at risk of flooding or in a flood risk area' which are defined in the Glossary. Clearer wording included on the types of development proposals that can be considered, when at risk of flooding or in a flood risk area.</p> <p>Clearer wording given on what information is needed and what design requirements must be met.</p>	
13 (c) small scale extensions and alterations to existing buildings		
<p>Clarification on terminology.</p>	<p>Replaced part c) with Revised NPF4 Policy 22(b) 'Flood risk and water management' and wording more concise.</p>	<p>To respond to stakeholder views.</p>
13 (d) areas outwith functional floodplains		
<p>No definition of most vulnerable/civil infrastructure.</p>	<p>Removed part (d). Deleted due to 1:1000 year return period now being included in those areas that should be avoided due to flood risk.</p>	<p>To respond to stakeholder views.</p>
13 (e),(f),(g) risk of/avoid surface water flooding and public water mains		
<p>Need for greater clarity on requirements and the terminology used.</p>	<p>Part (e), (f) and (g) amended and replaced with Revised NPF4 Policy 22(c) and (d) 'Flood risk and water management'. Clearer wording is offered on requirements that are sought by the policy.</p>	<p>To respond to stakeholder views.</p>
13 (h) natural flood risk management and blue-green infrastructure		
<p>Links to Policy 12 and support natural flood risk and blue green infrastructure.</p>	<p>Amended part (h) (Now Revised NPF4 Policy 22(e) 'Flood risk and water management') and links to Policy 12 (Blue and Green Infrastructure) provided in new key policy connections.</p>	<p>To respond to stakeholder views.</p>

Policy 14: Health and wellbeing

Summary of representations

There was support for health and wellbeing being part of the planning process, and an appreciation that the planning system could do more to support healthier places and tackle health inequalities. Some were looking for an explicit statement that development proposals detrimental to active lifestyles and wellbeing will not be supported.

Overview of changes

This is Revised NPF4 Policy 23 'Health and safety'. This policy has been reviewed to clarify the role of the development plan and development management. Links are made to exercise and food growing. Suicide risk is a new element included in the policy. Other additional text in NPF4 sets out the cross-cutting nature of health and makes explicit links to a wide range of policies such as natural environment, housing, transport, blue and green infrastructure and play.

Issues raised and changes made

Issue	Change	Reason/Comments
Increase prominence of/ emphasis on health and wellbeing, e.g. equal with climate and nature/make into a universal policy.	Amended text - the NPF4 spatial principles highlight empowerment, sustainable transport, local living, climate change and creating opportunities. 'Lifelong Health and Wellbeing' included as a cross cutting outcome with supporting policy links. Policy outcomes added for Revised NPF4 Policy 23 'Health and Safety'.	To respond to Committee (LGHP and HSCS) and stakeholder views.
More emphasis on health/wellbeing impacts of planning policy and place design including housing (all scales), positive outcomes sought, issues include derelict land, low density housing, lack of sustainable transport options.	Amended text - Six qualities of Successful Places include 'healthy' as well as 'pleasant', 'connected', 'distinctive', and 'sustainable' which all have connections to health and wellbeing. Revised NPF4 includes policy on 'Brownfield, vacant and derelict land and empty buildings' as well as liveable places, which can influence density considerations.	To respond to Committee (LGHP and HSCS).

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
	<p>Amended wider NPF text to include 'Lifelong Health and Wellbeing' as a cross cutting outcome with supporting policy links. Revised NPF4 Policy 23(a) 'Health and safety' is new and supports proposals that will have positive health effects and Revised NPF4 Policy 23(b) has been amended from draft policy 14 'health and wellbeing' so that Health Impact Assessments are not limited to only larger scales of development.</p>	
<p>Emphasise how the approach to inequalities, health and wellbeing addresses rural and island needs.</p>	<p>Amended text – the LDP section of Revised NPF4 Policy 23 'health and safety' includes that health and social care services and infrastructure needed should be identified. This applies to all authorities. The spatial strategy has been strengthened, the Priorities for the North area include regeneration and 20 minute neighbourhoods in addition to economic diversification. For the North West it supports a positive approach to rural development that strengthens networks of communities, and in the South it supports increased population, sustainable rural development and local economic development.</p>	<p>To respond to LGHP Committee.</p>
<p>Health and wellbeing evidence based approach to decisions needed, e.g. role of health and social care partnerships, health boards and third sector; material status for health</p>	<p>Amended text - to clarify in Revised NPF4 Policy 23 'Health and safety' the role of the LDP to identify health and social care services and infrastructure needed in an area in</p>	<p>To respond to Committee (RAINE and HSCS).</p>

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
and wellbeing; how are policies prioritised.	partnership with Health Boards and Health and Social Care Partnerships. Revised NPF4 Policy 23(b) retains the potential for use of Health Impact Assessment.	
Policy should not support proposals detrimental to physical activity, health and wellbeing.	No change.	Revised NPF4 Policy 23(b) 'Health and safety' does not support proposals with a likely significant adverse effect on health. Revised NPF4 Policy 23(a) supports developments with positive effects on health and the LDP instruction is to create healthier places and references matters promoting health and wellbeing.
Health and social care assessments should be required, particularly for needs of older/Vulnerable groups.	No change.	Such assessments can form part of Health Impact Assessment.
Should reference mental health and its links to the environment and physical activity.	Amended text – mental health referenced in Revised NPF4 policies: 14(a) 'Design, Quality and Place'; and 21 'Play, Recreation and Sport'. Link between health, nature and physical activity included in the 'Cross-cutting Outcome and Policy links: Lifelong Health and Wellbeing'.	To respond to stakeholder views.
Suicide risk.	Suicide risk included in 'Cross-Cutting Outcome and Policy Links: Lifelong Health and Wellbeing'. Locations of concern for suicide referenced in Revised NPF4 Policy 23 'Health and safety' LDP section. New criterion 23(f) on suicide risk added.	Following on from the consultation on a New Suicide Prevention Strategy and Action Plan for Scotland, to reflect built environment attributes of risk of suicide.

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
Should consider health of the environment, given the role of nature in wellbeing.	Amended text - link between health and nature and managing effects of development on biodiversity and natural places included in the 'Cross-cutting Outcome and Policy links: Lifelong Health and Wellbeing'.	To respond to stakeholder views.
Should recognise health and wellbeing effects of arts and cultural engagement.	No change.	Revised NPF4 Policy 31 'Culture and Creativity' supports new provision and resists loss of provision of opportunities for arts, culture and creativity.
Omission of creation of a healthier food environment.	Amended text – Revised NPF4 Policy 28 'Retail' updated so LDPs identify areas where proposals for healthy food and drink proposals can be supported (was previously a criterion for determining applications). Policy 28(c) seeks demonstration of contribution to health and wellbeing of new small-scale neighbourhood retail. The food environment is addressed across three Revised NPF4 Policies: 23 'Health and safety'; 27 'City, town, local and commercial centres'; and 28 'Retail'.	To respond to Committee (LGHP and HSCS). Policy Revised NPF4 Policy 27(c) 'City, town, local and commercial centres' retains resistance to hot food takeaways, including permanently sited vans, where further provision undermines health and wellbeing of communities, particularly in disadvantaged areas. Support for food growing remains in Revised NPF4 Policy 23 'Health and Safety.'
Good quality, safe homes suitable for a variety of needs are important for people to remain in their community.	Text amended – link between housing and health and wellbeing included in the 'Cross-cutting Outcome and Policy links: Lifelong Health and Wellbeing'.	Revised NPF4 Policy 16 'Quality homes' supports new homes meeting diverse needs and addressing gaps in provision as well as adaptations to existing homes for particular needs.
Community is important to wellbeing, needs connected places and communities with transport	Text amended – link between accessibility, public facilities and services, and health and	To respond to stakeholder views.

Issue	Change	Reason/Comments
links and access to public services.	wellbeing included in the 'Cross-cutting Outcome and Policy links: Lifelong Health and Wellbeing'. A policy outcome supporting connectivity is added for Revised NPF4 Policy 13 'Sustainable transport'. Revised NPF4 Policy 18 'Infrastructure first' includes a key policy connection reference to 'Health and safety'.	
Health and wellbeing assessment of National Developments should have parity with the climate/nature assessments.	No change.	To respond to Committee (HSCS). The Planning (Scotland) Act 2019 includes provisions that an assessment of the likely health effects of national and major development is undertaken in relation to decision making on planning applications. National development status does not grant planning permission. However, the likely health effects of proposed National Developments have been considered as part of the SEA process.
14 (a) health inequalities		
Clarity needed on expectations, duties and responsibilities on planning authorities.	Text amended for clarity. Criterion (a) deleted and replaced with text on the role of the LDP, which includes elements from criterion (a). Development management responsibilities set out in Revised NPF4 Policy 23 'Health and safety' criterion (a)-(j).	To respond to stakeholder views.
Define health and social care infrastructure.	No change.	More information about health and social care infrastructure is anticipated to be included in the

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
		forthcoming Capital Investment Strategy.
Incorporate the Place and Wellbeing Outcomes developed by the Spatial Planning, Health and Wellbeing Collaborative Group.	No change.	Committee (HSCS) and stakeholder request. The outcomes are a helpful resource for planning authorities. Their scope includes development based attributes and procedural ones. They have been reviewed in the context of NPF4 and are considered to be addressed where relevant by NPF4 content.
More emphasis should be given to health care facilities and infrastructure.	Amended text – clarification in Revised NPF4 Policy 23 ‘Health and safety’ that LDPs are to be informed about the health and social care services and infrastructure needs in the area. Revised NPF4 Policy 23(c) supports proposals for health and social care facilities and infrastructure.	To respond to stakeholder views. Revised NPF4 Policy 18 ‘Infrastructure first’ supports development proposals that provide or contribute to infrastructure in line with that identified as necessary in the LDP.
Policy should be more than just facilities and infrastructure, e.g. should require access to natural environment and green spaces.	Revised NPF4 Policy 23 ‘Health and safety’ adds text on outcomes for health. Amended text - ‘Lifelong Health and Wellbeing’ added as a cross-cutting outcome with supporting policy links; such as blue and green infrastructure, play and sport.	To respond to stakeholder views. The policy is not intended to be the entirety of NPF4 approach to health, wellbeing and safety. These issues are addressed throughout NPF4 but some tools and particular approaches are grouped under this policy.
14 (b) significant adverse health effects		
Uncertainty if health impact is an issue for planning.	No change.	Health outcomes have long been a matter for the planning system, as part of movement towards sustainable development. The Planning (Scotland) Act requires an assessment of health effects for major and National Developments.

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
Define/further details on 'significant adverse health effects' sought.	No change.	'Significant adverse health effects' are not defined as the parameters of what is significant will vary between developments and locational context.
Call for clarity of trigger for requirement for HIA.	Text amended to simplify the approach, case by case judgement needed for application of HIA.	To respond to stakeholder views.
Health Inequalities Impact Assessment (HIIA) should be a requirement for development proposals/NPF4.	No change.	HSCS Committee request. The HSCS Committee recommendations for NPF4 in its 'Tackling Health Inequalities in Scotland' report, which reinforce recommendations made by the committee on the Draft NPF4 have been noted. The wording of NPF4 does not prevent planning authorities from choosing to undertake HIIA for development planning purposes. Health effects are included in Strategic Environmental Assessment (SEA) undertaken for LDPs. Legislation already requires that LDPs include a spatial strategy that takes account of a range of prescribed matters including the health of the population of the district. HIIA would likely be less appropriate for individual applications and NPF4 refers to Health Impact Assessment for those.
Places/housing should be connected and with access to services for wellbeing and health.	Amended text - clarification that LDPs are to identify the health and social care services and infrastructure needs in the area, including potential for co-location of complementary	To respond to Committee and stakeholder views. Health Boards are key agencies for the preparation of LDPs and therefore expected to

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
	services, in partnership with Health Boards and Health and Social Care Partnerships.	participate in their preparation.
Health and wellbeing evidence based approach to decisions needed, e.g. material status for health and wellbeing; guidance requested.	Amended text to clarify role of LDP and decisions on planning applications including use of health impact assessment and engagement of Health Boards and Health and Social Care Partnerships in LDPs. Inclusion in NPF4 enables the matter to be addressed in plans and decisions as a material consideration.	To respond to Committee (HSCS and RAINE).
14 (c) air quality		
Define 'significant adverse effect on air quality'.	No change.	'Significant adverse effect on air quality' not defined as this would be informed by an air quality assessment, now provided for by the policy.
Detail sought on implementation of approach to air quality.	Amended text – policy purpose clarified and trigger for air quality assessment included.	To respond to stakeholder views.
Air quality assessment should be required.	Amended text - includes trigger for air quality assessment.	To respond to stakeholder views.
Detail sought on method/scope of air quality assessment.	No change.	Out of scope of NPF4.
Policy is inconsistent with Cleaner Air for Scotland 2.	Amended text – to further align with CAFS2.	To respond to stakeholder views.
Some operations have adverse air quality impacts including mineral extraction, incineration, biomass power, domestic cooking/ heating systems.	No change.	This policy applies to any development that triggers it. Air pollution is also addressed in Revised NPF4 policies: <ul style="list-style-type: none"> • 33(d)(iv) Minerals; and • 12(ii) Zero Waste.
14 (d) unacceptable levels of noise		
Detail sought on approach to implementation of policy on noise, should align with	Amended text - to align with PAN 1/2011 which	To respond to stakeholder views.

PART 3 – National Planning Policy
Draft Policy 14: Health and wellbeing

Issue	Change	Reason/Comments
Planning Advice Note (PAN) 1/2011.	sets out guidance on noise and the planning system.	
Define 'unacceptable levels of noise'.	No change.	'Unacceptable levels of noise' would be informed by a noise impact assessment, provided for by the policy.
Refer to Agent of Change principle for those developments in areas where noise impacts can't be fully mitigated.	Amended text - includes the Agent of Change principle.	To respond to stakeholder views.
Refer to ETSU – R – 97 for wind farms and noise assessment.	No change.	ETSU – R – 97 refers to 'The Assessment & Rating of Noise from Wind Farms' report an methodology. It is a commonly applied methodology for wind farm noise impact assessment.
Other amenity issues could be included e.g.: odour; vibration; light pollution.	No change.	LDPs may include other amenity matters as considered relevant to the area.
14 (e) local community food growing and allotments		
Food should be more prominent/ stand-alone policy.	Policy criterion deleted, food growing and allotments included in Revised NPF4 new policy 23(a). Food growing and allotments included in LDP section.	To respond to stakeholder views.
Community food growing should be required of certain developments/set triggers.	LDP section clarified to include community food growing.	Ensuring there is support for community food growing in the LDP spatial strategy helps provide strategic direction for the opportunities rather than this only being dealt with case by case through planning applications.
Policy is a loophole allowing for inappropriately sited development.	No change.	NPF4 should be read as a whole in reaching decisions on planning applications and relevant policy applied.

Policy 15: Safety

Summary of representations

Comments noted that the policy is not a general policy on safety but relates to specific land uses and hazards. A number of specific comments were made about development proposals in the vicinity of major accident hazard sites. Definition of terms was sought, major accident pipelines were highlighted for inclusion as well as a variety of factors to be addressed in decision making.

Overview of changes

This is Revised NPF4 Policy 23 'Health and safety'. This is now a combined policy that covers both Health and Safety (which in the Draft was split over draft policies 14 and 15). The combined policy helps to protect health and wellbeing, including by ensuring that air and noise pollution are taken into account, and by planning and managing development to take into account hazards. It aims to protect people and places from environmental harm, mitigate risks arising from safety hazards and encourage, promote and facilitate development that improves health and wellbeing.

Issues raised and changes made

Issue	Change	Reason/Comments
Request for more explicit references to safety needs of children, women, older people, disabled people.	Text amended – enhanced text on women’s safety included in: the revised NPF4 new ‘Cross-Cutting Outcome and Policy Links: Policy 14(b) Design, Quality and Place; Lifelong Health and Wellbeing’ section; and Annex D ‘The Six Qualities of Successful Places’. Incorporation of safety measures and user safety is included in Revised NPF4 Policy 13(b) ‘Sustainable Transport’. New Revised NPF4 text ‘Cross-Cutting Policy: A Fair and Inclusive Planning System’ highlights the contribution of children and young people, women, disabled people and their representatives in terms of design barriers and challenges.	To respond to Committee (LGHP).

Issue	Change	Reason/Comments
Development proposals in the vicinity of major-accident hazard sites		
Include major accident hazard pipeline.	Amended text refers to development proposals within the vicinity of a major accident hazard site or major hazard pipeline.	To respond to stakeholder views.
Clarity on wording in relation to the decision maker receiving advice from statutory consultees.	Amended text refers to advice from statutory consultees.	To respond to stakeholder views.

Policy 16: Land and premises for business and employment

Summary of representations

There were mixed views on the policy. While there was general support for its ambitions, including the linking of investment with the transition to net zero and supporting a nature positive approach, there were concerns that the policy, as it currently stands, will not achieve its aims. There were calls for guidance on how critical aspects of the policy, such as net economic benefit, could be demonstrated and assessed.

Overview of changes

This is Revised NPF4 Policy 26 'Business and industry'. This policy has been restructured to provide clarity and avoid duplication, and wording revised to address definitions, terminology and ensure consistency with other policies.

Issues raised and changes made

Issue	Change	Reason/Comments
Clarify overall purpose and strengthen deliverability of policy.	Changed title and refocused policy on business and industry. The policy intent contributes to wider goals such as the wellbeing economy and community wealth building.	To respond to stakeholder views.
To clarify terminology, including "wellbeing economy", "net economic benefit", "green jobs" and "community wealth building initiatives".	Definitions of some key terms provided in the Glossary. Not all requested definitions are given as they are intended as broad descriptions rather than specific terms.	To respond to stakeholder views and provide clarity where feasible.
To enable localised approaches to policy implementation, particularly noting the omission of reference to business land audits in comparison to SPP (2014), and circumstances of rural and island communities.	Inserted reference to business and industry land audits under LDP section, which also includes reference to local economic strategies. Inserted key policy connection to Rural development policy.	To respond to stakeholder views.
To reference the role of business in enabling a circular economy, in terms of building reuse, and the	The policy intent contributes to wider goals, such as the wellbeing economy and community wealth building.	NPF4 should be read as a whole; some of these issues are addressed in other policies.

PART 3 – National Planning Policy
Draft Policy 16: Land and premises for business and employment

Issue	Change	Reason/Comments
provision of relevant services.		
To make a link between this policy and digital infrastructure and connectivity, in general and specifically in relation to c).	Key policy connections inserted, including to Digital infrastructure.	To clarify links between NPF4 policies, and to respond to stakeholder views. NPF4 should be read as a whole.
To include a reference to mixed use sites.	No change.	Site allocations and the consideration of complementary uses within mixed use sites are a matter for LDPs. NPF4 should be read as a whole.
Request to consider impacts on historic environment and ensure consistency across NPF4.	No change.	Impact on the historic environment included in policy 16 (g) carried through to Revised NPF4 Policy 26(e)(i). NPF4 should be read as a whole.
Request for reference to National Strategy for Economic Transformation (NSET).	No change.	Cross referencing of other relevant national strategies is included in the NPF4 Delivery Programme.
Not a clear enough link with the National Developments.	Added Table 1, a new schematic diagram showing connections between NDs, policies and themes.	To respond to stakeholder views.
No explicit requirement for business and employment proposals to be climate resilient, including with respect to energy supply.	Key policy connections inserted.	To improve clarity and respond to stakeholder views.
To reference complexity of sustainability of location decisions, in particular that brownfield sites are not assumed to be the preferred option for development.	Clarification of wording of policy regarding impact on the natural environment.	To respond to stakeholder views. NPF4 should be read as a whole, including policy on brownfield land.
16 (a) LDPs should set out proposals to meet requirements for employment land, infrastructure and investment which supports a greener, fairer and more inclusive wellbeing economy		
To request a consistent methodology for	No change.	Outwith scope of NPF4.

PART 3 – National Planning Policy
Draft Policy 16: Land and premises for business and employment

Issue	Change	Reason/Comments
determining employment land needs and demands.		
To reference specific needs of certain industry sectors.	No change.	Outwith scope of policy. NPF4 should be read as a whole, reference to specific land and building uses, e.g. creative activities, is made under relevant policies.
16 (b) business and employment uses in sites allocated for those uses in the LDP		
To clarify the use of 'net economic benefit'.	Removed references to "net economic benefit" from the policy.	To provide clarity and respond to stakeholder views. Outwith scope of NPF4 to provide guidance on net economic benefit.
To clarify policies regarding allocated business and employment sites.	Amended wording of policy to business and industry.	To provide clarity and respond to stakeholder views.
Clarification sought of what is considered an 'employment use', within the NPF4 Glossary or guidance.	'Other employment uses' is clear as being other than 'business and industry'.	Clarification not required due to amended text referring to other employment uses apart from business and industry.
16 (c) Home working, live-work units and micro-businesses		
To define 'home working' for planning purposes	No change.	No universally agreed definition of 'home working'.
To reference 'community and social businesses' and crofting in particular.	No change.	Community wealth building and rural development policies reference these issues. NPF4 should be read as a whole.
Concerns expressed about amenity and environmental impact of expanding businesses.	No change.	Policy requires amenity of neighbouring uses and impact on the natural environment to be taken into account.
16 (d) business, general industrial and storage and distribution uses		
To expand policy coverage to include energy or data storage facilities.	No change.	General industrial use allows for broad definition.
16 (e) conditions for site restoration		
Strengthen policy regarding conditions for	Amended text in Revised NPF4 Policy 26(e)(ii).	To respond to stakeholder views. NPF4 should be

PART 3 – National Planning Policy
Draft Policy 16: Land and premises for business and employment

Issue	Change	Reason/Comments
site restoration, including request to require financial guarantees.		read as a whole, including the relevant tests for planning obligations.
16 (f) business, general industrial and storage and distribution uses outwith areas identified for those uses		
Strengthen the plan-led approach of NPF4 as a whole. Reference to rural areas in particular.	Amended to include key policy connections.	To respond to stakeholder views. NPF4 should be read as a whole, to avoid unnecessary duplication.
Include reference to the sustainability of the location in terms of the acceptability of the site.	Amended to include key policy connections.	NPF4 should be read as a whole, to avoid unnecessary duplication.
To clarify use of 'unacceptable impacts'.	Amended text.	To clarify and respond to stakeholder views.
16 (g) other issues for development proposals to take into account		
This part of the policy duplicates other parts, while also being incomplete.	Amended policy structure and text to remove duplications and clarify policy intent.	To clarify and respond to stakeholder views.

Policy 17: Sustainable tourism

Summary of representations

Whilst most respondents recognised the importance of sustainable tourism and supported the key principles set out, there were mixed views about the proposal that LDPs should be used to support the tourism sector and identify proposals for tourism development.

Overview of changes

This is Revised NPF4 Policy 30 'Tourism'. This policy has been rationalised and revised to ensure clear terminology and definitions.

Issues raised and changes made

Issue	Change	Reason/Comments
Definitions sought for a range of terms, including 'sustainable tourism', 'support' and 'resilience'.	Added definition of 'sustainable tourism' to Glossary. Policy title changed to 'tourism'.	To respond to stakeholder views.
Clarity sought on role of planning policy with regards to 'inspiring tourists to visit Scotland'.	Amended structure and wording of policy to clarify policy intent.	To clarify and respond to stakeholder views.
17 (a) LDPs and tourism		
Appropriateness of identifying sites for tourism development in the LDP.	No change.	Consistent with plan-led approach to development.
Concerns that the policy does not account for the role of planning in alleviating adverse impacts of tourism.	New LDP section includes reference adverse impacts and where further development is not appropriate.	To respond to stakeholder views.
Mention 'sector driven tourism strategies'.	No change.	National and local strategies evolve over time, current wording gives flexibility to reflect local contexts.
17 (b) proposals for new or extended tourism facilities		
Consider impacts on the historic environment, also at (c).	Added in key policy connections.	NPF4 is to be read as a whole, avoiding unnecessary duplication.
Consider impacts on the natural environment, also at (c).	Added in key policy connections.	NPF4 is to be read as a whole, avoiding unnecessary duplication.

Issue	Change	Reason/Comments
Include definitions of 'viability, sustainability and diversity of the local economy', along with methodology for demonstrating compliance of proposals.	Amended structure and wording of policy.	To improve clarity and respond to stakeholder views.
Suggestion that to deliver the policy, planning authorities would be required to identify whether their areas can support further tourism development or whether tourism is having adverse effects.	Amended structure and wording of policy.	To improve clarity and respond to stakeholder views.
Include mention of sustainable access to facilities.	Addition of key policy connections lists Sustainable transport policy and Revised NPF4 Policy 30(b)(iv) references sustainable transport.	To respond to stakeholder views.
17 (c) impacts on the environment / quality of life / health and wellbeing of local communities		
Include methodology for assessing relevant impact of proposals.	Amended structure and wording of policy, in particular Revised NPF4 Policy 30(b).	To improve clarity and respond to stakeholder views.
Clarify how infrastructure capacity will be considered, and the scope for developer contributions to mitigate the adverse impacts of tourism development.	No change.	NPF4 should be read as a whole, to avoid unnecessary duplication. Relevant tests for developer contributions are included in policy on Infrastructure First.
17 (d) proposals for huts		
Concerns about the potential impact of huts on the natural environment and local amenities.	No change.	Policy requires proposals to be compatible in nature and scale with the surrounding area, and makes reference to relevant good practice guidance, providing scope for planning authorities to manage the impact of huts at the local level.
17 (e) short term holiday lets		

PART 3 – National Planning Policy
Draft Policy 17: Sustainable tourism

Issue	Change	Reason/Comments
Mixed views on short term lets. Some requests for further guidance to minimise adverse impacts, while others sought less regulation.	No change.	Policy wording provides adequate scope for planning authorities to consider acceptability of proposals at local level.
17 (f) change of use of a tourism-related facility		
Request to define 'tourism-related facility'.	Deleted term.	To respond to stakeholder views and improve clarity.
17 (g) development proposals for tourist facilities, matters to take into account		
Requests to define methodology for assessing impacts of proposals	No change.	Outwith scope of NPF4 to provide detailed methodology. Policy wording provides adequate scope for planning authorities to consider acceptability of proposals at local level.
Consider other impacts, including on the natural and historic environment, and sustainable transport access.	Added key policy connections.	NPF4 should be read as a whole, to avoid unnecessary duplication.

Policy 18: Culture and creativity

Summary of representations

Many respondents welcomed the inclusion of a specific policy covering culture and creativity, including the recognition this gives to our important and diverse creative and cultural sector. However, some were concerned that the policy silos culture, and does not embrace the ways in which cultural activities can support the delivery of other NPF4 policies.

Overview of changes

This is Revised NPF4 Policy 31 'Culture and creativity'. This policy has had minor revisions to make wording clear and consistent.

Issues raised and changes made

Issue	Change	Reason/Comments
Concern that policy silos culture and does not embrace ways in which it can support the delivery of other policies.	Added new 'Key policy Connections' section which emphasises the links across policy areas.	To respond to stakeholder views. NPF4 is to be read as a whole, avoiding unnecessary repetition.
Criteria to be used when considering applications for new arts or cultural proposals.	No change.	Allows local flexibility around needs and priorities.
Local Place Plans could play a role, including: how children and young people can be involved; the role of museums; gardens, parks and other spaces; grassroots music venues.	No change.	The LDP guidance will cover considerations for LDPs. More appropriate to cover in guidance to allow local flexibility around needs and priorities.
18 (a) LDPs recognise and support opportunities for jobs and investment		
Further information on how LDPs should recognise and support jobs and investment, including in the creative sector.	No change.	The LDP guidance will cover considerations for LDPs. More appropriate to cover in guidance to allow local flexibility around needs and priorities.
18 (b) provision for public art		
Lack of definition of public art and open spaces and tests in relation to conditions and planning obligations.	No change.	No definition of 'public art' has been included to allow local flexibility, and 'public art' that fits the local place and context. There is existing guidance on

Issue	Change	Reason/Comments
		conditions and planning obligations.
Query on limitation of public art provision to public open spaces.	No change.	LDPs have local flexibility around needs and priorities.
Define open spaces, scale and type.	Amendment. Key policy connections refers to policy on open space.	NPF4 should be read as a whole, avoiding unnecessary duplication.
Heritage, history and interpretation should be included in definition of public art.	Amendment. Key policy connections refers to policy on historic environment assets and places.	NPF4 should be read as a whole, avoiding unnecessary duplication.
18 (c) creative workspaces or other cultural uses		
Should balance proposals against any negative impacts, e.g. amenity, transport.	No change.	NPF4 is to be read as a whole, avoiding unnecessary duplication.
Locational test for site allocation.	No change.	NPF4 is to be read as a whole. To allow local flexibility around needs and priorities.
Query focus on temporary use, longer-term opportunities would benefit tenants and owners.	Amendment. Key policy connections refers to policy on vacant land and property.	NPF4 should be read as a whole, avoiding unnecessary duplication.
18 (d) loss of an arts or cultural venue		
Should apply to spaces used by community arts groups, including public halls.	No change.	Existing wording does not exclude these spaces.
Agent of Change (AoC) principle should be cross-referenced to Policy 14 (Health and Wellbeing).	New 'Key policy connections' includes reference to 'Health and safety'.	NPF4 should be read as a whole.
AoC principle definition should be amended to reflect the 1997 Act.	No change to the policy. Minor correction made to the Glossary definition.	The wording reflects how the provisions of the Act are applied.
Protection should extend to spaces used by community arts groups, such as village halls, scout huts and libraries.	No change.	Existing wording does not exclude these spaces.

Policy 19: Green energy

Summary of representations

Respondents were relatively evenly divided between those who thought the policy will meet the stated objectives and those who thought it would not. It was argued that it lacks detail on how the planning system should support renewable energy development or the implications of such an approach where a range of planning considerations need to be balanced.

Some respondents considered that, in the absence of a development management test that recognises the status of the climate emergency and the national importance of renewable energy developments, much of the approach will be 'business as usual', while others argued that Policy 19 could potentially represent a backward step.

Overview of changes

This is Revised NPF4 Policy 11 'Energy'. This policy has been substantially revised to make it clear that all types of renewable energy are supported, other than wind farms in National Parks and National Scenic Areas. The criteria for assessing proposals have been updated including stronger weight being afforded to the contribution of the development to the climate emergency, as well as community benefit.

Natural Places policy on wild land has also been revised in tandem to expressly support development that assists in meeting renewable energy targets, subject to an impact assessment, and appropriate mitigation, management measures and monitoring. These changes have been made given the scale of development required to reach net zero.

Issues raised and changes made

Issue	Change	Reason/Comments
Title of policy.	Changed from 'Green Energy' to 'Energy'.	To respond to stakeholder views and reflect that the policy covers many types of energy generation including renewables, low-carbon and net zero technologies.
Make clearer what is expected of local authorities when considering applications for renewables.	Clearer policy in Revised NPF4 Policy 11 'Energy' parts (b) to (f) with updated criteria for consideration in part (e). This replaces list in Draft NPF4 Policy 19 part (k). Amended policy wording as detailed below.	To respond to Committee views (LGHP) and provide clarity of message.

Issue	Change	Reason/Comments
Policy to reflect that technology is changing.	Wording amended from draft, with reference made to ‘emerging low-carbon and zero emissions technologies’ in policy intent section. Additionally, ‘all forms of renewable, low-carbon and zero emission technologies’ are supported in policy part a).	To respond to Committee views (LGHP).
All applications for energy generation should require a decarbonisation strategy, not just those from low-carbon sources. Also, that climate resilience should be mentioned in this context.	Removed requirement for decarbonisation strategy from energy policy. The requirement remains to be applied to all major applications for manufacturing or industry and has been moved to Business and Industry policy 26. New Policy 2 provides mechanism for addressing climate resilience of development proposals.	To respond to UK Climate Change Committee. New Policy 2 applies to both Policy 11 and 26 Business and Industry and includes both a need for development proposals to be sited and designed to adapt to current and future risks from climate change AND to be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
Issue of grid capacity impacting on planning process.	Change, with inclusion of text in new part e), which states that grid capacity should not constrain renewable energy development.	To respond to NZET committee.
Clarity on whether transmission and distribution infrastructure are to be considered/ supported in this policy.	Whilst included in original draft, express reference to transmission and distribution infrastructure now included and supported within policy wording at Revised NPF4 Policy 11 ‘Energy’ Part (a) bullet (ii).	To respond to stakeholder views.
Need for better clarity of definitions used in the policy.	Updated terminology, including the list of technology that is to be supported in policy, including: ‘ <i>renewable, low-carbon and zero emission technologies</i> ’ Removed the term ‘unacceptable.’	To respond to stakeholder views and to better align terminology with that used across wider Scottish Government plans and strategies .

Issue	Change	Reason/Comments
Policy balance between support for renewable, low carbon and zero emission technology and wider NPF4 policy objectives.	Amended draft policy with Revised NPF4 Policy 11 'Energy' parts (b) to (e) which provide a rationalised suite of policy and list of considerations for assessing development proposals.	To respond to Committee (LGHP) and stakeholder views.
The extent to which Policy 19 offers support for renewable energy development in context of the global climate emergency.	On determining proposals, Revised NPF4 Policy 11 'Energy' sets out that the scale of contribution to renewable energy generation targets and effect on greenhouse gas emissions reduction targets will carry significant weight in determining whether any adverse impacts clearly outweigh the benefit of development.	To respond to Committee (LGHP) and stakeholder views.
19 (a) area's potential for electricity and heat from renewable sources		
Clarity sought on how LDPs practically support energy development. With queries regarding the spatial framework and importance of considering environmental impacts including biodiversity, nature and landscape sensitivities.	Amended wording to improve clarity, citing the need to identify a range of opportunities for energy development. Extensive amendments to rest of policy 19 to create Revised NPF4 Policy 11 'Energy', as outlined in this table. Relevant NPF4 policies listed in the key policies connections. All relevant policies provide clarity on the key considerations to be made in identifying potentially suitable sites for the full range of renewable, low-carbon and zero emission technologies.	NPF4 is to be read as a whole, with all relevant policies offering the clarity required to help identify a range of opportunities for energy development within LDP areas.
19 (b) all forms of renewable energy and low-carbon fuels		
Is overly permissive and requiring more meaningful caveats.	No change.	Revised policy provides a rationalised suite of policy and list of considerations for assessing development proposals.

Issue	Change	Reason/Comments
		Other respondents were supportive of the proposed approach.
Requests for clarity on terms used or types of energy generation referred to.	New amended text in Revised NPF4 Policy 11 'Energy' part (a) replaces energy generation technologies referred to in original draft parts (e), (f), (i), and (j).	To respond to stakeholder views. Consolidation of development forms and new wording provides greater clarity on the types of energy generation offered policy support.
19 (c) Development proposals for wind farms in National Parks and National Scenic Areas should not be supported		
Policy should not be seen as an automatic acceptance of windfarms in other areas.	No change other than policy moved to Revised NPF4 Policy 11(b) 'Energy'.	NPF4 is to be read as a whole. For onshore wind, outside of National Parks and National Scenic Areas, the remainder of the area is potentially suitable for appropriately located wind energy development guided by the considerations as set out in this and all relevant NPF4 policy, including in relation to the sensitivity of other national and international designated sites.
19 (d) outwith National Parks and National Scenic Areas		
Definition required of 'unacceptable impacts' and issue of the degree of policy support offered to appropriate energy generation proposals vs the degree of protection to other areas or designations.	Deleted part (d). Revised NPF4 Policy 11 'Energy' new parts (b) to (f) are now in place, providing a rationalised suite of policy and list of considerations for assessing development proposals.	To respond to stakeholder views. Policy support for renewable, low-carbon and zero emissions technologies is clearer, with improvements in clarity given to the main considerations to be taken in decision-making.
19 (e) repower, extend and expand existing wind farms		
As above reference to use of term 'unacceptable impacts'.	Deleted part (e). Revised NPF4 Policy 11 'Energy' new part (a) sets out support for development proposals for repowering, extending and	To respond to stakeholder/consultee views.

Issue	Change	Reason/Comments
	<p>expanding existing wind farms.</p> <p>Revised NPF4 policy 11 'Energy' new parts (b) to (e) are now in place, providing a rationalised suite of policy and list of considerations for assessing development proposals.</p>	
19 (f) small scale renewable energy generation technology		
<p>To be removed as duplicated, but also issues around need to consider proposals for their potential significant impacts.</p>	<p>Deleted (f).</p> <p>Revised NPF4 Policy 11 'Energy' new part (a) sets out support for small scale renewable generation technology.</p> <p>Revised NPF4 Policy 11 'Energy' new parts (b) to (f) are now in place, providing a rationalised suite of policy and list of considerations for assessing development proposals.</p>	<p>To respond to stakeholder views.</p>
19 (g) areas identified for wind farms		
<p>Need for clarity on terminology and implementation of policy.</p>	<p>Deleted (g) - it is replaced with Revised NPF4 Policy 11 'Energy' new part (f). Impacts on communities and individual dwellings as a consideration under Revised NPF4 Policy 11 'Energy' new part (e).</p>	<p>To respond to stakeholder views.</p>
19 (h) decarbonisation strategy		
<p>Clarity sought on which applications require decarbonisation strategies.</p>	<p>Removed requirement for decarbonisation strategy from energy policy and moved to Revised NPF4 Policy 26(f) 'Business and Industry', to cover all major applications for manufacturing or industry.</p>	<p>To respond to stakeholder views.</p>
19 (i) negative emissions technologies and carbon capture		
<p>Concerns with costs, technological readiness, implementation and residual emissions related to novel technologies</p>	<p>Part (i) has been removed, with negative emission technologies and carbon capture included in</p>	<p>Development proposals for novel technologies associated with energy generation will be required to comply with all NPF4</p>

Issue	Change	Reason/Comments
associated with energy generation.	Revised NPF4 Policy 11 'Energy' new part (a).	policies, including the energy, climate and nature crisis and climate mitigation and adaptation policies. NPF4 supports achievement of the statutory climate emissions reduction targets.
19 (j) solar arrays		
Reference to technology in policy.	Deleted part (j). Solar arrays are now referenced in Revised NPF4 Policy 11 'Energy' new part (a).	To respond to stakeholder views.
Issue of balance of policy support for solar technology and clarity sought on the list of considerations that are included.	Solar arrays are now referenced in new part (a). Revised NPF4 Policy 11 'Energy' provides a rationalised suite of policy and list of considerations for assessing development proposals.	To respond to stakeholder views.
19 (k) considerations for renewable energy developments		
Greater clarity sought on list of considerations for decision-making. Including balance of these considerations in context of range of objectives and targets.	Deleted part (k). Revised NPF4 Policy 11 'Energy' includes new rationalised suite of policy and list of considerations for assessing development proposals at parts (b) to (f).	To respond to stakeholder views and aid the flow of the document. Changes mean policy support for renewable, low-carbon and zero emissions technologies is clearer, with improvements in clarity also given to the main considerations to be taken in decision-making.

Policy 20: Zero waste

Summary of representations

In terms of an overall balance of opinion, respondents tended to support the policy. However, there were calls for a stronger focus on developing a circular economy. Reuse of existing buildings was highlighted as an important element of the circular economy that currently has limited coverage. Suggestions included that it might be preferable to draft a circular economy policy, with zero waste as a component part, or that a standalone circular economy policy would allow many other aspects to be explored more fully.

Overview of changes

This is Revised NPF4 Policy 12 ‘Zero waste’. This policy has been updated in line with the independent report on the incineration review, to make it clear that we do not support incineration other than in exceptional circumstances. The wider policy has also been rationalised to support its application by planning authorities.

Issues raised and changes made

Issue	Change	Reason/Comments
Support for content on resource efficiency and embodied emissions. Call for more detail if possible.	Amended wording to improve clarity and make it easier for the reader to understand.	To respond to the UK Climate Change Committee and stakeholder views. Guidance around embodied emissions would not be for NPF4 but could be considered as practice develops.
Calls for stronger support for developing a circular economy	Amended wording to improve clarity and make it easier for the reader to understand.	The principles of a circular economy are both evident and supported within the policy.
20 (a) LDPs should identify appropriate locations for new infrastructure to support the circular economy		
(a) should be reworded or combined with 20(f).	Amended wording to improve clarity and make it easier for the reader to understand.	Draft NPF4 policy (a) applies to LDPs, whereas policy (f) concerned development proposals.
20 (b) aim to reduce, reuse, or recycle materials in line with the waste hierarchy		
Call for more detail as to how the principles around the waste hierarchy and circularity will be applied in practice, e.g. demonstrating consistency with the waste hierarchy	No change.	UK Climate Change Committee Request. Guidance around how this would work in practice would not be for the NPF4, itself but could be

Issue	Change	Reason/Comments
and how circular economy principles will be considered as part of design and construction.		considered as practice develops.
Circular economy principles should be applied more widely, rather than being restricted to national and major developments. Concerns raised that the policy could encourage applicants to submit multiple local scale developments instead of a single major planning application.	Amended wording in Revised NPF4 Policy 12(a)(b) 'Zero waste'.	To respond to stakeholder views. It is important that the Circular Economy principles are applied widely, not just to national and major developments.
20 (c) take into account circular economy principles		
Concern that demolition can take place prior to application and about enforcing the reuse of materials.	No change.	It is important that the Circular Economy principles are applied widely.
20 (d) development proposals that are likely to generate waste		
Call to widen the type of waste related topics covered e.g. food and agricultural waste.	No change.	It was considered that the topics covered by NPF4 were comprehensive and reflected planning and waste specifically arising from development at this strategic level.
Call for improved clarity; consideration of terminology and further guidance.	Amended drafting to aid understanding. Wording has been altered and restructured to ensure it is easier to follow and therefore better understood.	To respond to stakeholder views and provide clarity of message. Some terminology has been retained, for example 'maximise' and 'minimise' within development proposals that are likely to generate waste, as these terms are readily understood within a planning context.
20 (e) Development proposals for waste infrastructure and facilities		
Importance of adopting an infrastructure first approach	No change	This is already evident within the requirements around the preparation of LDPs, in ensuring needs are identified. Addressed

Issue	Change	Reason/Comments
		by the Infrastructure First Policy.
What is an 'acceptable' or 'adequate' buffer zone.	No change	These will be matters for planning authorities to consider taking into account the specific circumstances of individual proposals.
20 (f) Development proposals for new waste infrastructure		
Criteria set out at (e) should also apply at (f); policies (e) and (f) should be combined.	Wording in Revised NPF4 Policy 12 'Zero waste' has been simplified and restructured to ensure it is easier to follow and the policy intention is better understood.	To respond to comments received.
20 (g) Development proposals for new or extended landfill sites		
Alignment with Scottish Government waste targets for 2025 and with the goal to stop landfill by 2030; requirement to comply with other relevant policy including on biodiversity.	Policy connections added.	The policy has been already aligned with the Scottish Government objectives on waste management. NPF4 should be read as a whole.
2 (h) Proposals for the capture, distribution or use of gases captured from landfill sites or waste water treatment plant should be supported		
Capture of gas from landfill should be mandatory, not just supported.	Revised NPF4 policy 12(f) 'Zero waste' now makes clear such proposals will be supported.	To respond to comments received.
20 (i) recovery of energy from waste		
View that incineration of municipal waste is not acceptable.	This policy has been amended to establish the principle of no support for development proposals for energy-from-waste, except in exceptional circumstances. The policy criterion have also been rationalised and better aligned with our response to the independent review of the role of incineration in the waste hierarchy in Scotland.	To respond to stakeholder views and the Independent review of Incineration.
Some considered it was unclear what would be required by demonstrable	Policy section removed.	To respond to stakeholder views.

Issue	Change	Reason/Comments
community benefits if treating waste from an area wider than the local authority and why it would only apply to Energy from Waste.		

Policy 21: Aquaculture

Summary of representations

Most of those commenting supported the focus on the sustainability of aquaculture, including minimising environmental impacts. Some suggested that the policy is too focused on supporting investment and does not give sufficient priority to the environment. Others suggested that the policy could be more supportive of growth in the aquaculture industry and wanted to see new aquaculture activities supported by the planning system.

Overview of changes

This is Revised NPF4 Policy 32 'Aquaculture'. This policy has been updated for clarity and improved definition of a number of terms. Many of the matters raised relate more to guidance than the policy itself. Wording regarding exclusion of open water aquaculture development from Biodiversity Policy 3(b) and 3(c) moved from Biodiversity policy to Aquaculture policy.

Issues raised and changes made

Issue	Change	Reason/Comments
Mixed views on the level of support the policy gives to supporting investment and growth in the aquaculture industry. Some suggested the policy could be more supportive whilst others felt it did not give sufficient priority to the environment.	Amended wording including new wording setting out policy intent. Amended text on LDPs to reflect feedback.	Competing views from consultees. Our Vision for Sustainable Aquaculture will set out our long term aspirations for Scottish aquaculture.
Widening the scope of the policy was suggested, to include a range of aquaculture activity such as seaweed farming, multi-trophic aquaculture, microalgae culture and recirculating aquaculture systems.	No change.	The scope of the policy is in line with the Town and Country Planning Act, which regulates land, freshwater and marine based shellfish and finfish farms. It does not extend to other types of aquaculture.
Suggestion that NPF4 should take account of the review of aquaculture regulation and the Scottish Vision for Aquaculture currently in development. Concerns were also raised regarding the complexity of spatial planning for	No change.	The regulatory review on aquaculture is ongoing, through the review we will work to improve aquaculture consenting processes and to ensure local authorities are supported in guiding

Issue	Change	Reason/Comments
aquaculture development; views that it is not feasible for LDPs to direct development as suggested; views on the need for more technical expertise (within planning authorities); and requests for further guidance.		aquaculture development to the right places. LDPs should guide development as appropriate for the local area.
21 (a) LDPS should reflect industry needs and take account of environment impact, including cumulative impact		
Reference should be made to the role of National and Regional Marine Plans in informing LDPs.	Wording included in Revised NPF4 Policy 32 'Aquaculture' LDP text to reference wider marine planning. Revised NPF4 Policy 32(b) 'Aquaculture' specifically references compliance with LDPs, National Marine Plans and Regional Marine plans.	To respond to Committee (RAINE) and provide clarity of message.
Need to highlight linkages between policy 21 and policy 35 (Coasts).	Added 'Key policy connections'.	To respond to stakeholder views.
21 (b) safeguard migratory fish species		
Calls for (b) to be expanded to protect migratory fish species in other parts of Scotland – primarily the west coast.	No change.	It is important for NPF4 to work at a national level whilst also providing flexibility to take account of local circumstances.
21 (c) compliance with the LDP, National and Regional Marine Plans		
Policy too focused on industry growth, rather than ensuring environmental sustainability.	Amended wording including new wording setting out policy intent. Amended text on LDPs to reflect feedback.	Competing views from consultees.
21 (d) development proposals for fish farm developments		
Policy criteria should be more explicit/less open to interpretation and should focus on considerations not covered by other regulatory regimes. A range of specific suggestions were also made.	Amended text to improve clarity. Where relevant and applicable suggested additional criteria have been incorporated.	To respond to stakeholder views.

Policy 22: Minerals

Summary of representations

Reasons given for supporting the policy included the need to ensure an ongoing supply of minerals and that, without a steady and adequate supply, the delivery of housing, infrastructure, other developments and manufacturing cannot be assumed. Others had broad concerns, including that there does not appear to be an assessment of the level of need for the products extracted. There was a call for more emphasis on minimising the use of new minerals in line with the principles of a circular economy.

Overview of changes

This is Revised NPF4 Policy 33 'Minerals'. This policy has been clarified to explain what is meant by the 10 year land bank. Wording has also been amended to improve clarity, including in relation to mineral extraction generally. The policy on borrow pits has been amended to reflect their temporary nature.

Issues raised and changes made

Issue	Change	Reason/Comments
22 (a) LDPs should support the 10-year landbank		
Clarification sought around what the 10 year landbank applies to.	Amended wording, added 'construction aggregates' to clarify the policy only extends to aggregates.	To respond to stakeholder views. A landbank helps ensure we have an adequate supply of construction aggregates, it has no relevance to other mineral extractions.
Lack of clarity about the range of minerals and extraction covered under the policy and concerns regarding too narrow a focus construction aggregates. No reference is made to development of new mineral opportunities, other than in relation to aggregates and fossil fuels.	Amended wording to improve clarity and confirm application to mineral extraction.	To respond to stakeholder views.
The lack of cross referencing to policy 29 (Zero waste) was highlighted and there was a call for more emphasis	Now referenced in 'key policy connections'.	NPF4 should be read as a whole. Zero Waste policy sets out support for the reducing, re-using or recycling materials in line with the waste hierarchy.

Issue	Change	Reason/Comments
on minimising the use of new minerals.		
22 (b) planning applications to explore, develop and produce fossil fuels		
The reference to exceptions within the policy should be deleted.	No change.	Any such exceptions will be required to demonstrate that the proposal is consistent with national policy on energy and targets for reducing greenhouse gas emissions. The Scottish Government will publish its Draft Energy Strategy and Just Transition Plan later this year.
NPF4 does not recognise the need for critical minerals and role they would play in the indigenous supply chain for renewable energy industry.	Amended wording to improve clarity and confirm application to mineral extraction.	Revised NPF4 Policy 33(c) 'Minerals' sets out that development proposals that would sterilise mineral deposits of economic value will only be supported in certain limited circumstances.
22 (c) unconventional oil and gas		
There was a view that it would be better to simply state that the development of unconventional oil and gas is not supported, in line with other policies. Others suggested that (c) should state that such development is effectively prohibited.	No change.	Wording is clear that unconventional oil and gas is not supported.
22 (d) extraction of aggregates		
Extraction criteria set out are relevant for all types of minerals, the reference should not be only to aggregates.	Amended wording to improve clarity and confirm application to mineral extraction.	Revised NPF4 Policy 33(c) and (d) 'Minerals' refer.
A range of comments on minimising potentially adverse impacts, including that the policy should require biodiversity net gain, not just no adverse impact and that Historic Environment text is not proportionate or workable.	Amended wording to refer to 'significant' adverse impacts.	NPF4 should be read as a whole. A list of key policy connections has been added.

Issue	Change	Reason/Comments
For restoration and aftercare, clarity needed on what constitutes a 'high standard'. Buffer zone is being left to authorities to determine, guidance needed.	No change.	These will be matters for planning authorities to consider taking into account the specific circumstances of individual proposals.
22 (e) development proposals for borrow pits		
The requirement for borrow pits to be subject to the mineral extraction criteria and specifically having to have their own restoration bonds.	Added to the policy criteria for borrow pits: 'taking into account the temporary nature of the development'.	To respond to stakeholder views. This should allow planning authority some degree of flexibility to take into account local circumstances based around the development proposal itself.

Policy 23: Digital infrastructure

Summary of representations

Most supported the focus on ensuring all of Scotland’s places are digitally connected and felt that the policy provides a positive framework against which delivery of digital infrastructure can be assessed. There was also support for the particular focus on areas with no or low connectivity. Respondents highlighted the importance that all parts of Scotland have access to suitable digital infrastructure, with reference to the negative economic impacts of poor digital connectivity, particularly in rural areas.

Overview of changes

This is Revised NPF4 Policy 24 ‘Digital infrastructure’. This policy has had minor technical amendments which provides support to; the provision of appropriate, universal and future proofed digital infrastructure; ensure all parts of Scotland have access to suitable digital infrastructure to eliminate the digital divide; a sharp focus on delivery of digital infrastructure in remote and rural areas and areas with no or low connectivity; and ensure there is a suitable balance between any adverse impacts with social and economic benefits.

Issues raised and changes made

Issue	Change	Reason
23 (a) LDP should support delivery of digital infrastructure		
LDPs should focus on the provision of quality digital infrastructure available across their areas.	Further detail has been added to later policy criteria ‘including fixed line and mobile connectivity’.	To respond to stakeholder views.
23 (b) appropriate, universal and futureproofed digital infrastructure		
Support for delivery, detail needed to ensure consistent assessment of proposals.	Amended wording to give stronger support to proposals. Removed ‘this should be done in consultation with service providers’.	To respond to stakeholder views by strengthening policy and aiding clarity.
23 (c) deliver new digital services or provide technological improvements		
Highlighted potential for gaps in connectivity.	Amended to clearly support delivery - ‘Development proposals that are aligned with and support the delivery of local and national programmes for the roll-out of digital infrastructure will be supported’. Deleted – ‘planning authorities should not question the need for the	To respond to stakeholder views by strengthening policy and aiding clarity.

Issue	Change	Reason
	service to be provided where’.	
Highlighted potential for digital exclusion	Amended policy strengthened - ‘Development proposals that deliver new connectivity will be supported where there are benefits for communities and local economy’ Deleted ‘in areas with no or low connectivity where there are benefits of this’.	To respond to stakeholder views by strengthening policy and aiding clarity.
23 (d) proposals for telecommunications development		
Concerns raised to ensure that infrastructure is sited to avoid any adverse visual, amenity, environmental and landscape impacts. Technical constraints were acknowledged and the need to balance adverse impacts with social and economic benefits to local communities.	Amended ‘telecommunications’ to ‘digital infrastructure’. Inserted additional text which now reads ‘ the visual and amenity impacts of the proposed development have been minimised through careful siting, design, height, materials and landscaping, taking into account cumulative impacts and the relevant technical constraints’. Amended wording to aid clarity which now reads ‘it has been demonstrated that, before erecting a new ground based mast, the possibility of erecting antennas on an existing building, mast or other structure, replacing an existing mast and/or site sharing has been explored.	To respond to stakeholder views by strengthening policy and aiding clarity.

Issue	Change	Reason
23 (e) operation of existing digital infrastructure		
Concerns for impacts on surroundings.	Amended to refocus wording on what will be supported. Deleted section 'Development proposals that are likely to have an adverse effect on the operation of existing digital infrastructure or on the delivery of strategic roll out plans should not be supported unless appropriate mitigation measures can be provided' and replaced with criteria focused on visual and amenity impacts, consideration of using existing sites and physical obstructions.	To respond to stakeholder views and strengthen policy and aid clarity.

Policy 24: Centres

Summary of representations

There were positive comments on the role of LDPs in creating sustainable futures for cities, towns and local centres, alongside the principles of 20 minute neighbourhoods. There was also support for the focus on town centres and the recognition of their importance in many aspects of placemaking, health and quality of life.

Overview of changes

This is Revised NPF4 Policy 27 'City, town, local and commercial centres'. Policies 24, 25 and 26 cover city, town, local and neighbourhood centres and retail. These policies have been rationalised but the intent remains the same. Revised NPF4 Policy 27(d) has been drawn out from Policy 26(a) to specifically limit drive through facilities other than where supported in the LDP. This section has also been moved to the 'productive places' section, recognising the importance of centres to the economy.

Issues raised and changes made

Issue	Change	Reason
24 (a) supporting sustainable futures		
20MN will not be realistic in many rural areas.	Amended to reflect wording on local living and key policy connection to relevant policy.	To respond to stakeholder views. Policy on Local living also updated.
Could be a standalone policy for city centres.	Amended policy to bring together all centres and avoid repetition.	To respond to stakeholder views and provide clarity.
Definition of Sequential approach.	Policy wording has been changed to set out the policy more clearly. The policy sets out all development proposals will be consistent with town centre first approach.	To respond to stakeholder views and provide clarity. Supports the town centre first approach which was supported by most responses.
24 (b) improve the vitality and viability		
Concern that wording unclear and counter to policy on Retail.	Amended to include reference to enhancing and increasing mix of uses.	To help with clarity.
Several consultees queried Policy 25 and 26 and why non-retail issues were listed under the retail policy.	Wording on development proposals for non-retail uses has been moved to Revised NPF4 new policy 27 'City, town and commercial centres'.	To help with clarity and document flow in response to stakeholder views.

Issue	Change	Reason
Drive Through Developments - Several responses commented that drive throughs should be banned.	Amended policy wording from Draft policy 26(a) that development proposals for drive throughs will only be supported where specifically supported in the LDP.	To respond to stakeholder views and provide clarification.

Policy 25: Retail

Summary of representations

The further restrictions on out-of-town shopping proposals were supported.

Overview of changes

This is Revised NPF4 Policy 28 'Retail'. The policy has been amended to broaden its scope, the locational aspect that applied to development that will generate significant footfall now applies to all retail proposals to direct investment towards centres. The policy has also been strengthened to support local neighbourhood shopping to support local living.

Issues raised and changes made

Issue	Change	Reason/Comments
25 (a) development generating footfall		
Concerns that (a) could damage existing out of town centres.	Amended wording to clarify areas for retail development. Wording has been clarified to so that retail development will support existing centres, and areas for development can be allocated in the LDP in edge of centre sites. They should not be supported in out of town locations.	To respond to stakeholder views.
Policy fails to appreciate the challenges in smaller villages and towns across Scotland.	No change. Covered in other policies. NPF4 to be read as a whole.	To avoid repetition.
Query on defining edge of centre areas and the types and scale of development not appropriate for town centres.	No change.	Not for NPF4 content.
How to assess significant footfall?	Strengthened wording to direct all scales of retail development to be consistent with the town centre first principle.	To improve clarity and respond to stakeholder views.

Issue	Change	Reason/Comments
25 (b) impact on character and amenity of an area		
How to demonstrate compliance and address acceptable impacts?	No change.	Not for NPF4 content.
25 (c) avoiding clustering of some non-retail uses		
Query about the degree of clustering acceptable and how it can be avoided.	No change. Wording remains, has moved section to Revised NPF4 Policy 27 'City, town, local and commercial centres' LDP section and part (c).	Not for NPF4.
Policy could consider food vans in the vicinity of primary and secondary schools, as well as play and sports areas and prevent clustering of outlets that damage health and wellbeing.	No change.	Revised NPF4 Policy 27(c) 'City, town and commercial centres' includes permanently sited vans in the non-retail uses that will not be supported under certain circumstances, which includes undermining the health and wellbeing of communities. Clustering evidence included in Revised NPF4 Policy 27 LDP section. Schools and community facilities are not specifically addressed as the policy outcome is to promote development in city, town and local centres.
Should include a presumption against drive-through retail.	Amended policy wording that development proposals for drive throughs will only be supported where specifically supported in the LDP.	To respond to stakeholder views.
25 (d) neighbourhood shopping		
A more proactive approach could be taken to support access to healthy food.	Strengthened support for new neighbourhood shopping where it supports local living and principles of 20 minute neighbourhoods and/or contributing to health and wellbeing of local community.	To respond to stakeholder views.

Issue	Change	Reason/Comments
	Revised NPF4 Policy 28 'Retail' LDP section encourages planning authorities to identify areas where proposals for healthy food and drink outlets can be supported.	
Should be expanded to include a broader range of businesses that negatively impact health outcomes.	No change.	To avoid repetition NPF4 is to be read as a whole. Addressed in Revised NPF4 Policy 27(c) 'City, town, local and commercial centres' provides for not supporting uses, including examples, if they undermine health and wellbeing. This is flexible to allow other non-retail uses to be included locally.
25 (e) islands and rural areas		
'Ancillary uses..' unhelpful and restrictive.	No change to use of ancillary, given its common/established use in the planning system.	Policy more widely amended for clarity. Revised NPF4 Policy 28(d) 'Retail' is intended to enable appropriate development in rural and island areas (not in town/local centres).

Policy 26: Town centre first assessment

Summary of representations

There was support for the focus on town centres and the recognition of their importance in many aspects of placemaking, health and quality of life.

Overview of changes

This policy was removed as a standalone policy, and incorporated into the Revised NPF4 Policy 27 ‘City, Town, Local and Commercial Centres’.

Issues raised and changes made

Issue	Change	Reason/Comments
26 (a) other uses which will generate significant footfall		
For education and healthcare facilities, may be more appropriate to reference locations that support 20MN.	Amended to state that will be supported in existing city, town and local centres.	To respond to stakeholder views.
Proposals within existing business parks should not have to undergo a town centre first assessment.	No change.	Proposals will be supported in commercial centres if allocated as sites suitable for new retail development in the LDP.
Should address ‘mini town centres’.	Amended to clarify the role of LDPs in identifying a network of centres.	To respond to stakeholder views.
Clarify that appears to apply to non-retail uses.	Amended policy addresses proposals for non-retail uses.	To respond to stakeholder views.
26 (b) relationship of the proposed development with a network of centres		
Requirement for sequential test to consider supply chains queried.	No change.	Consideration of supply chains, local suppliers and workers can help to support community wealth building.
26 (c) community, education, health and social care, sport and leisure facilities		
Strengthen by stating that facilities will be accessible through walking, wheeling and cycling.	No change.	To avoid repetition. Addressed in Revised NPF4 Policy 13 ‘Sustainable transport’. NPF4 is to be read as a whole.

Policy 27: Town Centre Living

Summary of representations

There were positive comments on the role of LDPs in creating sustainable futures for cities, towns and local centres, alongside the principles of 20 minute neighbourhoods.

Overview of changes

This is Revised NPF4 Policy 27 'City, town, local and commercial centres'. This policy has been amended to reflect concerns about the impact of residential development in town centres, particularly at ground floor level, and to emphasise the need for residential amenity to be taken into account. This policy section has been integrated into Revised NPF4 Policy 27.

Issues raised and changes made

Issue	Change	Reason/Comments
27 (a) encouraging town centre living		
Requirement for LDPs to include a proportion of local housing land. Some consultees requested more detail or a percentage that should be allocated.	Moved to LDP requirements. Percentage not added.	No further detail has been added as each city/town will have individual opportunities for more housing, while maintaining (or improving) the vitality and viability of the centre.
Needs cross-referencing to policy on homes.	Added 'key policy connections' including 'Quality homes'.	To respond to stakeholder views. NPF4 is to be read as a whole.
Queried whether city centre living was included in this policy.	'City' added to Revised NPF4 Policy 27(e-g) to clarify.	To clarify scope in response to stakeholder views.
27 (b) new residential development		
Clarity on whether both new build and reuse of buildings can be used for city/town centre living.	Changed wording to clarify both new build and reuse of buildings can deliver city/town centre living.	To respond to stakeholder views.
Contradicts policy on reuse of existing buildings.	No change.	To avoid repetition. NPF4 is to be read as a whole.
27 (c) conversion or reuse of vacant upper floors for residential use		
No change.	No change.	No change.
27 (d) residential use at ground floor level		
Residential use at ground floor is inconsistent with 20MN concept and planning authorities should be able to apply discretion.	No change.	The Draft NPF4 policy wording allows for consideration of vitality and viability of centre.
27 (e) residential amenity		

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Draft Policy 27: Town Centre Living

Issue	Change	Reason/Comments
Include entertainment venues in list of uses.	No change.	To avoid repetition. NPF4 is to be read as a whole and Revised NPF4 Policy 31 'Culture and Creativity' covers arts venues.
Lack of mention of design, public realm, etc.	No change.	To avoid repetition. NPF4 is to be read as a whole.
Achieving residential amenity.	Wording changed to emphasise that the developer must show how residential amenity can be achieved.	To respond to stakeholder views.
Call for consideration of climate adaptation and mitigation to be explicit in these developments, and following the six principles of quality design.	No change.	UK Climate Change Committee Request. To avoid repetition. Covered in other Revised NPF4 policies: 2 'Climate mitigation and adaptation' and 14 'Design, quality and place'.
Ensure that residences are suitably located relative to amenities as to avoid locking in dependence on high-carbon modes of travel.	Added 'Key policy connections', including: 'Local living and 20 minute neighbourhoods'.	UK Climate Change Committee Request. The policy approach recognises that city and town centres are generally well connected by active travel and public transport, with potential to contribute to broader aims including car kilometre reduction.

Policy 28: Historic assets and places

Summary of representations

Many respondents welcomed the protection and enhancement of the historic environment, and there was support for the reuse of redundant or neglected historic buildings. However, there were also concerns that the policy could prevent developments that address climate change issues from going ahead.

Overview of changes

This is Revised NPF4 Policy 7 ‘Historic assets and places’. This policy remains largely the same, although wording has been refined for consistency. We remain of the view that the policy is proportionate and in line with the Historic Environment Policy for Scotland. This policy has been moved to the ‘sustainable places’ section, recognising its protective approach and the role of maintaining and reusing the historic environment as part of our response to climate change.

Issues raised and changes made

Issue	Change	Reason/Comments
28 (a) LDPs and their spatial strategies should identify, protect and enhance valued historic assets and places		
Omits reference to the Historic Environment Policy for Scotland.	Clarification has been included within Revised NPF4 Policy 7(a) ‘Historic assets and places’ that proposals should be ‘informed by national policy and guidance on managing change in the historic environment...’	To respond to stakeholder views. Broad reference to national policy and guidance has been included in Revised NPF4 Policy 7(a) ‘Historic assets and places’. Naming specific documents may date NPF4 as these may change during its lifetime.
Definition of status of assets should be clarified.	No change.	The Glossary provides definitions of historic assets, including their status.
Amend to ensure delivery of public benefit.	No change.	Note that the inserted ‘policy outcomes’ recognise key elements of the value of the historic environment.
Clarify that proposals should result in positive enhancements.	No change.	Policy sets out that LDPs ‘...should identify, protect and enhance valued historic assets and places.’

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Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
28 (b) impact on historic assets or places		
Not clear how 'potentially significant impact' is determined.	No change. Reference to 'potentially significant impact' remains, but within broader amended wording.	Beyond the scope of NPF4. This will need to be determined on a case by case basis.
The requirement for planning authorities to consider 'whether further and more detailed assessment is required' could result in disproportionate levels of scrutiny.	Wording removed.	To respond to stakeholder views. Clarification provided over when assessment is required to accompany development proposals.
Strengthen policy with cultural significance as starting point for assessing proposals.	Amended policy text - stronger wording with cultural significance as a basis for assessment.	To respond to stakeholder views.
Clearer on mechanisms to establish benchmark for assessment.	No change.	Mechanisms to establish benchmark are for those who are undertaking the assessment, in liaison with the decision maker to ensure the appropriate level of information is established to inform the decision making process.
Include reference to Historic Environment Records.	Added reference to Historic Environment Record (HER).	To respond to stakeholder views. This recognises the role of HERs in managing Scotland's historic environment.
Reference Circular 2/2009, PAN 2/2011 and consider terms of 1997 Act with regard to Listed Building and Conservation Areas.	No change.	Naming of PANs/Circulars not included to avoid dating the document. Naming legislation does not change the status or relevance of any such legislation, nor the need to comply with it.
28 (c) demolition of listed buildings or other works that adversely affect the special interest of a building or its setting		
Potential tension between protection of historic assets and meeting climate and net zero goals.	No change. Revised NPF4 Policy 1 'Tackling the climate and nature crises' gives significant weight to the global climate emergency in order to ensure that it is	Committee Request (NZET). NPF4 should be read as a whole and other policies cover climate and net zero. Every application should be considered on its own merits. Also note that 'Key

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Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
	recognised as a priority in all plans and decisions.	policy connections' have now been added to policies identifying inter-relationships.
Opportunity to strengthen protection with stronger presumption against demolition.	Amended wording from 'should not' to 'will not' be supported. Greater detail provided on considerations for exceptional circumstances.	To respond to stakeholder views and provide clarity.
Policy should include support for demolition where proposals contribute to net zero and deliver other benefits.	No change.	Other policies within NPF4 deal with net zero objectives. Any such proposals need to be considered on a case by case basis in line with the policy. NPF4 should be read as a whole.
Definition of exceptional circumstances required for clarity.	Amended. Greater detail provided on considerations for exceptional circumstances.	To respond to stakeholder views.
(c) and (d) overlap in the development proposals they cover.	Amended. Removal of 'or other works'.	To respond to stakeholder views and to provide clarity over policy intent.
28 (d) reuse, alteration or extension of a listed building		
Could be more support for positive change.	No change.	This policy is intended to protect listed buildings, by only supporting those proposals for their reuse, alteration or extension where they will preserve its character, special architectural or historic interest and setting. The policy does not preclude supporting positive change, where the above is achieved.
Challenge of compliance with energy efficiency regulations could be more explicit.	No change.	NPF4 should be read as a whole. It is for the decision maker to determine applications in view of the policy position.
Should recognise that loss of heritage assets may be acceptable in some circumstances.	No change.	Policy relating to demolition of listed buildings sets out exceptional circumstances

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Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
		and relevant considerations.
28 (e) preserve or enhance the character and appearance of conservation areas and their settings		
Should acknowledge statutory duties of planning authorities to preserve and enhance listed buildings and conservation areas.	No change.	Not necessary for NPF4 to repeat the legislation and list the statutory duties of planning authorities.
Clarity on whether the policy relates to development outside a conservation area that impacts the setting or those inside that affect the character and appearance.	Amended. The revised policy wording refers to both 'Development proposals in <u>or affecting</u> conservation areas...'	To respond to stakeholder views and add clarity to policy.
Reference to Conservation Area Character Appraisal/ Management Plan	Amended. Reference removed	Not necessary inclusion for national policy.
Where development is outside a conservation area or other heritage sites boundary, and will have a negative effect, should be a material consideration.	No change.	It is not the role of NPF4 to identify material considerations. NPF4 will be part of the development plan, which means that planning decisions should be made in accordance with it, unless material considerations indicate otherwise.
Other NPF4 policies should refer to the character and appearance of historic assets as an important material consideration.	Amended. No reference to 'material consideration', however, policy connections are now included for relevant NPF4 policies.	To respond to stakeholder views and add clarity. It is not the role of NPF4 to identify material considerations.
28 (f) demolition of buildings in a conservation area		
Does not address removing assets that are beyond repair/ have no useful future or can't be safely maintained.	No change.	Criteria are considered robust and cover the relevant elements for planning purposes.
Policy should consider environmental impact of buildings, e.g. alterations could improve climate resilience and biodiversity, and reduce carbon emissions.	No change.	NPF4 policies need to be considered in the round. It is for the decision maker to determine applications on a case by case basis.

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Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
28 (g) existing natural and built features which contribute to the character of the conservation area and/or its setting		
Should balance protection of historic assets vs protection of environment, where latter is in broader public interest.	No change.	It is for the decision maker to balance competing interests depending on the circumstances of each individual case. NPF should be read as a whole.
28 (h) Scheduled monuments		
Text setting the context around Scheduled Monuments and their designation.	Amended. Wording removed.	Unnecessary context for policy.
Scheduled Monument policy too restrictive for impacts on setting. Seek concept of 'integrity of setting' to be referenced. Equally other comment that supported no reference to 'integrity of setting'.	Amended key elements of policy wording: 'will only be supported' and 'significant adverse impacts' on the integrity of the setting of a scheduled monument are avoided.	To respond to stakeholder views and add clarity to policy. Wording amended to clarify the level of impact on setting, that should not be supported. 'Integrity of setting', which was included in SPP, introduced to focus on setting in terms of cultural significance.
Exceptional circumstances - impacts on the monument or its setting should be minimised and mitigated as far as possible.	Amended. Reference to 'mitigated as far as possible' removed.	To respond to stakeholder views. Focus on minimising impacts.
Some development should take precedence over heritage.	No change.	Criteria sets out circumstances which will be supported, including prospect for 'exceptional circumstances'.
Seek clarification that development located outwith protected areas which impact scheduled monuments will be a material consideration.	No change.	It is the role of the decision maker to determine what is a material consideration, taking into account the specifics of each case.
28 (i) Inventory of Gardens and Designed Landscapes		
Should set out measures to protect areas where development takes place close to boundaries.	Amended wording to clarify it is development proposals affecting nationally important Gardens and Designed Landscapes, more	To respond to stakeholder views.

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Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
	broadly, that should be considered.	
Impact on important views to, from and within the GDL, or its setting.	Amended. 'Significantly' has been added.	To clarify the level of impact on views and setting that should not be supported.
Technical references within policy.	Amended. Removed technical references to 'setting of component features'.	To respond to stakeholder views.
Flexibility should be included for critical infrastructure where there are no suitable alternatives.	No change.	Not necessary to include an exemption for critical infrastructure. It is for the decision maker to determine the merits of a proposal.
28 (j) Inventory of Historic Battlefields		
Need consistent approach to wording of tests in (i) and (j). Historic Battlefield policy considered to be weaker.	Amended. Historic Battlefield includes strengthened wording 'will only be supported where'.	To respond to stakeholder views and add clarity to policy.
Proposal should not have to be within boundary of battlefield to require consideration of potential impact.	Amended wording to clarify that it is impacts on Historic Battlefields in the round which need to be considered.	To respond to stakeholder views and add clarity.
28 (k) Historic Marine Protected Areas		
Should also cover construction of coastal defences, etc.	Amended wording to include 'proposals at the coast edge...'	To respond to stakeholder views and add clarity.
28 (l) World Heritage Site or its setting		
Natural heritage sites such as St Kilda would be better covered under Policy 32 (Natural Places).	No change.	NPF should be read as a whole. See 'How to Use this Document' Annex.
28 (m) enhance and bring back into beneficial use historic environment assets identified as being at risk		
Extend policy to cover all currently unused historic buildings, rather than limited to the Buildings at Risk Register (BARR).	Amended. Policy extended to cover both BARR and local identified buildings at risk.	To respond to stakeholder views.
Reference to historic environment assets.	Amended. Reference to 'historic environment assets' replaced with 'historic buildings'.	To respond to stakeholder views.

PART 3 – National Planning Policy
Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
28 (n) Enabling development for historic assets or places that would otherwise be unacceptable		
Query over whether climate change adaptations constitute securing 'the future of the historic environment'.	No change.	The specific circumstances of applications which may qualify under this policy are for the decision maker to determine.
28 (o) adverse impacts on non-designated historic environment assets, areas and their setting		
Include a definition of non-designated assets/details on their scope.	No change.	Definitions for designated assets are in the Glossary. It is not for NPF4 to define the scope of non-designated assets.
Include a requirement for pre-determination evaluation. Reinstate SPP requirement for developer to provide information on archaeological features.	Amended wording to clarify that where there is the potential for non-designated archaeology, developers to provide an evaluation at an early stage.	To respond to stakeholder views.
Should reference activities to provide public benefit.	Added reference to public benefit.	To respond to stakeholder views.
Better alignment with focus on retention and reuse of buildings and emphasis on finding viable uses.	Amended wording now includes reference to historic buildings as part of the pre-determination evaluation.	To respond to stakeholder views. Provisions in NPF4 policy on Brownfield, Vacant and Derelict Land and Empty Buildings also relevant. NPF4 should be read as a whole.
Where impacts cannot be avoided they should be minimised and mitigated as far as possible.	Amended to remove 'and mitigated as far as possible'.	To respond to stakeholder views. Focus on minimising impacts.
28 (p) archaeological discoveries		
Focused on known assets, must ensure evaluation of archaeological potential is protected.	Amended. Policy wording strengthened, setting out that ' new archaeological discoveries... must be reported to the planning authority...'	To respond to stakeholder views. See also response to Draft NPF4 policy 28(o) with regard to requirement for pre-determination evaluation.
Role of HES should be acknowledged.	No change.	Not necessary for NPF4 to set out the roles of other public bodies.
Policy on non-designated archaeology is weakened	Amended text to include reference to pre-determination evaluation.	To respond to stakeholder views.

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Draft Policy 28: Historic assets and places

Issue	Change	Reason/Comments
compared to that contained in SPP.		The policy on non-designated archaeology is in line with the thrust of policy in para 150 of SPP.
Policy does not acknowledge that mitigation can occur during development. Re-word in line with para 31 of PAN 2/2011.	No change. Note, the policy does reference 'appropriate inspection, recording and mitigation measures'.	To respond to stakeholder views.

Policy 29: Urban edges and green belt

Summary of representations

There was general support for the policy, with respondents welcoming the use of green belts to help regulate development outside urban centres and limit urban expansion. However, some respondents had concerns, including that it refers to the green belt. The connected concern was that this may encourage planning authorities to adopt a brownfield-only approach.

Overview of changes

This is Revised NPF4 Policy 8 'Green belts'. This policy has been renamed 'green belts' to provide more clarity on its purpose and limit its application to designated green belts. It has been restructured to provide more clarity on the tests to be applied to proposals. It has also been moved to 'sustainable places'.

Issues raised and changes made

Issue	Change	Reason/Comments
Title - Various respondents noted the title was not consistent with the policy's contents.	Changed title from 'Urban Edges and the Green Belt' to 'Green Belts'.	To respond to stakeholder views and reflect that the policy is focussed on green belt matters.
Scope - Several respondents including planning authorities asked about, and for reference to equivalent style policies e.g. 'Countryside around towns'.	No change.	This policy is focussed on green belts, the Rural Homes and Rural Development policies cover other aspects of countryside policy.
Purpose/Policy Outcomes - Various comments, including the green belt campaign sought more detail and clarity on the purpose of the green belt.	Added new sections on 'policy intent' and 'policy outcomes'.	To respond to stakeholder views. The new policy outcomes, are essentially the purpose of green belts and provide direction on the roles, uses and benefits of green belts.
29 (a) LDPs should consider using green belts where appropriate		
Delivery through Development Plans – spatial strategy.	Added text to make a direct link to green belts' potential to support LDPs' 'spatial strategy'.	Clarity of message. To emphasise the role of green belts as a settlement management tool to support the spatial strategy of LDPs, and the plan led system.
Delivery through Development Plans	Removed phrase	To respond to stakeholder views.

PART 3 – National Planning Policy
Draft Policy 29: Urban edges and green belt

Issue	Change	Reason/Comments
<p>– most accessible or pressured rural or peri-urban area/ suburbanisation. Housebuilders argued that peri-urban' development is not inherently unsustainable, and that the most accessible areas 'are the most sustainable, where 20 MN could be easily introduced'.</p>	<p>'in some of the most accessible or pressured rural or peri-urban areas'</p>	<p>The amended text retains the message about where green belts should be used where there is 'significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside.'</p>
<p>Clarity on types of changes possible as a result of green belt review Several respondents expressed concern that the draft policy could solely relate to extending green belt areas, but not considering land releases as part of the LDP.</p>	<p>Added wording to confirm changes can be made following reviews to accommodate planned growth, or to extend, or alter the area covered as green belt.</p>	<p>To respond to stakeholder views. This point had been set out in the Draft LDP guidance (para 445).</p>
<p>29 (b) development proposals within a green belt designated within the LDP should not be supported unless for</p>		
<p>Some responses suggested this policy be worded more positively, as to what is acceptable development in the green belt.</p>	<p>No change.</p>	<p>This policy is intended to be a more restrictive policy to protect zoned greenbelt land. However, the policy outcomes now emphasise the positive roles and contribution of green belts.</p>
<p>Residential accommodation for a worker in a primary industry within the immediate vicinity of their place of employment - 'key workers'.</p>	<p>Amended wording clarifying that the reference to the accommodation for workers in a primary industry to be for 'key' workers</p>	<p>Clarity of message.</p>
<p>Homes for Retired workers - a few comments expressed concern about this use, and tying the property to those types of residents.</p>	<p>No change.</p>	<p>We understand retired workers in a primary industry e.g. retired farmers can have strong ties to their land and may wish to build a retirement home to remain there, and that this could support succession planning in primary industries. Conditions can</p>

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Draft Policy 29: Urban edges and green belt

Issue	Change	Reason/Comments
		be used on the design of such homes in the limited number of cases no other suitable residential accommodation is available.
Horticulture and 'directly connected retailing' - some responses queried the use of this term.	No change.	This wording is already in established use (in SPP 2014).
Play – a respondent suggested adding reference to 'play' within the section on recreation, outdoor sport and leisure.	Added reference to outdoor play.	To respond to stakeholder views and in recognition of wider policy promotion of play opportunities and the Child's Right to Play.
Core Paths - Ramblers Scotland sought further text be added on access rights.	Added reference to 'core paths' as being an acceptable use in green belts.	To respond to stakeholder views.
Development meeting a national requirement or established need if no other suitable site is available – calls for certainty on what constitutes a 'national requirement or established need'	Removed bullet.	To respond to stakeholder views, and as it is considered that these types of development would be covered by other bullets within Revised NPF4 Policy 8 'Green belts' part (a)(i) e.g. essential infrastructure, or renewable energy developments.
'Essential infrastructure' - some responses suggested additional types of infrastructure to be included in the green belt policy's explanation of this term i.e. 'water and waste water infrastructure' and 'healthcare facilities'.	Removed the illustrative list of types of 'essential infrastructure' from the green belt policy, and added a definition of the term within the Glossary.	To help with document flow. It is considered more appropriate to provide a definition of 'essential infrastructure' in the Glossary.
A small number of comments from individuals, concerned that minerals operations should not be an acceptable use in green belts.	No change.	We acknowledge that minerals operators need to go to where the resource is. Revised NPF4 Policy 8 'Green belts' part (a)(ii) ensures there will be no significant long-term impacts on the environmental quality. Additionally the Revised

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Draft Policy 29: Urban edges and green belt

Issue	Change	Reason/Comments
		NPF4 Policy 33 'Minerals' applies, and provides that proposals should not result in significant adverse impacts on the natural environment and should include schemes for a high standard of restoration and aftercare.
Concern about the reference to Areas of Search, noting no such areas of search exist, as Draft NPF4 does not carry forward SPP's Spatial Framework for onshore wind farms, or require areas of search for minerals.	Policy amended to delete 'where located within an identified area of search'.	Correction responding to stakeholder views. The removal of the reference to areas of search promotes consistency with the Revised Draft's renewable energy and minerals policies.
Intensification of established uses – clarification sought on whether this meant intensification within the boundary of an existing use, or whether this would permit increasing its extent. Some energy responses queried if this includes repowering	No change.	Not considered necessary – it is a matter for the decision maker. The policy provides for renewable developments (which could include repowering) and the Energy policy provides support for repowering and expanding existing wind farms.
'One-for-one replacements of existing permanent houses currently in occupation' – editing analysis identified repetition within this wording, that could be sharpened.	Policy amended to delete 'currently in occupation'	To use more concise language. The policy still requires the properties to be existing permanent houses.
29 (c) reasons as to why a green belt location is essential		
Statement identifying search area and site options assessed. Renewable interests were concerned the wording would be a barrier to development, that the draft policy was essentially developers to requiring provide a 'sequential test'	<p>Changed from requiring a 'statement', and setting out what that should cover, to just requiring 'reasons as to why a green belt location is essential'.</p> <p>Removed reference to search areas and assessing site options.</p>	To respond to stakeholder views. The revised version provides a more proportionate approach to information to support a planning application, by reducing the number of statements required. The requirement for reasons is still considered

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Draft Policy 29: Urban edges and green belt

Issue	Change	Reason/Comments
and that there is no cap on renewables deployment.		appropriate for development green belts, given its protective nature, the policy leaves opportunity for prospective developers to make their case as to why they wish to develop within it. Reasons could now be simply incorporated within a general planning statement.
Various responses suggested that all the potential exceptions should be compatible with a countryside or natural setting not just the fourth bullet on recreation and sport.	Removed wording from individual policy bullet. Revised NPF4 Policy 8(a)(ii) 'Green belts' ensures the 'compatible' wording applies to all types of development in green belts.	To provide consistency of requirement across the list of acceptable uses.
Cross references to other policies.	Third sentence of draft policy (c) removed. The Revised Draft now contains 'Key policy connections'.	To help with document flow. The new Key policy connections highlights links to other policies, including those that had been in the removed sentence in part (c) on design, the historic environment and green and blue infrastructure.
29 (d) proposals on sites in green belt		
'Proposals on sites in the green belt for other types of development should not be supported' - several respondents suggested this part of the policy be removed to remove repetition.	Removed policy sub-section.	To respond to stakeholder views and avoid duplication. The policy intent of this sub-section remains covered. Revised NPF4 Policy 8(a)(i) 'Green belts' is clear that 'Development proposals within a green belt designated within the LDP will not be supported' unless for one of the listed types of development, therefore we do not need the further reiteration that was in part (d).
A definition of green belt in the Glossary was	No change.	The purposes of green belts are covered within the

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Draft Policy 29: Urban edges and green belt

Issue	Change	Reason/Comments
sought by a series of campaign responses.		policy itself under the Policy intent and Policy outcomes.

Policy 30: Vacant and derelict land

Summary of representations

There was broad support for this policy, which was seen as critical to protecting greenfield land and the reuse of underused land. A number of respondents noted the challenges associated with the reuse of vacant and derelict land and buildings, including around costs limiting the market’s ability to develop sites. It was noted that public sector investment is often required, and also that many of the more straightforward sites have already been developed, with those remaining generally needing more significant remediation.

Overview of changes

This is Revised NPF4 Policy 9 ‘Brownfield, vacant and derelict land and empty buildings’. This policy has been reworded for clarity with a minor addition to reflect the benefit of reusing empty buildings for embodied energy. It has also been moved to ‘sustainable places’.

Issues raised and changes made

Issue	Change	Reason/Comments
Policy title to include buildings.	Clarified policy title to include buildings.	To respond to stakeholder views.
While the high-level policy talks about using vacant or derelict land to contribute to climate targets and support biodiversity and resilience, it is not mentioned in the listed policy proposals.	Revised policy layout includes key policy connections.	To respond to UK Climate Change Committee and stakeholder views. Revised NPF4 Annex A ‘How to Use this Document’ outlines that NPF is to be read as a whole.
Policy does not acknowledge rural locations, e.g. sites in rural areas not suitable for new development.	Added reference to sustainability of sites and biodiversity value. Policy wording amended to take into account biodiversity value of sites and sustainable reuse of brownfield land, directing development to the right locations.	To respond to stakeholder views.
Query if only sites on VDL Register apply.	Amended text to cover all brownfield land.	To respond to stakeholder views. See definitions of brownfield and VDL.
Should be explicit policy for developing VDL into productive greenspace.	Use for productive greenspace recognised as potential policy outcome.	Revised policy layout includes key policy connections.

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Draft Policy 30: Vacant and derelict land

Issue	Change	Reason/Comments
30 (a) reuse VDL and buildings as a priority		
No evidence to support prioritising VDL at expense of greenfield release.	No change.	NPF4 should be read as a whole. It is widely recognised that the sustainable reuse of vacant and derelict land will provide benefits to society, including by helping to address the adverse impacts of legacy sites on neighbouring communities for example, see the work of the Scottish Land Commission and Vacant and Derelict Land Taskforce. This is also reflected as a priority in the Land Use Strategy.
Should make clear that some sites may naturalise.	Reference added to sustainability and biodiversity value.	To respond to stakeholder views.
Clear commitment to CPO and sales orders needed.	No change.	SG has already made separate commitments regarding compulsory purchase reform. See delivery programme.
30 (b) permanent or temporary reuse supported		
Should be a distinction between urban and rural brownfield land.	Amended text to cover all brownfield land.	To respond to stakeholder views. See definitions of brownfield and VDL.
Not all VDL is in sustainable locations.	Amended policy wording to take into account sustainability of sites. Reference made to sustainability and biodiversity value	To respond to stakeholder views.
30 (c) proposals on greenfield sites not supported		
Definition of 'sustainable brownfield alternatives'.	Wording removed.	To add clarity and respond to stakeholder views.
Consider potential biodiversity value of some brownfield sites.	Wording amended to take into account biodiversity value of sites. Refers to sustainability and biodiversity value.	To respond to stakeholder views.
Remove criterion.	No change.	Criterion remains, with amendments to strengthen commitment to climate emergency.

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Draft Policy 30: Vacant and derelict land

Issue	Change	Reason/Comments
Include approach that would consider greenfield sites where assessment determines are more viable than brownfield.	No change.	Policy is clear that greenfield will only be supported if supported through site allocation or policies within the local development plan.
30 (d) demonstrate that unstable/contaminated land is, or can be made, safe		
Should apply to all developments and not just VDL.	No change.	NPF4 should be read as a whole.
30 (e) reuse of existing buildings		
Would benefit from standard requirement for justifying a building being demolished rather than reused.	No change.	Revised policy layout includes key policy connections. Demolition is the least preferred option and should have overall benefits in terms of emissions including embodied carbon.
Stronger emphasis on demolition only as last resort.	No change.	NZET Committee request. Stakeholder request. This is stated in the policy.
Should be cross-referenced with requirements on carbon life cycle assessment.	Policies now include links to key policy connections.	NPF4 should be read as a whole.

Policy 31: Rural places

Summary of representations

Some respondents welcomed the inclusion of a policy specifically for rural places or indicated support for the intent and ambitions set out. However, it was also suggested that the policy is too broad, or that the support for new development in rural areas risks undermining sustainability and climate change objectives. There was also a view that, as drafted, the policy will not deliver the outcome of increasing the population of rural areas.

Overview of changes

This is Revised NPF4 policies 17 'Rural homes' and 29 'Rural development'. This policy has been updated and split into two sections – rural housing and rural development and revised drafting to give greater clarity on the overall intent of supporting vibrant and sustainable rural communities. More clarity on the policy for resettling previously populated areas has been provided in both, making clear support for development in principle but requiring suitable areas to be identified in the Local Development Plan and proposals to be designed to a high standard and compatible with climate targets. The policy is now explicitly linked to the urban-rural typology mapping, so that it is clear where rural and remote rural policies apply.

Issues raised and changes made

Issue	Change	Reason/Comments
Some felt the policy is weak, confusing, vague, or too broad, whilst some felt the support for new development in rural areas risks undermining sustainability and climate change objectives. It was asked that NPF4 offer more of a vision for rural communities, with particular emphasis on population growth and affordable housing.	Rural Places policy has been split into two policies: Revised NPF4 policies 17 'Rural Homes' and 29 'Rural Development'. Re-structured text and wording changed throughout to improve clarity. Drafting changes made to ensure fragile communities are considered and to enable homes where there is an essential need for a worker of a rural business and to provide for retirement succession.	To provide clarity of message and help with document flow in response to Committee (RAINE) and stakeholder views.
Particularly with respect to housing, the categories of acceptable rural development in Policy 31 are too narrow and will not deliver the outcome of increasing the population of rural areas.	Rural Places policy has been split into two policies: Revised NPF4 policies 17 'Rural Homes' and 29 'Rural Development', with the Rural Homes policy bringing greater clarity of meaning and better	To respond to stakeholder views, and provide clarity of message and help with document flow. Splitting the policies has enabled the text to be clearer on the overall intent of supporting vibrant and

PART 3 – National Planning Policy
Draft Policy 31: Rural places

Issue	Change	Reason/Comments
	alignment with other policies throughout the document with regards to housing.	sustainable rural communities. Close link with housing policy provides flexibility to respond to rural circumstances.
Policy fails to recognise the role rural areas will play in helping to deliver additional generation of renewable energy and that some aspects of rural places will inevitably change as a result.	No change.	NPF4 is intended to be read as a whole, and therefore this policy will apply alongside other policies including 1: Tackling the climate and nature crises, and 11: Energy.
Comments included that it will be important to establish what is meant by 'accessible', 'intermediate', 'remote' and 'areas of pressure and decline' and to be clear which form of the Scottish Government's Urban/Rural Classification is to be applied.	Rationalisation of terms to avoid confusion and improve clarity of drafting. Clarification added to the LDP text to specify which classification should be used to identify remote rural areas.	Responding to stakeholder views and providing clarity of message. The Scottish Governments 6 fold Urban Rural Classification 2020 should be used to identify remote rural areas.
31 (a) LDPs set out proposal to support rural communities and economies		
The requirement at a) for LDPs to 'set out an appropriate approach to development in areas of pressure and decline...' is undermined by later sections that set out the approach, irrespective of local conditions.	Re-structured text to help document flow and clarity of message. Wording, formatting and language changes made.	To respond to stakeholder views. Provide clarity of message and help with document flow.
The range of rural spatial concepts should be rationalised to ensure deliverability.	Formatting and rationalisation of terms to avoid confusion and improve clarity of drafting.	To respond to stakeholder views. Changes made in line with wider changes to wording within the spatial strategy section of NPF4 – wording now consistent throughout.
31 (b) resettlement of previously inhabited areas		
Clear tensions between the resettlement of previously inhabited areas and sustainable placemaking.	LDPs to identify areas which are suitable for resettlement. More clarity on the policy for resettling previously populated areas, making clear support for	To respond to stakeholder views. To provide clarity of message and help with document flow.

Issue	Change	Reason/Comments
	development in principle but requiring suitable areas to be identified in the LDP and proposals to be designed to a high standard and compatible with climate targets.	
Calls for clarification of what by is meant by 'previously inhabited areas' including: at what point in history; how long; what types of habitation; and whether this refers to areas or individual sites.	No change.	It is neither possible nor appropriate to define this in detail at a national scale. Previously inhabited areas which are suitable for resettlement should be identified in the LDP spatial strategy.
Suggestion that supporting development only where climate change mitigation targets are being met could act as a veto on almost all proposals for resettlement, and that such a test should not be applied to small scale rural housing proposals.	Re-worded policy to offer better clarity on what type of proposals would be acceptable.	Clarity of message.
20 minute neighbourhoods present challenges for rural areas or it is inappropriate for rural areas.	Removed reference to 20 minute neighbourhoods.	To respond to stakeholder views. We recognise concerns that the term is not as easily translated to rural populations/locations as urban locations. Guidance will demonstrate through the use of exemplars, how rural places can be supported through the concept of Local living. Reference to Local living more appropriate, see Revised NPF4 Policy 15 'Local living and 20 minute neighbourhoods'.
It was suggested that NPF4 should recognise that people are required to live in these areas in order to manage them most effectively.	Amended drafting to ensure NPF4 is supporting development in principle but requiring suitable areas to be identified.	To respond to Committee (RAINE).

Issue	Change	Reason/Comments
It was suggested that there are areas where further detail is required in NPF4. For example, there are issues in relation to rural housing that need to be addressed such as lack of affordable housing in rural areas and lack of housing more generally preventing rural communities from being able to attract new residents.	Rural Places policy has been split into two policies: Revised NPF4 policies 17 'Rural Homes' and 29 'Rural Development'. Within Rural Homes Policy, drafting changes made to ensure reference to affordable housing and an addition of the 'economic considerations' as a reference to consideration of supporting employment in rural areas.	To respond to Committee (RAINE).
31 (c) development proposals in rural areas		
Not clear which criteria apply mutually or exclusively.	Drafting changes to clarify meaning.	To provide clarity and respond to stakeholder views.
The term 'development pressures' could be misapplied or contrived for different outcomes.	Drafting changes for clarity.	To provide clarity and respond to stakeholder views.
Comments around the terminology used not being consistent with other areas of NPF4, and the restrictiveness of the terms within and should be caveated.	Drafting changes to aid clarity and consistency. Caveats added.	To respond to stakeholder views.
Request for clarity on what 'a small site that may not normally be used for housing'.	Amended drafting - text now aligns with Housing policy and other parts of NPF4.	To respond to stakeholder views.
31 (d) viability, sustainability and diversity of the local economy		
Further types of diversification development were suggested to be included.	Added woodland crofts to development types. Key policy connections section added.	To respond to stakeholder views. All suggestions were considered however some were already considered to be covered by wider NPF4 policies.
Clarification of the meaning of 'good quality land'.	Amended wording.	To respond to stakeholder views.
Critical infrastructure should be expanded to include catchment management and flood risk	Re-structured policy and the split between Development and Homes	To respond to stakeholder views and help with document flow.

Issue	Change	Reason/Comments
management. There were also requests to emphasise the importance of transmission infrastructure and to include housing as critical infrastructure.	addresses some of the issues raised. Glossary definition added.	
31 (e) new homes in rural areas outwith existing rural settlements		
Mixture of responses demonstrating conflicting views with regards to this policy being too conditional and limiting to make a significant impact on rural populations, or alternatively that the criteria could be more prescriptive in parts.	Split the policy into two parts and adjusted layout & drafting.	To help with document flow. Changes are considered to address both sides of the concerns raised.
Clarification of what a redundant or disused building is was sought, while the implication of the text as drafted that the reuse of redundant or disused buildings in accessible or pressured areas would not be supported was queried, since this could be the most sustainable use of such buildings.	Removed text to consolidate the intent of the policy and simplify – also re-aligns policy with housing aspects to ensure no contradictions.	To provide clarity and respond to stakeholder views. No definition has been provided for the term redundant, it is considered that this term is universally understood and used within other policy without the need for a national definition. Any nationally defined criteria would risk overlooking specific local considerations.
31 (f) accessible or pressured rural areas		
Accessible or pressured rural areas – concerns that this is not realistic, concerns over terminology of pressured areas and lack of detail provided with regards to PA determination.	Rationalisation of terms to avoid confusion and improve clarity.	To respond to stakeholder views.
31 (g) remote rural areas		
Definition of 'remote rural areas' requested.	Clarification added to the LDP text to specify which classification should be used to define a remote rural area.	To provide clarity in response to stakeholder views.
31 (h) prime agricultural land		

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Draft Policy 31: Rural places

Issue	Change	Reason/Comments
General points on (h) included that this section could be moved to Policy 33 (Soils) or that prime agricultural land should be a standalone policy.	Moved section to sit under Revised NPF4 Policy 5(b) 'Soils' as prime agricultural land is not just present in rural areas.	To help with document structure and respond to stakeholder views.
Queries as to the definitions of land of lesser quality and prime agricultural land.	Definitions added to Glossary.	To provide clarity in response to stakeholder views.

Policy 32: Natural places

Summary of representations

Respondents were relatively evenly divided between those who broadly supported the policy and those who sought extensive changes. There were calls for a greater focus on protecting all biodiversity, following the mitigation hierarchy and stronger, plan-led action. With respect to the relationship between Policy 32 and other parts of NPF4, comments included that the fit with Policy 3 (Nature crisis) is unclear and that there are significant inconsistencies with Policy 19 (Green energy). There were also calls for linkages to be made between this policy and the Biodiversity Strategy.

Overview of changes

This is Revised NPF4 Policy 4 ‘Natural places’. This policy has been moved to sit alongside the policy on biodiversity. The policy on local nature conservation sites and local landscape areas has been reworded to provide clearer tests and the precautionary principle has been linked with relevant legislation and Scottish Government guidance. The policy on wild land has been revised to expressly support development that assists in meeting renewable energy targets, together with small scale development, subject to an impact assessment and appropriate mitigation, management measures and monitoring. The appropriate approach to buffer zones and development outwith wild land areas has also been clarified.

Issues raised and changes made

Issue	Change	Reason/Comments
Relationship between policy 32 and policy 3 (Nature Crisis) is unclear.	Moved policy content to earlier in NPF4 document to strengthen relationship with Revised Draft Policy 1: Tackling the climate and nature crises.	To respond to stakeholder views.
Further detail on the ‘best use’ of nature-based solutions, including how these will be planned and targeted, and work alongside other land priorities, avoiding unintended outcomes. Development proposals should also consider the risk to carbon stocks held in the soils and vegetation of natural habitats and look to protect and enhance these.	Added Glossary definition of “nature-based solutions”.	To respond to UK Climate Change Committee. Detail on specific nature-based solutions beyond the existing content/new Glossary definition would not be appropriate for NPF4. Planning authorities can interpret the principles and determine what tailored solutions may be appropriate/beneficial within their area. Impacts of development proposals on carbon stocks held in soils and other carbon stores (such

PART 3 – National Planning Policy
Draft Policy 32: Natural places

Issue	Change	Reason/Comments
		as woodland) are dealt with under the Revised Draft NPF4 Policies: 5 'Soils' and 6 'Forestry, woodlands and trees', which underpin the overarching policy of tackling the twin crises.
Greater focus on biodiversity, not just designated sites.	No change.	The Revised Draft NPF4 Policy 4 'Natural places' is one aspect of the overarching policy to tackle the twin crises. Biodiversity is a cross-cutting theme that runs through NPF4 as a whole, including, but not limited to, the Natural Places policy.
Greater emphasis on following the mitigation hierarchy.	Added policy intent and outcomes to emphasise that this policy is focused primarily on the protection of important natural assets in the first instance. Illustration of mitigation hierarchy added to Glossary.	To respond to Committee (NZET) and stakeholder views.
This policy should link to the Scottish Biodiversity Strategy.	No change.	It is not necessary for NPF4 to reference the Scottish Biodiversity Strategy within policy text. The Natural Places policy is one aspect of the overarching policy to tackle the twin crises. Biodiversity is a cross-cutting theme that runs through NPF4 as a whole, including, but not limited to, the Natural Places policy.
Natural heritage sites such as St Kilda would be better covered under Policy 32.	No change.	Reference to World Heritage Sites sits within Revised NPF4 Policy 7 'Historic assets and places'. Natural places policy will apply in relevant circumstances and NPF should be read as a whole.

Issue	Change	Reason/Comments
32 (a) LDPs should identify and protect natural assets and areas		
Further guidance will be required to identify assets, landscapes, species and habitats referenced. LDPs may not be the most appropriate vehicle to identify all of these at this level of detail.	Amended the first sentence of the LDP text to clarify that spatial strategies will identify and protect locally, regionally, nationally and internationally important natural assets. Wording amended to add clarity.	To respond to stakeholder views.
The word “valued” is ambiguous.	Changed “valued” to “important”.	To respond to stakeholder views.
LDPs should also provide further detail on local nature networks, including a requirement to identify and protect areas contributing to a nature network, set out core components of a nature network and provide guidance on development of such networks.	Text added to provide further detail and clarity to the ‘Nature Networks’ Glossary definition.	To respond to stakeholder views. LDPs are one possible delivery mechanism for nature networks. Opportunities for implementation may be identified through, e.g. LDPs and/or Local Biodiversity Action Plans and/or other existing or new mechanisms such as those developed under the Scottish Biodiversity Strategy Delivery Plan, to achieve connectivity within and across urban, peri-urban and rural landscapes.
Greater guidance for local authorities about what sort of projects would best contribute to Nature Networks, where the best sites are to begin from, and how to deliver cross-boundary Nature Network projects	Added text to the ‘Nature Networks’ Glossary definition.	To respond to Committee (RAINE) and stakeholder views. To add further detail and clarity. LDPs are one possible delivery mechanism for nature networks. Opportunities for implementation may be identified through, e.g. LDPs and/or Local Biodiversity Action Plans and/or other existing or new mechanisms such as those developed under the Scottish Biodiversity

Issue	Change	Reason/Comments
		Strategy Delivery Plan, to achieve connectivity within and across urban, peri-urban and rural landscapes.
32 (b) unacceptable impact on natural environment		
Uncertainty around meaning of “biodiversity objectives” in this context.	Removed reference to “biodiversity objectives”.	To respond to stakeholder views. Specific reference to biodiversity objectives is not necessary in this section. This statement is referring to impacts on all aspects of the natural environment.
Definition of “unacceptable impact”.	Added text to this section to add clarity that it is the type, location or scale of development which may have an unacceptable impact on the natural environment.	To respond to stakeholder views.
32 (c) effect on a European site		
Further clarity on how development affecting European sites will be considered.	Amended wording to add clarity that this is a statutory process.	To respond to stakeholder views.
32 (d) NP, NSA, SSSI or NNR		
Reference to National Park legislation unnecessary.	Removed reference to National Parks (Scotland) Act 2000.	Responding to stakeholder views and removing unnecessary wording.
Lacks ambition and language should be strengthened.	‘should’ changed to ‘will’ to provide enhanced strength of language with regards to the level of protection given to such designations.	To provide clarity of message and respond to stakeholder views.
‘Significant Adverse Effects’ should be explained further.	No change.	‘Significant adverse effects’ in relation to national designations is a well-known and well accepted term which has been carried forward from Scottish Planning Policy (2014).
32 (e) protected species		
What species are covered by “protected species”.	Amended wording to make clear that this section is referring to all species protected by legislation.	To provide clarity of message and respond to stakeholder views.

Issue	Change	Reason/Comments
	'Reasonable' added to precede evidence.	
32 (f) non-native species		
This is covered by law, not required in NPF4.	Removed section.	To respond to stakeholder views and remove unnecessary wording.
32 (g) Local Nature Conservation Site or Local Landscape Area		
As drafted, appears to favour development on local nature conservation sites.	Amended language to be clearer that this is not a presumption in favour of development on local nature conservation sites.	To respond to stakeholder views and provide clarification of intent.
32 (h) precautionary principle		
Greater clarity required for this section and link to Guiding Principles on the Environment: draft statutory guidance.	Amended wording to link to relevant legislation and Scottish Government Guidance on this matter.	To respond to stakeholder views.
32 (i) wild land		
Two opposing views on this section. One side seeking greater protection for Wild Land areas and other seeking relaxation for certain development types (renewables and local housing/sustainable development). Conflict between this policy and Policy 19: Green Energy raised.	Amended wording to remove sequential test that development 'cannot be reasonably located outside of the wild land area' and amended to provide for development that supports meeting renewable energy targets (as well as small scale rural developments). States that buffer zones around wild land will not be applied and effects of development outwith wild land areas will not be a significant consideration.	To respond to stakeholder views. A more explicit policy position has been provided taking into account views received.

Policy 33: Soils

Summary of representations

There was broad support for this policy, although some thought it should go further in protecting peatlands. It was suggested that it should be strengthened in terms of peatland restoration and that a proactive approach to restoration should be adopted. In terms of development on peatland, some argued that, as drafted, there are too many exceptions or too much leeway for developers. Other respondents welcomed the absence of a blanket ban on development.

Overview of changes

This is Revised NPF4 Policy 5 'Soils'. This policy has been updated, including to make specific reference to the exception given to the whisky industry. Amended text also includes new, more explicit provision on restoration and enhancement where development takes place on peatland. Protection for prime agricultural land has been moved to this policy, and the policy as a whole has been moved to 'sustainable places'.

Issues raised and changes made

Issue	Change	Reason/Comments
Welcome the discussion of peatlands and soil health as part of nature-based solutions. Would like more direct consideration of climate adaptation for and climate risks to peatlands and soils.	No change.	UK Climate Change Committee Request. Noted and consider encompassed under Revised NPF4 new policy 2 'Climate mitigation and adaptation'.
Detail is required to set out what would be considered 'essential' in this context. Alongside consideration of disturbance, degradation or erosion of the peat soils, consideration should also be given to the impact on the hydrological footprint of the peat body, which may extend beyond the peat boundary.	New definition in Glossary of 'essential infrastructure' in addition to the other four development proposals listed. Consideration of impacts on soils as referred to in the issue section would be covered by Revised NPF4 Policy 5 'Soils' new part (d) requirements for assessment.	To respond to UK Climate Change Committee.
Stronger terms are required regarding the restriction of peat extraction, with this practice stopped outright and steps taken to restore	No change.	To respond to Committee (NZET and UK Climate Change) views. New development proposals for commercial peat extraction and

Issue	Change	Reason/Comments
all extraction sites by 2035 (in line with previous CCC advice).		extensions to existing developments will fall within the scope of NPF4. Wider actions, outwith the scope of NPF4 include, a pledge in our 2021-22 Programme for Government to take forward work to develop and consult on a ban on the sale of peat related gardening products as part of our wider commitment to phase out the use of peat in horticulture and a 10 year programme of peatland restoration that is already underway.
Cross references required to related policies.	Added key policy connections.	To respond to stakeholder views.
Greater emphasis on full range of soil types that offer carbon and other ecologically important services.	New policy intent and outcomes establish policy focus on all soil types. Additionally LDP subsection and part a) provide specific reference to protecting valued soils.	To respond to stakeholder views.
Strengthen policy to support peatland restoration.	New part d) establishes need to consider requirements for restoring and/or enhancing peatland systems.	To respond to stakeholder views.
Reference of archaeological value of peat and carbon rich soils.	No change.	Revised Draft NPF4 Policy 7 'Historic assets and places' sets out requirements for the consideration of buried archaeological remains. NPF4 is to be read as a whole.
33 (a) <i>locally, regionally, nationally and internationally valued soils</i>		
Calls to define valued soils.	No change.	The value assigned to soils can be established via reference to the protected area network and other existing mapped data sources. Detail on these

Issue	Change	Reason/Comments
		information sources will be included in LDP guidance.
Refer to all soils as all soils have value.	New policy intent and outcomes establish policy focus on all soil types. Additionally LDP subsection and part a) provide specific reference to protecting valued soils.	To respond to stakeholder views.
33 (b) disturbance of soils		
Greater clarity sought.	Part (b) replaced with Revised NPF4 Policy 5 'Soils' new part (a), setting out need to follow mitigation hierarchy and the types of impacts to be taken into account.	To respond to Committee (NZET) and stakeholder views.
33 (c) peatland, carbon rich soils and priority peatland habitat		
Degree to which the policy protects carbon-rich soils.	Part (c) updated in Revised Draft NPF4 policy 5 'Soils' with list of development types that could be supported. With part (d) of Revised Draft NPF4 policy 5 'Soils' establishing the design and assessment requirements that offer protection of carbon-rich soils. Plus clarity provided on the definition of peatland, priority peatland habitat and carbon-rich soils.	To respond to stakeholder views.
Definition of essential infrastructure.	Updated definition provided in Glossary.	To respond to stakeholder views.
Recognise peatland restoration opportunity in development proposals.	Revised Draft NPF4 policy 5 'Soils' new part (d) refers to plans that may be required for restoration and enhancement.	To respond to stakeholder views.
Methods and approach to assessment.	Revised Draft NPF4 policy 5 'Soils' new part (d) offers clarity on approach to assessment and key items of consideration.	To respond to stakeholder views. Policy wording allows for application of best practice and most up-to-date tools for assessment. Work is underway to update or replace the

Issue	Change	Reason/Comments
		carbon calculator. Scottish Government will ensure that we develop adequate tools and guidance to help assess the net carbon impacts of development proposals on peatlands and other carbon-rich soils.
33 (d) new commercial peat extraction		
Clarification around the exception criteria for commercial peat extraction.	Amended to specify whisky industry rather than ‘an industry of national importance’ and tightened wording to ensure clarity.	To respond to Committee (NZET) and stakeholder views.
Concern that there should be no commercial peat extraction and no exemptions, or expressed concerns at the number of exemptions proposed.	The criteria has been reworded to ensure it will only apply to an extremely limited number of development proposal and too ensure the potential impact on the peatland itself is kept to minimum.	To respond to stakeholder views.
General points included that the Rural Places Policy 31(h) could be moved to Policy 33 (Soils) or that Prime agricultural land should be a standalone policy.	Policy moved to Revised NPF4 Policy 5(b) ‘Soils’.	To respond to stakeholder views.

Policy 34: Trees, woodland and forestry

Summary of representations

General comments included that the acknowledgement of the importance of trees and woodland in meeting climate targets and reversing biodiversity loss is welcome. It was also suggested that the protections provided could be strengthened further, and the importance of preserving native woodland was emphasised. An alternative perspective was that proposed protections go too far in protecting woodland at the expense of development needed to deliver net zero.

Overview of changes

This is Revised NPF4 Policy 6 'Forestry, woodland and trees'. This policy has had minor changes to the wording including a clearer requirement, rather than suggestion, that woodland should be protected, responding to a petition. This has also been moved to 'Sustainable Places'.

Issues raised and changes made

Issue	Change	Reason/Comments
Call for greater ambition and more detail on how the planning system can proactively enhance and expand woodland cover.	Amended wording/ structure to include a statement that supports development proposals that enhance, expand and improve woodland and tree cover at the start of policy text.	To respond to UK Climate Change Committee.
Policy should give greater emphasis to individual/small groups of trees.	Clearer references to 'trees' added through policy intent, policy outcomes and within the LDP text.	To respond to stakeholder views.
Small loss of trees in woodlands should be allowed for food production.	No change.	The removal of woodland is covered by the Control of Woodland Removal policy. It would not be appropriate for NPF4 to detail types of removal which may or may not be acceptable. The Control of Woodland Removal policy is interpreted and applied by Consenting Authorities as appropriate within their area and on a case by case basis.
Reference to Tree Preservation Orders	No change.	Tree Preservation Orders (TPOs) are made following

PART 3 – National Planning Policy
Draft Policy 34: Trees, woodland and forestry

Issue	Change	Reason/Comments
(TPOs) should be within policy.		accordance with procedures set out in legislation. It is not necessary for NPF4 to reference these procedures.
Greater clarity around terminology.	Added Glossary terms for 'woodlands', 'veteran trees', 'ancient woodlands', and 'public benefits'.	To provide clarity and respond to stakeholder views.
34 (a) LDPs identify and protect existing woodland and potential for its enhancement or expansion		
Reference to 'The Right Tree in the Right Place' and discussion of this document being updated/re-named.	Removed reference to 'The Right Tree in the Right Place'.	Clarity of message. It is not necessary for NPF4 to reference 'The Right Tree in the Right Place'. This document remains a Scottish Government adopted Guidance document which offers advice to planning authorities on planning for forestry and woodlands.
Confusion surrounding LDP text and requirements around Forestry and Woodland strategies.	Amended wording to be clearer and simpler.	To provide clarity and respond to stakeholder views.
34 (b) ancient woodlands, native woodlands, woodland habitats		
Support for policy wording but calls for strengthened protection, particularly for ancient/native woodlands.	Changed 'should' to 'will' to provide strengthened language and greater clarity surrounding the level of policy protection that will be afforded to these vital and often irreplaceable habitats A Glossary definition has been provided for 'Ancient Woodlands' which refers to 'land' that has maintained continuous woodland habitat, not just the woodland itself.	To provide clarity and respond to stakeholder views.
Proposals are too restrictive, particularly around protection for ancient/native woodlands and do not allow for	No change.	The policy wording is proportionate and representative of the importance these often

PART 3 – National Planning Policy
Draft Policy 34: Trees, woodland and forestry

Issue	Change	Reason/Comments
development needed to deliver net zero or the possibility of minor impacts.		irreplaceable habitats have. The Control of Woodland Removal Policy remains the Scottish Government's currently adopted policy document which provides policy direction for decisions on woodland removal in Scotland, including renewables.
Reference to the mitigation hierarchy should be added to the 'Fragmenting or severing woodland habitats' section.	Amended wording to make clear that mitigation will be appropriate and in line with the mitigation hierarchy.	To provide clarity and respond to stakeholder views.
Consideration should also be given to other matters such as the quality of the land.	Glossary definition has been provided for 'Ancient Woodlands' which refers to the 'land' that has maintained continuous woodland habitat, not just the woodland itself.	To respond to stakeholder views and clarity of message.
'Adverse impacts' should be defined.	No change.	Adverse impacts in relation to woodlands is a well-known and well accepted term which has been carried forward from Scottish Planning Policy (2014).
34 (c) woodland removal		
Addresses woodland removal and compensatory planting at only a high level. Further detail should be set out.	No change.	To respond to Committee (NZET and UK Climate Change) request. Woodland removal and compensatory planting is fully detailed within the Scottish Government's Control of Woodland Removal Policy.
The requirement to provide compensatory planting should be compulsory.	No change.	The removal of woodland is covered by the Control of Woodland Removal policy. The Control of Woodland Removal policy is interpreted and applied by Consenting Authorities as appropriate within their

PART 3 – National Planning Policy
Draft Policy 34: Trees, woodland and forestry

Issue	Change	Reason/Comments
		area and on a case by case basis.
Reference to the Control of Woodland Removal Policy should be made within the policy text.	Added to policy text “in accordance with relevant Scottish Government policy on woodland removal”. Glossary term added for “public benefits”.	To respond to stakeholder views. The Control of Woodland Removal Policy remains the Scottish Government’s currently adopted policy document which provides policy direction for decisions on woodland removal in Scotland.
34 (d) existing woodland or land identified as suitable for woodland creation		
All developments should have to integrate new woodlands into their design. Not just those that include areas identified as being suitable for woodland under Forest and Woodland strategies.	No change.	This section reinforces the policy link to LDPs and the requirement for spatial strategies to identify and set out proposals for forestry, woodlands and trees in their area. This will be informed by an up to date Forestry and Woodland Strategy.
Should be strengthened and also specify that development must ensure that existing woodland is protected from direct and indirect adverse impacts.	Strengthened language to move from ‘opportunities should be considered’ to development proposals on sites which include existing woodland (or land identified as being suitable for woodland creation only being supported where both ‘enhancement’ and ‘improvement’ of woodlands is integrated into the design.	To respond to Committee (NZET).
34 (e) sustainably managed woodland		
This statement should make clear that support is subject to complying with other policies.	No change.	It is not necessary for this section to reference compliance with other NPF4 policies. NPF4 should be read as a whole and all relevant policies should be considered and applied. Details of key policy connections have been added within NPF4.

Policy 35: Coasts

Summary of representations

Respondents tended to support the policy, although there were concerns that the emphasis is on the immediate and short-term climate change risks at the coast. Respondents were looking for more of a focus on protecting the marine environment, restoring blue carbon habitats as a nature-based solution and on creating and supporting sustainable coastal communities.

Overview of changes

This is Revised NPF4 Policy 10 'Coastal development'. This policy has been updated to give more clarity on the level of support for development on developed and undeveloped coasts. It has been moved to the section on sustainable places.

Issues raised and changes made

Issue	Change	Reason/Comments
Calls for greater clarity.	Changed policy name to add clarity, as 'Coastal Development' thought more specific than 'coasts'. Small amendments made to the wording throughout to ensure clarity of message and consistency with other policy areas.	To respond to stakeholder views and provide clarity of message.
Concerns that the emphasis is on the immediate and short-term climate change risks at the coast.	Amended wording to ensure clarity over developments being supportable in the long term and to take into account projected climate change.	To provide clarity in response to stakeholder views.
Need to build in resilience for the medium term in terms of adaptation, but also a need to be thinking about the longer term.	Drafting changes made to make clear the policy intent is to protect coastal communities and assets and support resilience to the impacts of climate change.	To respond to Committee (NZET) and stakeholder views.
Scope - many suggestions were provided for this policy to widen its scope and include a range of other subjects, such as the landscape and recreation value of the coasts, further focus on protecting the	Added 'key policy connections', including: 'Biodiversity'; 'Energy'; 'Play, recreation and sport'.	NPF4 is intended to be read as a whole, and therefore this policy will apply alongside other policies. The change of policy name may also aid clarity.

Issue	Change	Reason/Comments
marine environment, restoring blue carbon habitats, access and connectivity challenges, supporting coastal communities, historic environment assessments and renewable energy infrastructure.		
Calls for clearer links on how the policy relates to other policies relevant in coastal locations - such as Policy 31 (Rural places) Policy 8 (Infrastructure first) and Policy 19 (Green energy).	Added 'Key Policy Connections'.	To ensure clear links with other key relevant policies within NPF4. NPF4 should be read as a whole, and therefore this policy will apply alongside other policies.
Call for reference to other relevant plans.	No change within policy.	Wider plans and strategies referenced in overview of themes and in new Table 1 schematic.
Call for consideration to be given to the significant carbon stores held in coastal habitats, and clear steps taken to identify and protect these from disturbance and loss by development.	Reworded policy to highlight use of nature-based solutions to support resilience against the impacts of climate change – which includes carbon stores.	To respond to UK Climate Change Committee.
35 (a) consider how to adapt coastlines to the impacts of climate change		
It was thought unclear if LDP spatial strategies are required to identify developed and undeveloped coast. Others asked for a definition of 'undeveloped coastal areas' and for a clear distinction to be made between undeveloped coastal areas and settlements that are located in coastal areas.	Changed text on LDPs to reflect that we expect the spatial strategies to identify areas of developed and undeveloped coast within their plan.	To respond to stakeholder views. It is appropriate to allow local areas to identify as appropriate, making a clear distinction between settlement boundaries and coastal areas, while it was thought that an attempt to define this at a national level, without further stakeholder engagement or discussion, could be overly prescriptive.
35 (b) development proposals that require a coastal location		
It was suggested that greater clarity is needed as to what 'requires' a coastal location and whether	Amended wording where appropriate to reflect feedback.	To provide clarity of message and respond to stakeholder views.

Issue	Change	Reason/Comments
<p>developers should have to demonstrate that a coastal location is required. Others expressed concerns that the policy was too restrictive and should be amended to enable certain development where it is considered necessary or essential.</p>	<p>Changes made to ensure essential infrastructure is supported where appropriate.</p>	
<p>35 (c) undeveloped coastal areas</p>		
<p>It was suggested that the policy should recognise that undeveloped coastal areas will rarely be an appropriate location for new development, and that there should be a stronger presumption against development in such areas.</p>	<p>Amended drafting to add clarity to the message and more appropriately set out the intentions to restrict new development in these areas.</p>	<p>To provide clarity in response to stakeholder views.</p>
<p>35 (d) coastal defence measures</p>		
<p>Local Flood Risk Management Strategies and Plans should be included in the list of documents with which a proposal should be consistent.</p>	<p>No change.</p>	<p>The text refers to ‘relevant coastal or marine plans’ which would include Local Flood Risk Management Strategies.</p>
<p>Request to make clear whether all of the bullet points need to be satisfied.</p>	<p>Inserted ‘and’ to clarify</p>	<p>To provide clarity and respond to stakeholder views.</p>
<p>35 (e) long term coastal vulnerability and resilience</p>		
<p>Referred to a lack of clarity, with the terms ‘may impact on the coast’, ‘appropriate issues’ and ‘long term vulnerability’ all thought too vague.</p>	<p>Removed wording to reduce confusion and text re-drafted to clarify intent of policy and provide further direction to decision makers.</p>	<p>To provide clarity in response to stakeholder views.</p>

Part 4 – Delivering Our Spatial Strategy

Summary of representations

A number of respondents commented that a delivery plan would have been helpful to support the Draft NPF4. The importance of the delivery strategy was highlighted, including to provide confidence to all sectors involved in the built environment and to demonstrate that the relevant actions, mechanisms, and responsibilities are clear.

It was agreed that a collaborative approach that aligns interests will play a central role in delivering the spatial strategy. It was described as a crucial aspect of how a radical and ambitious strategy can be effectively delivered by the practitioners tasked with management and delivery.

There was broad agreement that monitoring will be an essential part of the NPF process, and also that it will be a significant and challenging undertaking. In terms of overall responsibilities, it was suggested that monitoring of NPF4 should be led and undertaken by the Scottish Government as the coordinating authority.

Overview of approach

A delivery programme has been published alongside the Revised Draft, which sets out how the priorities in NPF4 align with wider investment programmes. This will be a live document, to be updated as delivery progresses, supported by governance arrangements.

Issues raised and changes made

Issue	Change	Reason/Comments
Part 4 is short on detail and does not give confidence moving forward with delivering NPF4. Delivery plan required and clarity on SG role in delivery.	Detail on delivery actions/role of SG are set out in the Delivery Programme, published alongside the revised NPF4.	To respond to stakeholder views.
Further detail sought on delivery of National Developments.	Reference to delivery of NDs is set out in Delivery Programme.	To respond to stakeholder views.
Clarity on where funds exist and how they align with NPF4. Detail required on aligning resources and plans, programmes and strategies (e.g. IIP/ STPR2).	Reference to NPF4 funding and aligning resources is set out in the Delivery Programme.	To respond to Committee (LGHP) and stakeholder views.
Financing and delivering a net-zero Scotland.	Reference to NPF4 funding and aligning	To respond to Committee (NZET).

PART 4 – Delivering Our Spatial Strategy

Issue	Change	Reason/Comments
	resources is set out in the Delivery Programme.	The delivery of NPF4 policy (which supports the transition to net zero) is supported by a Delivery Programme which includes a set of actions to progress co-ordination and alignment or funding/resources.
NPF4 needs to set out or be accompanied by a clear Capital and Revenue Investment Programme.	Reference to the relationship of NPF4 within broader SG prioritisation and capital spending plans is set out in the Delivery Programme.	To respond to Committee (LGHP) and stakeholder views.
Clarity on a financial strategy for front funding and cost recovery, use of Infrastructure Levy and link to planning obligations.	The Delivery Programme contains detail on the funding position for NPF4. Infrastructure Levy and review of developer contributions are part of the wider planning reform work programme.	To respond to stakeholder views.
Need leadership from Scottish Government for national agencies to work with planning authorities.	Expectations around (and need for) collaborative working are set out in Delivery Programme.	To respond to stakeholder views.
Call for a new national infrastructure company/ delivery agency to be established.	No change.	Out with scope of NPF4.
Respondents sought opportunity to be involved in Delivery Programme.	The Delivery Programme sets out the governance arrangements for NPF4 which includes engagement.	To respond to stakeholder views.
There is a need to maximise the opportunities presented through the digital planning programme.	The Actions Table in the Delivery Programme sets out the key actions to be progressed to support the delivery of NPF4.	To respond to stakeholder views.
Clarity on how the Digital Planning Strategy will support the implementation of NPF4.	Details of the digital transformation programme are set out in Delivery Programme.	To respond to stakeholder views.
How land value capture will interact with NPF4 and role of proactive land assembly.	No change.	Part of wider planning reform work programme.

PART 4 – Delivering Our Spatial Strategy

Issue	Change	Reason/Comments
NPF4 to state that growth deals should reflect spatial strategies.	Reference to City Region and Regional Growth deals in Delivery Programme.	To respond to stakeholder views.
NPF4 should address the importance of healthcare-related infrastructure.	Revised NPF4 Policy 18 'Infrastructure First' relates to infrastructure planning, which includes healthcare. See Glossary.	To respond to stakeholder views.
Lack of clarity around the relationship between NPF4 and Regional Spatial Strategies.	Revised NPF4 new Annex A 'How to Use this Document' covers relationship between plans.	To respond to stakeholder views.
How the various components of the LDP would interact with the content of NPF4.		
Need to highlight the importance of Local Place Plans and the need for engagement with older people.		
How NPF4 will be introduced to the planning system and how it will interact with live planning applications.	Revised NPF4 new Annex A 'How to Use this Document' covers interaction with planning applications.	To respond to stakeholder views. We will also commence the appropriate section(s) of the 2019 Act which makes NPF4 part of the statutory development plan
How the issue of resourcing of planning departments will be addressed.	Details relating to skills and resourcing of the system are in the Delivery Programme.	To respond to stakeholder views.
A comprehensive resource and skills strategy is needed to be published as part of the delivery programme.	The approach to skills/resourcing is outlined in Delivery Programme.	To respond to stakeholder views.
Monitoring of NPF4 should be led by the Scottish Government and engagement and consultation sought on the development of a monitoring system.	Initial actions for monitoring and evaluation are set out in Delivery Programme.	To respond to stakeholder views.
Data - planners need to have access to reliable spatial data, references were made to particular	Details on how the Digital Planning Transformation Programme will support the National Planning	To respond to Committee (NZET)

PART 4 – Delivering Our Spatial Strategy

Issue	Change	Reason/Comments
types of data including on woodlands.	Framework are set out in the Delivery Programme.	

Part 5 – Annexes

Annex A – NPF4 Outcomes Statement

Summary of representations

Some of these expressed their support for the overall policy direction and development measures set out by the Draft NPF4, and agreed that these will contribute to the delivery of statutory outcomes. However, most of those commenting raised issues or suggested amendments to better support delivery of such outcomes.

This included views that the policies set out in the Draft NPF4 will not result in a significant change in the character of development in Scotland, and specific concerns that it does not give sufficient weight to climate change and biodiversity. Stronger emphasis on the delivery of sustainable development was requested. While there was support for what was described as a positive policy framework, respondents suggested that the policies set out in the document are open to interpretation, and do not include sufficient detail to ensure effective delivery.

There were also calls for this part of NPF4 to be expanded to include other relevant outcomes and targets. Specific suggestions included reference to relevant UN Sustainable Development Goals and their targets, National Performance Framework outcomes, and other duties under the Town and Country Planning (Scotland) Act 1997.

It was also suggested that the delivery of statutory outcomes should be integrated with other NPF4 components, such as the four spatial strategy themes (Sustainable places, Liveable places, Productive places, and Distinctive places) and the six spatial principles for Scotland 2045. This reflected concern around a perceived lack of integration across other parts of NPF4, such as between the Action Area regional priorities and National Developments. Some respondents wished to see the outcomes section expanded to map the relationship between all components, and how these address delivery of the statutory outcomes.

Respondents also reiterated concerns raised at earlier questions that delivery against the statutory outcomes will require significant resources and investment. This included concern around the required resourcing of the planning system (with reference to Heads of Planning Scotland's estimate that 700 additional planners will be required over the next 15 years), and investment in infrastructure. There was also reference to the need for coordinated action across a range of stakeholders to ensure delivery of NPF4's ambitions, and a view that more work is required to provide clarity on the role of various stakeholders. Overall, it was suggested that there is a delivery gap between ambitions and policies, and realisation of the statutory outcomes.

Detailed comments were provided about each of the six outcomes as set out the Analysis Report.

Overview of changes

The outcomes section within the Draft sat in an Annex, outcomes have been moved upfront within the document and are now clearly profiled within Part 1 the national spatial strategy, with explicit links to show which policies will help deliver each of the outcomes. There are now six clear sections on each of the outcomes prescribed in the Act

- Reducing Greenhouse Gas Emissions - to meet greenhouse gas emissions targets.
- Improving Biodiversity - to secure positive effects for biodiversity.
- A Fair And Inclusive Planning System – that helps to eliminate discrimination and promote equality.
- Homes That Meet Our Diverse Needs - in particular, the housing needs for older people and disabled people.
- Rural Revitalisation – to help increase the population of rural areas of Scotland.
- Lifelong Health And Wellbeing - to improve health and wellbeing

Issues raised and changes made

Issue	Change	Reason/Comments
Concerns that NPF4 does not give sufficient weight to climate change and biodiversity. Stronger emphasis on the delivery of sustainable development was requested.	Enhanced sections on the outcomes including those on Reducing Greenhouse Gas Emissions and Improving Biodiversity. Revised NPF4 Policy 1 'Tackling the climate and nature crises' amended to clarify that significant weight is to be given to the climate emergency and nature crises.	To respond to stakeholder views and provide clarity of message to deliver the outcomes. The nature crisis, together with the global climate emergency, underpins the spatial strategy as a whole.
Add details of other relevant outcomes relevant UN Sustainable Development Goals (UNSDG) and their targets, National Performance Framework outcomes, and other duties under the Town and Country Planning (Scotland) Act 1997.	Added new Table 1 schematic which shows the connections of each of the national outcomes to the UNSDGs and how it fits with the wider policies and themes. The introduction to each theme also ties in the relevant UNSDG and national outcomes.	To respond to stakeholder views.
Calls for integration with other NPF4 components, such as the spatial strategy themes.	Moved the outcomes upfront to be profiled within the Spatial Strategy.	To respond to stakeholder views, giving greater prominence to the outcomes.
Call for the outcomes section to be expanded to	Expanded sections on each of the statutory	To respond to stakeholder views and provide clarity of

PART 5 – Annexes
Annex A - NPF4 Outcomes Statement

Issue	Change	Reason/Comments
map the relationship between all components, and how these address delivery of the statutory outcomes.	outcomes – which refers to the policies, and spatial principles, and proposals within the action areas that contribute to the outcomes.	message to deliver the outcomes.
Seeking amendments and further detail to support effective delivery of the outcomes.	Revised sections on Outcomes have closer links to the policies to support delivery of the outcomes through the policy framework.	To respond to stakeholder views.
Seeking commitment to an annual evaluation of NPF4 against outcomes set in the Town and Country Planning (Scotland) Act, 1997.	No change.	LGHP Committee request. Not for NPF4 content. We are committed to working with stakeholders including the High Level Group on Performance.
Consider how benchmarking in local government could be used to ensure that the ambitions of NPF4 can be delivered.	No change.	LGHP Committee request. Not for NPF4 content.
Need for resources to deliver on the outcomes.	No change.	Not for NPF4 content. The relationship between NPF4 and broader SG prioritisation and capital spending plans is in the Delivery Programme. It also includes details on Skills & Resources.
Need for coordinated action across a range of stakeholders to ensure delivery of NPF4's ambitions. Call for clarity to be provided on the role of various stakeholders.	No change.	Not for NPF4 content. Expectations around (and need for) collaborative working are set out in Delivery Programme.

Annex B – Housing Numbers

Summary of representations

Aspects that respondents liked included how the Scottish Government took an inclusive approach to arriving at MATHLR numbers with Local Authorities being consulted during the process, with most Local Authorities agreeing with the MATHLR figures set out. A different perspective was that there was a lack of input from some Local Authorities during the preparation of the MATHLR figures, while there were concerns that the MATHLR was not aligned to Housing 2040.

A number of respondents noted a lack of ambition in the MATHLR figures, with alternative MATHLR figures suggested for some Local Authorities. There were concerns raised regarding the methodology and the HNSA tool used to inform the MATHLR figures. There were some respondents who considered the approach to the MATHLR has artificially inflated housing figures and has not taken into account population declines.

Issues raised and changes made

Issue	Change	Reason/Comments
Differing views of MATHLR figures being too high and too low.	MATHLR figures have been updated where new HNSA information was available as shown in Figure 5 below.	To ensure figures are based on up-to-date evidence. MATHLR is evidence based, transparent and reasonable: it is a minimum to prevent it being interpreted as a cap - it is expected to be exceeded where evidence justifies.
Lack of ambition in MATHLR.	Policy strengthened to 'expected to exceed'.	To respond to Committee (LGHP) and stakeholder views. LGHP wrote to all local authorities in February 2022 regarding the MATHLR and their locally adjusted estimates. The majority of the 18 responses noted that their locally adjusted estimates increased the MATHLR from the initial default estimate supplied by the Scottish Government in February 2021. MATHLR is evidence based, transparent and

PART 5 – Annexes
Annex B - Housing Numbers

Issue	Change	Reason/Comments
		reasonable: it is a minimum to prevent it being interpreted as a cap - it is expected to be exceeded where evidence justifies.
Impact on affordability of homes where the level of homes is too low.	No change.	The affordability of homes relates to a range of complex factors in addition to housing land. These can include wider economic circumstances, e.g. interest rates, finance availability, cost and availability of materials and skilled labour, as well as individual business decisions, e.g. site programming and build out rates linked to local housing markets.
Suggestion to review HNDA tool.	No change.	LGHP Committee request. HNDA is a well-established and well-understood tool that uses best available data to provide a consistent approach. It informs both Local Housing Strategies and LDPs – and maintains the necessary shared evidence base between the planning and housing systems. The MATHLR uses the first two steps of the HNDA tool as a basis, which local authorities have then considered and adjusted using local knowledge and evidence, and informed by local stakeholders.
Alignment with Housing to 2040.	No change.	LGHP Committee request. Housing to 2040 and NPF4 are aligned around providing more, good quality homes at the heart of great places: Housing to 2040 indicated we would

Issue	Change	Reason/Comments
		make a substantial shift in our approach to planning for housing to achieve this.
Level of input from local authorities during preparation of the Draft MATHLR was not consistent.	No change	The statutory requirement for and approach to the MATHLR are new. It uses a consistent method, which included providing a consistent opportunity to all authorities to provide local adjustments to address local circumstances. It is expected that the HNDA process will be completed in full as part of the Evidence Report stage of the LDP preparation process and planning authorities will be able to use the outcome of the full HNDA to inform setting the Local Housing Land Requirement for the LDP, which is expected to exceed the NPF4 MATHLR figure. Meantime, we are content the MATHLR process provides a robust, evidence based approach to establishing the national requirement.
MATHLR methodology is not appropriate for low volume build, low populous areas.	No change.	The NPF figures are intended to be broad and reasonable. The MATHLR for Eilean Siar has not been rounded. This is because of the effect rounding to the nearest 50 can have on numbers at this scale. NPF4 expects that in rural and island areas, authorities are encouraged to set out tailored

Issue	Change	Reason/Comments
		approaches to housing, which reflect locally specific market circumstances and delivery approaches.
MATHLR process does not sufficiently recognise the role of regional and local housing markets, or how markets operate across boundaries.	No change.	Housing is an important cross local authority boundary consideration – the approach to the MATHLR provides for cross authority working where this is preferred – see the Housing Land Requirement Explanatory Report (November 2021), para 46.
MATHLR would be more appropriately established through regional partnership working and should remain a function of the Regional Spatial Strategies.	No change.	The Town and Country Planning (Scotland) Act 1997, as amended, requires at Section 3A(3)(d) that the National Planning Framework contain “targets for the use of land in different areas of Scotland for housing”. To meet this, Annex E of Revised NPF4 proposes a Minimum All-Tenure Housing Land Requirement (MATHLR) for each planning authority in Scotland.
Focusing on a minimum MATHLR may discourage ambition when it comes to identifying enough land to build the number of affordable homes the Scottish Government has committed to building in the next 10 years.	No change.	The figures are all-tenure as for national spatial planning purposes it is the scale of land that is required that is relevant. We expect tenure (market and affordable) to be considered at the local level through LDPs, which should consider the potential for all types of homes across all tenures, informed by Local Housing Strategies, and where appropriate make provision for these.

Issue	Change	Reason/Comments
		Affordable housing is not all delivered through new housing developments, Revised NPF4 Policy 16(f)(iii) 'Quality Homes' supports developments of less than 50 affordable homes as part of a local authority supported affordable housing plan, on unallocated land within LDPs.
The population data used for the MATHLR calculations needs to be up-to-date, rather than anticipating a continuation of recent trends. Current figures reflect the pre-Brexit and COVID situation.	No change.	The 2018-based household projections were the most up to date projections available at the time of producing the MATHLR. Authorities, as they prepare their next LDPs, will be able to consider whether more up to date information and evidence is available to inform whether the NPF minimum should be increased.
No justification is given for the additional flexibility allowance of 25% in urban and 30% in rural areas, and that these percentages are too high.	No change.	Justification for the flexibility is set out within the Housing Land Requirement Explanatory Report (November 2021) paras 52 and 53.
Concern that the MATHLR process has been undertaken without reference to other NPF policies or the climate or biodiversity crises.	No change.	The MATHLR process has been undertaken looking at NPF4 as a whole. Revised NPF policy 16 Quality Homes has a number of connections to other policies within NPF, including Tackling the climate and nature crises, Climate mitigation and adaptation, Brownfield, vacant and derelict land and empty buildings, Local living and 20 minute neighbourhoods and Infrastructure First.

Issue	Change	Reason/Comments
Close monitoring and biennial review of the impact of MATHLRs will be required.	No change.	The figures will inform the Local Housing Land Requirement and associated pipeline, which will be monitored via Housing Land Audits and LDP Delivery Programmes.
Lack of transparency for members of the public on the basis for these numbers.	No change.	A Housing Land Requirement Explanatory Report was published alongside Draft NPF4, which sets out how we have moved from the statutory requirement to the figures proposed in Draft NPF4. An Assessment Report for each authority is available, as is the material authorities provided.
Order of local authorities within Annex.	Local authorities have been reordered in alphabetical order.	For ease of reference.

Review of MATHLR Figures

The MATHLR figures have been reviewed and refined to reflect up-to-date HNDA information, using the latest available existing need figures. This has resulted in a revised MATHLR figure for Local Authority areas below. Figures which have changed from Draft NPF4 are shown in bold in Figure 5.

- City of Edinburgh
- Dundee City
- East Lothian
- Fife (Central and South)
- Fife (North)
- Midlothian
- West Lothian

Details of the above changes are set out within the Housing Land Requirement Explanatory Report – Addendum.

Figure 5: Reviewed MATHLR Figures

Local, City Region and National Park Authority	Proposed MATHLR	Finalised MATHLR	Completions (2010-19)	Proposed MATHLR				Finalised MATHLR			
				Existing Need	Households	Flexibility %	Flexibility Amount	Existing Need	Households	Flexibility %	Flexibility Amount
Aberdeen City	7,000	7,000	7,734	500	5,100	25	1,400	500	5,100	25	1,400
Aberdeenshire	7,550	7,550	12,132	400	5,400	30	1,740	400	5,400	30	1,740
Angus	2,550	2,550	2,464	1,350	650	30	600	1,350	650	30	600
Argyll & Bute	2,150	2,150	2,025	850	800	30	495	850	800	30	495
Cairngorms National Park	850	850	850	50	600	30	195	50	600	30	195
City of Edinburgh	41,300	36,750	16,654	8,950	24,100	25	8,263	5,300	24,100	25	7,347
Clackmannanshire	1,500	1,500	1,145	900	300	25	300	900	300	25	300
Dumfries & Galloway	4,550	4,550	2,966	700	2,800	30	1,050	700	2,800	30	1,050
Dundee City	4,200	4,300	2,377	2,150	1,200	25	838	2,250	1,200	25	863
East Ayrshire	4,050	4,050	3,669	650	2,450	30	930	650	2,450	30	930
East Dunbartonshire	2,500	2,500	3,678			25				25	
East Lothian	6,400	6,500	5,124	750	4,350	25	1,275	850	4,350	25	1,300
East Renfrewshire	2,800	2,800	2,999			25				25	
Eilean Siar	192	192	1,270	81	67	30	44	81	67	30	44
Falkirk	5,250	5,250	4,579	350	3,850	25	1,050	350	3,850	25	1,050
Fife (Central and South)	5,650	5,550	9,613	1,750	2,750	25	1,125	1,700	2,750	25	1,110
Fife (North)	1,700	1,750	2,403	650	700	25	338	700	700	25	353
<i>All Fife*</i>	<i>7,350</i>	<i>7,300</i>	<i>12,016</i>	<i>2,400</i>	<i>3,450</i>	<i>25</i>	<i>1,500</i>	<i>2,400</i>	<i>3,450</i>	<i>25</i>	<i>1,450</i>
Glasgow City	21,350	21,350	15,338			25				25	
Highland	9,500	9,500	10,300	2,100	5,200	30	2,190	2,100	5,200	30	2,190
Inverclyde	1,500	1,500	2,397			25				25	
Loch Lomond & Trossachs N.Park	300	300	300	100	150	30	75	100	150	30	75
Midlothian	8,050	8,850	6,271	500	5,950	25	1,613	1,100	5,950	25	1,766
Moray	3,450	3,450	4,514	500	2,200	30	810	500	2,200	30	810
North Ayrshire	2,950	2,950	3,123	2,300	50	25	588	2,300	50	25	588
North Lanarkshire	7,350	7,350	7,567			25				25	
Orkney	1,600	1,600	1,450	250	1,000	30	375	250	1,000	30	375
Perth & Kinross	8,500	8,500	5,560	1,350	5,200	30	1,965	1,350	5,200	30	1,965
Renfrewshire	4,900	4,900	5,846			25				25	
Scottish Borders	4,800	4,800	3,512	400	3,300	30	1,110	350	3,300	30	1,105
Shetland	850	850	993	400	250	30	195	400	250	30	195
South Ayrshire	2,000	2,000	2,400	1,350	200	30	465	1,350	200	30	465
South Lanarkshire	7,850	7,850	11,341			25				25	
Stirling	3,500	3,500	2,878	300	2,400	30	810	300	2,400	30	810
West Dunbartonshire	2,100	2,100	2,601			25				25	
West Lothian	9,600	9,850	6,568	1,200	6,500	25	1,925	1,400	6,500	25	1,965

* The total includes Fife North and Fife Central and South. This reflects that Fife was formerly part of two Strategic Development Plan areas and contributed to separate Housing Need and Demand Assessments.

Annex C – Glossary of Definitions

Summary of representations

Around 200 respondents made a comment at Question 58 on the Glossary. This included a range of frequently suggested additional terms to define, and suggested changes to existing definitions.

Overview of changes

All of the terms suggested to be added or amended were carefully considered. This led to 22 terms being added to the Glossary following specific stakeholder suggestions, and a further 23 terms added to provide further clarity and respond to general points about tightening up the use of language. Amendments were made to some definitions to respond to points made by stakeholders, where changes help to provide clarity and certainty. Some terms raised by stakeholders were not added, or amended, this was generally because they related to a value based term, which is a matter for the decision-maker, or because the definition that was included in the Draft NPF4 is an established definition already in use, or because the term no longer appears in the revised version.

Details of changes

Terms added

Terms added following stakeholder suggestion - to respond to stakeholder requests and provide clarity.	Additional terms added - to provide clarity.
<ul style="list-style-type: none"> • Ancient woodland • Community wealth building • Deliverable Housing Land Pipeline • Derelict land • Flooding from all sources • Flood risk area or at risk of flooding • Infrastructure First • Just transition • Local authority supported affordable housing plan • Minimum All-Tenure Housing Land Requirement • Nature-based solutions • Negative emission technologies • Prime agricultural land • Ramsar sites • Sustainable travel • Town Centre First Assessment • Vacant land 	<ul style="list-style-type: none"> • 4G • 5G • Business and industry • Carbon capture, utilisation and storage • Climate change adaptation • Climate change mitigation • Essential infrastructure • Green recovery • Infrastructure first • Landbank (construction aggregates) • Local housing land requirement • Locality plan • Locations of concern • National Transport Strategy • Outcomes Improvement Plan • Place Principle • Play sufficiency assessment • Protected characteristics

<ul style="list-style-type: none">• Veteran tree• Wellbeing economy• Wheeling• Woodland	<ul style="list-style-type: none">• Public benefits• Town centre vision• Unused or under-used land
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Terms Amended

Terms amended in response to stakeholder views/corrections
<ul style="list-style-type: none">• 20 minute neighbourhood• Affordable Home / Affordable Housing• Enabling development• Green space• Housing Land Requirement• Nature network

List of Acronyms Used in Explanatory Report

20MN	20 minute neighbourhood
the 2019 Act	the Planning (Scotland) Act 2019
the Act	The Town and Country Planning (Scotland) Act 1997 (as amended)
AoC	Agent of Change
BARR	Buildings at Risk Register
BGI	Blue Green Infrastructure
BRIA	Business and Regulatory Impact Assessment
CCC	Climate Change Committee
CCS	Carbon Capture and Storage
Circular 3/2012	Planning Circular 3/2012: planning obligations and good neighbour agreements (revised 2020)
Circular 4/1998	Planning Circular 4/1998: the use of conditions in planning permissions
COSLA	Convention of Scottish Local Authorities
Covid19	Coronavirus
CPO	Compulsory Purchase Order
CSGN	Central Scotland Green Network
CWB	Community wealth building
DM	Development management
DMRB	Design Manual for Roads and Bridges
DPMTAG	Development Planning and Management Transport Appraisal Guidance
EIA	Environmental Impact Assessment
ETSU – R – 97	A commonly applied methodology for wind farm noise impact assessment
EV	Electric vehicle
HES	Historic Environment Scotland
HIA	Health Impact Assessment
HIIA	Health Inequality Impact Assessment
HLA	Housing Land Audit
HLR	Housing Land Requirement
HNDA	Housing Need and Demand Assessment
HSCSC	Health, Social Care and Sport Committee (of the Scottish Parliament)
IF	Infrastructure First
IIA	Integrated Impact Assessment
IIH	Infrastructure Investment Hierarchy
IIP	Infrastructure Investment Plan
INTOG	Innovation and Targeted Oil and Gas Leasing
LA	Local Authority
LBAPs	Local Biodiversity Action Plans
LDP(s)	Local Development Plan(s)
LGHP	Local Government, Housing and Planning Committee (of the Scottish Parliament)
LPP	Local Place Plan

List of Acronyms Used in Explanatory Report

Km	kilometre
MATHLR	Minimum All-Tenure Housing Land Requirement
MW	Megawatt
NDs	National Developments
NFU	National Farmers Union
NPF	National Planning Framework
NPF4	National Planning Framework 4
NTS2	National Transport Strategy 2
NWCWN	National Walking, Cycling and Wheeling Network
OSS	Open Space Strategy
PAN 1/2011	Planning Advice Note 1/2011: Planning and noise
PAN 2/2011	Planning Advice Note 2/2011: Planning and archaeology
PAS	Planning Aid Scotland
PAs	Planning authorities
Para(s)	Paragraph(s)
RAINE	Rural Affairs, Islands and Natural Environment Committee (of the Scottish Parliament)
RSS(s)	Regional Spatial Strategy/(Strategies)
RTS	Regional Transport Strategy
RTPI	Royal Town Planning Institute
S75	Section 75 of the Town and Country Planning Act on planning obligations
SEA	Strategic Environmental Assessment
SEPA	Scottish Environmental Protection Agency
SG	Scottish Government
SPA	Special Protection Area
SPP	Scottish Planning Policy (2014)
STPR (2)	Strategic Transport Projects Review 2
STH	Sustainable Travel Hierarchy
SUDS	Sustainable Drainage Systems
TPO(s)	Tree Preservation Orders
UNCRC	United Nations Convention on the Rights of the Child
UNESCO	United Nations Educational, Scientific and Cultural Organization
VDL	Vacant and Derelict Land
WEWS	Water Environment and Water Services (Scotland) Act 2003



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