

National Planning Framework 4

Analysis of responses to the Call for Ideas

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Introduction

Context

The National Planning Framework (NPF) is a long-term plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth. The current framework - NPF3 - was published in 2014 and the Scottish Government has now begun a process of review and preparation of a new framework – NPF4.

NPF4 is expected to look very different to NPF3, with a longer time horizon to 2050, fuller regional coverage and improved alignment with wider programmes and strategies, including on infrastructure and economic investment. NPF4 will also incorporate Scottish Planning Policy so that, for the first time, spatial and thematic planning policies will be addressed in one place. It will have the status of the development plan for planning purposes. This is a change to the current position and will mean that its policies will have a stronger role in informing day-to-day decision making.

The Call for Ideas

The Scottish Government is committed to encouraging interest and wide public involvement in the preparation of NPF4 and is engaging with the public, community, voluntary and private sectors, as well as academics, experts and professional bodies. To this end, a Call for Ideas on NPF4 was launched on 9 January 2020, including a roadshow with workshop sessions in locations across Scotland. Individuals and stakeholders were invited to participate in workshop sessions and/or make a written submission. Workshops had to be curtailed as a result of the COVID-19 outbreak, by which point 13 locations around Scotland had been visited. Also in response to COVID-19, the deadline for submission of written responses was extended from 31 March to 30 April 2020.

The Scottish Government's Transforming Planning website¹ provides a wide range of resources to support the NPF4 development process, including the early engagement stage. These resources include:

- **2050 Think Pieces** – a collection of 35 think piece contributions on Scotland 2050 provided by planning stakeholders that are designed to stimulate discussion and debate during the early engagement period and to help stakeholders to think about priorities for NPF4.
- **Scottish Planning Policy** materials, including background information notes on the 32 policy topics that will need to be addressed when preparing the draft NPF4. These notes set out the existing planning policies, what has changed since they were introduced, a proposed key objective of NPF4 and a series of questions for consultees. The 32 policy topics are grouped under one of three themes. **People** covers how planning can support wellbeing ensuring communities have access to services and facilities; **Work** covers effective and

¹ See <https://www.transformingplanning.scot>

efficient planning to support inclusive growth; and **Place** covers how planning can maintain and enhance the unique character and identity of our natural and built environment.

- **Housing Technical Discussion Paper** setting out the Scottish Government's current thinking on the methodology that could be used for setting 'targets for the use of land for housing in different areas of Scotland' as required in NPF4 by the Planning (Scotland) Act 2019.
- **National Development factsheet, invitation and response form**, with information covering the assessment criteria for assessing potential National Developments and how to make a suggestion.
- **Regional Spatial Strategies factsheet** covering the role and development of Regional Spatial Strategies and their relationship to NPF4.
- **Integrated Impact Assessment Scoping Report** to inform the data-gathering and early engagement stages of the NPF4 preparation process. The report sets out the various assessments to be undertaken to assess the impacts of NPF4 on the environment, society and equalities, and businesses.

While any ideas could be submitted, the Scottish Government noted that they were particularly interested to hear thoughts on **five key issues** namely:

- What development will we need to address climate change?
- How can planning best support our quality of life, health and wellbeing in the future?
- What does planning need to do to enable development and investment in our economy so that it benefits everyone?
- What policies are needed to improve, protect and strengthen the special character of our places?
- What infrastructure do we need to build to realise our long-term aspirations?

A number of further issues to think about accompanied each of the five questions.

Number and profile of respondents

In total, 328 respondents made a submission to the Call for Ideas that could be included within the analysis². The majority of respondents were organisations (259 respondents) with 69 individual members of the public also making a submission.

Organisational respondents have been allocated to one of eighteen categories by the analysis team and the Scottish Government³. A breakdown of the number of responses received by respondent type is set out in Table 1 below and a full list of

² A small number of respondents asked for their response to be viewed only by the Scottish Government.

³ Organisations were placed into a group based on name and, where available, after accessing information on relevant websites including the organisation's own website. The web search was carried out in May 2020.

organisational respondents who agreed that their response should be published by name is provided at Annex 1.

Table 1

Respondents by type	Total
Active Travel-related Third Sector Organisation or Campaign Group	7
City Region or Strategic Development Planning Authority	3
Community Council or Residents Association	20
Culture or Heritage Company, Association or Representative Body	8
Development, Property or Land Management Company or Representative Body	30
Energy-related Supplier, Developer, Association or Body	49
Environment or Natural Heritage Third Sector Organisation or Campaign Group	20
Greenbelt Campaign Group	3
Local Authority	33
Planning, Architecture or Housing Representative Body or Campaign Organisation	7
Planning, Development, Architectural or Environmental Consultancy	8
Public Body, Commission or Taskforce	15
Third Sector, Community or Campaign Organisation	18
Transport Partnership	4
Transport-related Body, Association or Provider	15
Other Infrastructure-related Company or Representative Body	4
Other Private Sector	7
Other Representative Body, Faculty, Network or Academic Group	8
Total organisations	259
Individuals*	69
All respondents (for main analysis)	328

*Some responses were anonymised before being passed to the study team. This figure assumes all those responses were from individuals and no individual submitted more than one response.

All responses to be published are available from the Scottish Government's website⁴. A small number of the responses submitted by organisations have been published anonymously. In these cases, organisations have been assigned an organisation type (and therefore are included in the figures set out in Table 1), but they are not listed at Annex 1.

⁴ <https://www.transformingplanning.scot/national-planning-framework/call-for-ideas/>

Nature of submissions and analysis

The submissions received were very diverse, with variation based on focus, structure and length. They ranged from relatively brief statements primarily addressing one issue, through to very extensive submissions covering some or all of the following elements:

- Answers to some or all of the five key issues questions, sometimes including comments on some or all of the further issues to think about.
- Comments on one or more of the 32 policy topics for Scottish Planning Policy, sometimes including comments on the proposed objective of NPF4 and some or all of the questions for consultees.
- Detailed comments on the Housing Technical Discussion Paper, which often followed the structure of the Paper and addressed the particular questions set out within it. The submissions, and the resultant analysis, is somewhat different in style and level of detail to other sections of the report and is more along the lines of a standard consultation than other parts of the Call for Ideas.
- National Development suggestions. These were sometimes submitted on the relevant form, but were also submitted in other formats, including through the submission of business plan style documents. Some of these suggestions were also accompanied by other material, for example addressing the key issues questions, which focused on how the suggested National Development could contribute to meeting NPF4 objectives.

There were also statement style responses of varying length and complexity, addressing one or more issue but which did not refer directly to any of the elements described above.

- Some had been prepared and/or were submitted on behalf of a client by a third party, such as a planning consultant. These responses tended to be National Development suggestions or relate to electricity generation.
- A small number of responses took the form of feedback from workshop style events and were sometimes in annotated diagram form.

After an initial review of the submissions and following discussions between the Scottish Government and the analysis team, all materials were entered into a spreadsheet in preparation for the main analysis phase. If it was not possible to include any material, for example because of the use of diagrams or maps, a cross reference to the original submission was added.

The spreadsheet was structured primarily around the 32 policy topics with any materials relevant to one of those policy topics extracted from the submission and recorded under that topic. In addition, where respondents had addressed one or more of the five key issues questions, their answers were also recorded under those questions. The spreadsheet also recorded where National Development suggestions had been made, and any comments on the Housing Technical Discussion Paper, the Integrated Impact Assessment Scoping Report or on Regional Spatial Strategies.

Report structure

Given the volume and complexity of materials submitted, this report aims to give an overview rather than representing all issues covered. It seeks to avoid repetition where possible, although the comments made at the key issues questions often reflected themes covered by one or more of the policy topics.

It is not expected that all readers will read the full report in sequence and it is structured to allow any section to be read as a stand-alone analysis, but with cross references to related material in other sections where appropriate.

The remainder of this report is structured as follows:

- **Summary of key issues** - This part of the report gives a brief, summary overview of themes raised at the five key issues questions.
- **People** - This part of the report covers 10 policy topics: Community facilities; Culture and the arts; Digital connectivity; Green infrastructure; Gypsy Travellers; Health; Housing - Affordable; Housing - General; Housing - Specialist; and Waste.
- **Work** - This part of the report covers 8 policy topics: Aquaculture; Business and employment; Energy - Electricity; Energy - Heat; Mineral extraction; Rural development; Tourism; and Town Centres.
- **Place** - This part of the report covers 14 policy topics: Air quality; Climate change; Coastal planning; Flooding; Green belts; Historic environment; Infrastructure; Land assembly and compulsory purchase; Natural environment; Peatland; Placemaking; Sustainability; Transport; and Vacant and derelict land.
- **Housing Technical Discussion Paper** - This part of the report covers issues raised by respondents about the paper.
- **National Developments** - This part of the report gives a brief overview of the number and range of National Development suggestions made.
- **Integrated Impact Assessment** - This part of the report provides a summary analysis of comments made about the Integrated Impact Assessment report.

As noted above, it is not expected that all readers will wish to read the full report in sequence. Given this, please note that The Planning (Scotland) Act 2019 is referenced throughout as 'the 2019 Act' and that the abbreviations used throughout the report are presented in Table 2 below but have not been given in full at first use.

Table 2 – Abbreviations used

Abbreviation	Definition
CCS	Carbon Capture and Storage
CHMA	Centre for Housing Market Analysis
EFW	Energy from Waste
EIA	Environmental Impact Assessment
IIA	Integrated Impact Assessment
ISP	Internet Service Provider
HIA	Health Impact Assessment
HLA	Housing Land Audit
HMA	Housing Market Area
HMP	Housing Market Partnership
HNDA	Housing Need and Demand Assessment
HSCP	Health and Social Care Partnership
LDP	Local Development Plan
LHEES	Local Heat and Energy Efficiency Strategy
LHS	Local Housing Strategy
LPA	Local Planning Authority
LPP	Local Place Plan
NPF	National Planning Framework
NTS2	National Transport Strategy 2
NRS	National Records of Scotland
PAN	Planning Advice Note
PAS	Publicly Available Specification
PSED	Public Sector Equality Duty
PV	Photovoltaic
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
RTIF	Rural Tourism Infrastructure Fund
SDP	Strategic Development Plan
SEA	Strategic Environmental Assessment
SEPA	Scottish Environment Protection Agency
SNH	Scottish Natural Heritage
SPP	Scottish Planning Policy
STPR2	Strategic Transport Projects Review 2
SuDS	Sustainable Drainage System
VDL	Vacant and Derelict Land

Summary of key questions

This section provides a summary overview of responses to the five key issues questions.

1. What development will we need to address climate change?

Reaching the target of net zero emissions by 2045

The urgency of tackling climate change was a theme of many responses with a view that NPF4 offers a real opportunity to place the planning system at the heart of the climate change agenda, and that NPF4 will be crucial to ensuring that all decisions consider the net zero by 2045 target.

There was a call for NPF4 to be fully aligned with Scottish Government's Climate Change Plan and with the with the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, including by supporting the delivery of local climate change adaptation frameworks. It was also suggested that a more overarching and joined up approach, that better reflects current understanding than SPP now does, will give planning authorities a better basis to include achievable and realistic policies in their LDPs. Other comments referred to the importance of land use to tackling climate change, including through the alignment of NPF4 with the Land Use Strategy.

Respondents often highlighted particular areas of planning policy which they saw as key. These are summarised in turn below.

Sustainable energy: There was support for maximising the contribution of renewable electricity generation to meeting the net-zero target in a sustainable way and it was suggested that NPF4 should be clear that a significant increase in the generation of renewable energy will be required. There were calls for NPF4 to support the development of energy storage capacity and there were frequent references to the need to improve grid infrastructure and capacity. While the importance of onshore wind was often acknowledged, there were differing views on the extent to which it should be prioritised. There were calls for a presumption in favour of consent for renewable energy projects, consents in perpetuity, and reviews of the policy on Wild Land Mapping and landscape capacity studies. There were calls for NPF4 to promote decentralisation of electricity generation including small scale local and off-grid production as well as promoting community energy and energy co-ops.

Sustainable and active travel: The importance of supporting the NTS2 was highlighted, along with the need for a major shift in emphasis from roads and cars to walking, cycling and public transport. There were calls to consider the location and design of new developments with a view to reducing dependency on cars, and to provide safe walking and cycling routes. This was sometimes associated with the need to prioritise or invest in active travel infrastructure and improvements to public transport. The role of multi-modal transport hubs and encouraging multi-method travel were highlighted and it was suggested there should be investment in

transport interchanges. The importance of decarbonising transport was also noted and there were calls for a greatly increased charging network for electric vehicles.

Nature-led approaches and green infrastructure: The inter-relationship between the climate change emergency and the natural environment was highlighted and it was argued policies designed to contribute to meeting net-zero carbon targets must also take account of opportunities to enhance biodiversity and aid nature recovery. The important roles of peatland in storing carbon, maintaining biodiversity and flood mitigation were all highlighted. There were also many references to the benefits of green infrastructure including providing a carbon sink or otherwise contributing to climate change targets, contributing to flood management and enhancing biodiversity.

Circular economy: There was broad support for development of a circular economy and embedding of zero waste principles in NPF4, including a presumption in favour of enhancing, repurposing or maintaining existing infrastructure and the repair and re-use of existing buildings. This was sometimes connected with unlocking the potential of vacant and derelict land, protecting greenbelts or creating and preserving greenspaces. Respondents commented on requirements for appropriate infrastructure for a circular economy and sustainable waste management and the importance of waste prevention, re-use and recycling was also noted.

Design and energy efficiency of buildings: Many of the comments addressed the critical role of the built environment in the mitigation of, and adaptation to, climate change. General comments included that properties must be low carbon by design and that this could be taken forward through changes to Building Standards. It was suggested that reducing greenhouse gas emissions over a building's lifetime needs to be at the top of the hierarchy of factors in the planning permission decision making process. There were calls for all new homes to be certified to Passivhaus standard. The value of the re-use of existing buildings over new build was highlighted, along with the importance of retro-fitting efficiency measures for the existing building stock.

Carbon sequestration or capture: A range of issues were raised in relation to carbon capture, sequestration or offsetting. They included that one approach could be offering carbon sequestration opportunities, such as through woodland creation and management, peatland restoration and wetland creation and management. Another theme was in relation to CCS. It was suggested that there is no credible scenario for meeting net zero targets that does not include CCS and that Scotland is uniquely placed to take advantage of the opportunities CCS presents.

Opportunities to support jobs and the economy

There was a call for NPF4 to set out a framework to stimulate and encourage job creation, and the potential to create 'green' job opportunities was highlighted, including to replace jobs lost in the fossil fuel-based industries. The potential of low carbon sector businesses was highlighted, including in relation world-class training and research facilities.

In addition to the wider green economy, there were specific references to NPF4 offering the opportunity to create a positive development context for renewable energy, which can help in promoting investment in renewable technologies and development on the ground. It was suggested that affordable renewable power could transform Scotland's economy in the medium and long term, and that as Scotland has been at the forefront of renewable energy developments there is great potential to build on this, especially with the transferable skills and expertise that exist through the oil and gas sectors.

Other issues highlighted included localising production of goods and services, such as local food production for communities and localised energy production and distribution. It was suggested this would create jobs within communities, reducing the need to travel to access goods, services and jobs. The potential for job creation to support improvements to energy efficiency and other retrofitting of the existing building stock was also highlighted.

Specific recommendations included that NPF4 should identify clusters and activity with the greatest potential to address climate change and that this could relate to a business sector or infrastructure capacity. There was a view that, as NPF4 will provide a national perspective, it needs to show how different clusters of business sectors, population, skills and infrastructure interlink and connect Scotland to provide solutions. There was also reference to creating potential low carbon, sustainability focused investment hot spots and that if these strategically critical sites are identified in NPF4, regional economic partnerships can then collaborate in relation to sites in their area.

More resilient places

The importance of creating sustainable, resilient places was a theme for many respondents, including that the presumption in favour of sustainable development should remain a component of national planning policy. It was suggested that, if Scotland is to meet its emissions reduction targets, it needs to deploy a more purposeful land use planning approach to encourage more development that supports inclusive growth, wellbeing and the sustainability agenda.

In terms of protection against flooding, there was agreement that land required for flood management now and in the future should be safeguarded and that development on flood plains should be discouraged or prevented. The benefits of natural flood management were often referenced, including the need to manage rainwater close to where it falls. It was suggested flood management needs to be considered in the management of all land with both farming and forestry/tree planting playing roles in flood mitigation.

A requirement for improved integration between the flood risk management and coastal protection planning activities of SEPA/local authorities and local development planning was suggested, and some respondents argued that there should be consideration for policies on managed coastal retreat from at-risk areas.

With particular reference to developing in a sustainable way, it was suggested that a whole systems approach that considers the environmental, social and economic impact of any planning decision should be presumed. It was suggested that

delivering sustainable development is a key function of the planning system but that support and guidance is required.

Climate change friendly places in the future

In terms of what climate change places might look like, ideas often centred around having addressed many of the challenges identified in order to reach the target of net zero emissions by 2045.

The focus tended to be on our places being well connected through sustainable travel options, including that integrated, low carbon public transport options that would mean the use of cars in residential areas and town centres would be a relative rarity. Active travel would be the norm and would have been supported by investment in safe and well-placed walking or cycling routes that connect with public transport options. More localised services would allow people to access much of what they need closer to home.

Flood risk would have been reduced through nature-based solutions and urban air quality would have been improved through the creation of more urban green spaces. These urban green spaces would be connected via local, regional and ultimately national networks, providing carbon sequestration and, with the right planting in the right places, resources for locally grown foods within each community.

Some comments focused on the urban or suburban form, and the density of development. They included that benefits flow from increased urban densities, including playing a critical role in determining carbon emissions and the carbon intensity of a given population. Other comments included that, while increased urban density has a clear link with reducing carbon emissions, a policy framework is required that achieves this without compromising on quality of place. There was also a call for NPF4 to include a specific policy setting out the need for the highest standards of sustainable design and construction.

It was also suggested that NPF4 should support inclusivity and community wealth building, including by ensuring that communities are all benefiting from the local economy through support for a diverse range of local businesses and approaches to create a resilient community.

2. Supporting our quality of life, health and wellbeing in the future

Where we might want to live in 2050

Many comments focused on the type of communities in which people might want to live in the future, with successful placemaking often seen as central to the purpose of planning and integral to achieving many of Scotland's National Performance Framework Outcomes. There was a consensus that placemaking should remain central to NPF4, and that the new planning framework should continue to identify the qualities of successful places in Scotland.

Placemaking was seen as connecting many planning policy themes, and as key to both delivering new development as well as regenerating existing communities. Engaging with local communities was seen as key, with NPF4's role being to set

the strategic and policy content for that engagement. There were calls for a community-led approach to be taken, including by placing a greater emphasis on community priorities established by effective and inclusive consultation.

It was suggested that whether it be social or private, new housing should be built in places where communities can thrive, residents have access to services and are well connected, and with a view to creating healthy sustainable lifetime communities. In 2050 the aspiration should be that Scotland is made up of communities with a good balance of affordable and high-quality housing options and that meet the needs of people at all stages of life. Most essential services including education, health, community facilities and food will be accessed at a local level. Other types of facilities or services, such as local hubs with office space shops, safe play spaces and sports facilities will also be important, and it was suggested that the COVID-19 crisis has highlighted importance of a range of local services being available.

It was argued that NPF4 should require developers and planning authorities to consider the impact of new development on existing community facilities, and any requirement for new facilities that the development may generate. One suggestion was that, wherever possible, new homes should be built within the existing boundaries of towns and villages to allow easy access to existing community facilities. There was also a view that development obligations and conditions should be used to provide facilities if capacity would otherwise be exceeded.

By 2050, it was thought that the design and layout of communities will encourage healthy lifestyles and promote wellbeing. An accessible and inclusive environment will help sustain better health, prevent isolation and promote participation, with an opportunity for planning to promote building and environmental design standards which prioritise accessibility, inclusion and integration for all residents. It was suggested that planning can affect quality of life and wellbeing in many ways, including as part of Scotland's whole system approach to health improvement.

Connections were made to the health and wellbeing impact of other planning themes, including green infrastructure and having access to greenspaces and nature, sustainable transport and promoting and enabling active travel. It was suggested that the planning system has been progressive in its acknowledgement of place and its influence on the health outcomes of society in recent years and that NPF4 provides an opportunity to define and further support the attainment of desirable social and health outcomes within planning policy and applications, and to align the development process with wider aspirations for better wellbeing outcomes.

Finally, it was thought where we live in 2050 will very much be influenced by how we live and work, and that while there will always be a pull towards the cities and urban areas, advances in technology will create opportunities to live in a wider range of locations and yet remain connected.

How many and what types of homes we will need

It was suggested that NPF4 presents an opportunity to assist in shaping an evolving housing system in line with the ambitious vision and principles of 'Housing to 2040'. It was also suggested that LPPs, LDPs and RSSs all have a role to play

and that NPF4 should allow scope for regional and local priorities to be considered. NPF4 should also ensure that the planning system is empowered to enable forms of development which enhance existing places, and to resist poor quality housing that is not sustainable.

There was a call for homes for all to be a central objective for NPF4, with the importance of those homes being affordable also highlighted.

In terms of whether there should continue to be a focus on delivering new homes, some respondents considered that the Scottish Government should (continue to) set housing targets. There were some references to the national targets for affordable new homes, including how local or regional plans are seeking to support the Scottish Government in meeting those targets. More generally, there was a suggestion that new homes should be classified as essential infrastructure and that there should be a pan-Scotland all-tenure housing delivery target of 25,000+ homes a year.

The shortage of available affordable housing, and the subsequent social and economic repercussions, were seen as critical to the health and wellbeing of the individuals and families affected. Other comments included that investing in affordable housing generates significant benefits for the economy and that ensuring that investment can be realised in rural areas, including to support local employment and skills development, is worthy of support from planning policy.

Some respondents identified reasons or factors which they considered to be limiting the number of new affordable homes Scotland can provide. These included the development of new build housing being monopolised by volume builders and that ambitious targets for affordable housing cannot be met without the delivery of private housing and the associated infrastructure it delivers.

Respondents commented on the particular challenges associated with delivering affordable housing in rural, remote and/or island communities. In terms of the impact of a lack of appropriately located, fit-for-purpose housing, the challenges faced by island communities, including in relation to population decline and the sustainability of local services, were highlighted. It was suggested that NPF4 needs to enable distinct and responsive approaches to affordable housing delivery for rural and islands areas.

In terms of the focus of policy going forward, suggestions included that it should take account of quality and design and the importance of placemaking, of creating high-quality and well-functioning places and mixed communities, and of how new housing can accommodate a range of needs as part of better integrated communities. It was seen as important not to focus simply on numbers but also on quality including the design of new homes and that they are accessible and built to lifetime homes standards.

In addition to comments relating to new supply, some respondents addressed issues associated with the existing housing stock. These included that refurbishment, adaptation and improvement of existing stock and associated

community regeneration have a role to play in a refocusing on quality of housing. The importance of continuing to tackle empty homes was also highlighted.

Encouraging more people to live in rural Scotland

There was support for using the planning system to stem depopulation in sparsely populated areas. Among requirements identified as necessary for rural populations to be maintained or increased were sufficient housing, employment and educational opportunities, with an associated requirement for good digital connectivity. The need for a balanced population profile, with economically active people encouraged to live in rural areas, was highlighted.

It was seen as important to continue to differentiate between different types of rural areas, and to recognise that rural areas close to towns and cities may experience very different pressures, with concerns of an increase in *ad hoc* residential development, or creating commuter housing in attractive areas of countryside.

The need for a strong emphasis on how to bring multiple benefits to depopulated areas was highlighted, as was a rural infrastructure first approach, with longer term strategic planning to address issues such as transportation, health and education. Stronger links between planning, housing, infrastructure and economic policies were argued to be necessary if ambitions for rural areas are to be successful.

The particular challenges and potential around supporting business and employment in rural and island locations were highlighted. It was reported that the leading recommendation from the National Council of Rural Advisers' *New blueprint for Scotland's rural economy* (2018)⁵ was that a vibrant, sustainable and inclusive rural economy can only be achieved by recognising its strategic importance and effectively mainstreaming it within all policy and decision-making processes. It was suggested that NPF4 needs to recognise the context and challenges are different in rural and island areas.

3. Enabling development and investment in our economy

What our economy might look like in 2050

There was broad support for an approach that promotes business and industrial development through sustainable and inclusive economic growth while safeguarding and enhancing the natural and built environments. It was argued that the presumption in favour of sustainable development should remain a component of national planning policy.

The connection was often made between inclusive economic growth and reducing inequality and tackling deprivation and it was noted that sustainable and inclusive prosperity is a central objective of the NPF and one to which all other policies should work. With particular reference to developing in a sustainable way, it was suggested that a whole-systems approach that considers the environmental, social and economic impact of any planning decision should be presumed.

⁵ Available at: <https://www.gov.scot/publications/new-blueprint-scotlands-rural-economy-recommendations-scottish-ministers/>

It was thought that the economy in 2050 will look very different as it moves to decarbonise and that NPF4 should set the framework for sustainable investment in Scotland's national, regional and local economies. It was suggested that, for inclusive growth across the country to be achieved, it will be important to prioritise investment in areas where growth lags behind and also to ensure a regional approach is taken to enable economic growth. RSSs were expected to help with this.

One current spatial disparity highlighted was that between east and west. It was reported that economic activity, investment patterns and associated demand for house building, contrasts significantly across Scotland, particularly in terms of an east-west divide across central Scotland. It was suggested that NPF4 should be informed by a revised national economic strategy that considers the disparity of investment and growth between the east and west coast areas of Scotland. Similarly, there was a call for the prioritising of rural and western communities to reduce population shift to the east of the country.

The importance of connecting people to economic opportunities was highlighted, with specific suggestions including directing provision, including of large public sector developments and possibly National Developments, towards areas most in need of an economic boost. Promoting growth corridors as a means of linking hubs of economic activity and generating stronger outputs and improved outcomes for areas experiencing economic challenges was also proposed.

To enable planning authorities, and by extension LDPs, to allocate land which will meet the needs of various economic sectors, it was suggested that NPF4 should set out a process through which business and industrial land audits can be informed by up-to-date market intelligence and robust demand forecasting. Introducing a policy presumption against the loss of economic land to alternative land uses was also proposed. However, it was also suggested that while relevant policies must be prepared to protect existing business parks and premises, there should be flexibility to allow alternative developments if the industry would no longer be in use and the building or business park is unsuitable for any other business use.

Responding to challenges and building resilience

The impact of both Brexit and the current COVID-19 pandemic on Scotland's economy were noted and it was suggested that greater importance be placed on the need to find sustainable investment models and low carbon, secure and rewarding jobs. Domestic supply chains will need to be stronger to ensure future resilience. It was suggested that Brexit brings specific risks to island authorities, including because they benefit currently from high levels of support from a wide range of EU funding initiatives and a high proportion of the island workforce being employed in Brexit-sensitive industries.

Respondents commented on changing working patterns and their implication for the planning system, including meeting the key challenge of ensuring that premises and infrastructure meet changing business needs.

The internet and e-commerce are likely to continue to be a key driver of economic activity, and it was suggested that the trend toward home-working, which was widely seen as likely to be accelerated by the COVID-19 crisis, will lead to changes in requirements for both commercial and domestic properties. It will be important to accommodate the need or preference for increased home or agile working as part of future development and investment. This may require a reconsideration of the size of houses and layout of residential developments as people seek additional space to work from home and there being more of a focus on mixed use developments which offer the potential to live and work in close proximity and which offer flexibility of use depending on demand. The connection was frequently made between changes to working patterns and the need for robust and easily accessible digital infrastructure.

In terms of COVID-19, the potential to support a green recovery, including by maximising the role of nature-based solutions in a new economy and supporting lower carbon lifestyles with the long term benefits they bring, was highlighted. Specific suggestions included focusing on the low carbon, green economy. The potential of low carbon sector businesses was highlighted, including in relation to world-class training and research facilities. In addition to the wider green economy, there were specific references to NPF4 offering the opportunity to create a positive development context for renewables which can help in promoting investment in renewable technologies and development on the ground.

Other sectors identified as offering potential for growth included the agriculture and food industries, leisure and tourism, the blue economy, and the construction sector, including around tackling the skills shortage across the county to undertake energy efficiency measures and retrofitting.

4. Improving, protecting and strengthening the special character of our places

Special places that will need protection in the future

In terms of specific places thought to require protection, a suite of new national parks was proposed, including in Galloway and in the Borders. Consideration of a role for Coastal and Marine National Parks was also suggested. In addition, there were calls for greater protection for Scotland's most important wildlife sites, for ancient woodlands and for Ramsar sites - wetland sites designated to be of international importance.

It was argued NPF4 should retain or strengthen protection for Wild Land, although concerns were also raised that existing protections act as an effective bar to renewable energy development and that any further protection risks having a detrimental effect upon economic development and social sustainability in some areas.

Locally designated sites were argued important to both the sense of place of local communities and in attracting tourism, with UNESCO Biospheres given as examples of the type of sites that might be appropriate for local designation. It was suggested many of the landscapes most valued by local people in rural Scotland

are designated as Local Landscape Areas or Special Landscape Areas, and that these should be given strong protection from damaging development in NPF4.

The potentially negative impact of high volumes of tourism was also highlighted and it was argued that the infrastructure to support tourism should be prioritised.

The future for rural, coastal and island communities

A balanced population profile with economically active people living in the area was identified as important to sustain rural communities. Housing, employment opportunities and infrastructure for transport, schools, shops, healthcare services, community facilities and digital connectivity were all suggested to be necessary.

With respect to coastal areas, the importance of integration between terrestrial and marine planning systems was highlighted. There were calls for coastal protection including for infrastructure to take account of sea level rise /storm surges and for an emphasis on safeguarding and enhancing coastal ecosystems and the natural protection services they can provide. However, it was also suggested that managed coastal retreats should be considered as the most sustainable approach in some places.

A one-size-fits-all approach to coastal planning policy was argued to be inappropriate for smaller islands where most land would be coastal in character. The need to island-proof NPF4 was also noted.

Unlocking the potential of vacant and derelict land

There were calls for a stronger commitment to unlocking the potential of vacant and derelict land. Adopting a brownfield first policy and strengthening the level of presumption in favour of brownfield development were both proposed while the potential for stimulating large-scale community renewal in some of Scotland's most deprived neighbourhoods was noted. In addition to providing opportunities for development including house building, it was argued VDL sites could provide scope for renewable energy generation or for green infrastructure including parks and allotments.

National Development status was suggested for co-ordination and delivery of priority brownfield sites and clear national targets for the reuse of derelict land were proposed.

What city and town centres might look like

It was suggested that town centres need to evolve away from their traditional retail role into hubs where a range of social, health, cultural and leisure activities are also concentrated. Increasing residential use was also thought likely and a requirement for improved public spaces for social interaction and activity was identified.

Green belts

Those who expressed a view on green belts often commented on their value or the need to protect them. There was sometimes a concern that the integrity of green belts is under threat, primarily from housing development and there were calls for green belt policy to be strengthened with use of brownfield sites prioritised.

An alternative perspective was that green belt policy needs to be reviewed and reconsidered or that, if a particular place or area needs to be protected for specific reasons, the use of a specific landscape designation would be more appropriate. It was argued that land that does not meet green belt objectives should be released for other uses, including specifically for the delivery of homes.

Views were mixed with respect to how prescriptive NPF4 should be in identifying the issues for planning authorities to consider when designating green belts and determining planning applications. Although existing guidance provided by SPP was suggested to be sufficient, it was also thought that more prescriptive advice could be provided in terms of assisting with the designation of green belts. Clarity about acceptable land uses within green belt areas was seen as particularly important.

Getting the most out of productive land

There were calls for a focus on food production, integration of food into the planning system and for greater protection for agricultural land. However, it was also argued that SPP goes too far in protection of agricultural land, especially with respect to land that is not of prime quality.

Protecting and restoring peatland

The important roles of peatland in sequestering and storing carbon, maintaining biodiversity and flood mitigation were all highlighted. However, there were differing perspectives on the priority that should be placed on preserving peatlands, with some respondents arguing that the climate emergency means protecting peatland should not be allowed to hinder the necessary increase in generation of renewable energy. Others thought protecting peatlands should be a National Priority or that there should be a presumption against the disturbance or removal of peatlands. There were calls for an end to commercial extraction of peat from viable or restorable peatland or from all peatlands.

Respondents also pointed to the importance of restoration of peatlands, with suggestions this should increase and that, where possible, peat-forming function should be restored.

Planning blue and green infrastructure

There were calls for a 'blue/green infrastructure first' approach in NPF4, and for blue and green infrastructure to run throughout planning policy in other areas. It was argued that blue/green infrastructure should be placed at the heart of new development and should be integral to a design-led approach. An emphasis on considering green infrastructure alongside basic requirements such as roads and drainage was advocated. There was also support for setting national standards including to ensure green infrastructure provision is applied consistently.

Attention was drawn to the importance of retrofitting green infrastructure and of enabling improvement to existing green infrastructure. The COVID-19 crisis was cited as an illustration of the importance of accessible green spaces to health and wellbeing, and the degree to which such access is limited for those living in some urban areas.

The importance of linking green spaces together to form green networks was also highlighted. These were argued important in reducing habitat fragmentation as well as providing longer distance opportunities for walking or cycling and in linking surrounding neighbourhoods with town centres.

What we can do to protect and enhance biodiversity

It was argued that, in a similar way to climate change, the importance of protecting and enhancing biodiversity should be integrated throughout NPF4. There was also strong support for applying the concept of biodiversity net gain to all development, and principles to guide its delivery were suggested.

Respondents pointed to the importance of woodlands and there were calls for creation of more woodlands, particularly of native species, in both upland and urban areas. The need to protect existing woodland was also highlighted and it was argued there should be stronger protection for ancient woodlands.

The importance of large areas and networks of habitat were also highlighted and there were calls for creation of a Scottish Nature Network as a National Development.

How we can strengthen the character and heritage of our many different places

Several respondents commented on the value of the historic environment to Scotland's sense of national identity and wellbeing. Others highlighted the contribution of the historic environment to a number of wider policy priorities and suggested it could be mainstreamed within planning policy. There was support for current policy approaches and also a suggestion that NPF4 policy on managing the historic environment should be aligned with Historic Environment Scotland's Historic Environment Policy for Scotland.

5. Infrastructure needed to realise our long-term aspirations

Infrastructure that will be needed in the future

There were calls for an infrastructure first approach and for prioritising investment decisions based on their contribution to meeting net-zero targets, in line with the recommendations of the Scottish Infrastructure Commission. Specific infrastructure projects were often proposed as National Priorities or National Developments.

In general, it was argued that a more strategic or joined-up approach is required to ensure infrastructure delivery is less fragmented. The need for alignment of NPF4 with other strategies and for improved collaboration between local authorities, developers and infrastructure providers was suggested. Issues associated with funding were also raised, including concerns with respect to loss of EU funding post Brexit.

Energy generation, transmission and storage

There were calls for NPF4 to recognise that Scotland requires a significant increase in generation of renewable energy if carbon emissions targets are to be met, and it was argued that the planning system should do more to support this. Improvements

to the electricity grid were also suggested to be needed to facilitate more dispersed generation and greater capacity. As well as infrastructure required for electricity from onshore wind, solar and hydro, the need for onshore infrastructure associated with electricity from offshore wind, tidal or wave energy was also highlighted.

Increased capacity for energy storage was also identified as a priority with battery storage and pumped hydro both argued to be important. Co-location of compatible technologies – typically wind, solar and battery storage was suggested.

The need for appropriate infrastructure associated with hydrogen production, storage and distribution was also noted.

Carbon capture and storage infrastructure

Infrastructure to support carbon capture and storage was proposed, including new or refurbished pipelines for transportation of captured CO₂.

Transport and active travel

Improved public transport was seen as key to reducing car use and associated carbon emissions and it was suggested services need to be both of better quality and better integrated. Transport hubs allowing transfer between different modes of transport, including active travel options, were advocated. With respect to active travel there were calls for a better network of good quality footpaths and cycle paths, not only linking housing developments with town centres but also connecting to longer distance paths and cycle routes. A requirement for secure cycle storage was highlighted.

Elements of blue/green infrastructure

It was argued that there should be a blue/green infrastructure first approach, with provision of elements of blue/green infrastructure considered an integral part of the design process for any new development, and with consideration of blue/green infrastructure running throughout planning policy in other areas.

The multifunctional nature of blue/green infrastructure was highlighted with the important contribution to surface water and flood management often referenced. The importance of green space as part of active travel networks was also noted, as was the extent to which green space is an integral element of place, placemaking and sustainable development.

Other infrastructure needed

Other elements of infrastructure suggested to require improvement included:

- Mains water supply and sewerage.
- Road and rail networks.
- Digital infrastructure.
- Waste management infrastructure, including facilities to support development of more of a circular economy.

Making better use of existing infrastructure capacity, including through innovation

Several respondents commented on the Infrastructure Commission's recommendation with respect to making use of existing assets. It was suggested that a whole-life based approach should be a key consideration in the creation of new infrastructure and that there should be a strong presumption for reuse and repurposing over new build.

Consenting repowered onshore wind developments was suggested as an example of making use of existing assets, as was use of the existing canal network as a component of 'smart' water management systems.

Where transport connections will be needed to support future development

There were calls for improvement to both road and rail networks, with works to several individual roads or rail lines suggested to merit National Development status. Increased rail freight capacity and further electrification of freight routes were also proposed, as were improved road and rail connections to both ports and airports.

It was also argued that rather than taking infrastructure to development sites, development should be focused around existing infrastructure – for example building housing near to existing transport hubs.

How digital connectivity could change the way we live and work

The COVID-19 emergency was suggested to have demonstrated that many people can work from home if adequate digital connectivity is provided and that, if sustained, this could reduce the amount of commuting necessary in the future. This could both reduce the carbon emissions associated with transport and also allow people a greater choice of where they want to live.

However, poor digital connectivity in many rural areas was highlighted and it was argued that investment in fixed and mobile digital infrastructure should be supported post COVID-19, recognising its importance as the fourth utility.

Emerging and future technologies we will need to plan for

The future importance of carbon capture and storage was suggested. Also highlighted were the requirements for energy storage, electric vehicle charging infrastructure and infrastructure for use of hydrogen as a fuel for transport.

There were calls for NPF4 and LDPs to take account of emerging technologies and be flexible in how these might be delivered in the future.

People

This part of the report covers Early Engagement Policies under the 'People' heading and includes sections on:

Community facilities

Culture and the arts

Digital connectivity

Green infrastructure

Gypsy Travellers

Health

Housing - Affordable

Housing - General

Housing - Specialist

Waste

Community facilities

Proposed key objective of NPF4: To promote and support the provision of accessible community facilities where a need has been identified in local development plans.

Many of the comments addressed the importance of certain types of facilities and services, including suggesting that the COVID-19 crisis has highlighted the importance of local services. Type of facilities or services seen as important included:

- Health services, including GPs, health centres and chemists.
- Care homes and nursing homes. It was suggested that NPF4 offers an opportunity to consider how planning can influence provision. It was reported that, in light of COVID-19, Health and Social Care Partnerships are already considering new models of care and that NPF4 could help shape the national conversation on this issue.
- Education services, including schools.
- Community centres and public halls.
- Libraries.
- Places of worship or multi-faith spaces.
- Local hubs with office space.
- Shops. Specifically, small scale markets, allowing local food producers a route to market. It was also suggested that the planning system should allow a greater range and coverage of local convenience stores across all communities.
- Banks.
- Restaurants or pubs. It was suggested that planning policy should recognise the role of restaurants and public houses as community facilities contributing to the sense of place, and that developments should not jeopardise them if already present and should be required to provide land to enable them where possible.
- Allotments and community growing spaces. This issue is covered further under the *Green infrastructure* theme.
- Safe play spaces. There was a call for NPF4 to include a recommendation around ensuring that play, recreation, leisure and assembling in public space is at the heart of Scottish planning policy, including by ensuring the use of Play Sufficiency Assessments and Actions Plans. It was suggested that local authorities should have the freedom to determine what 'sufficient' means in their local area.
- Sports facilities, including sports pitches. Further comments included that the loss of any playing fields through change of use needs to be given very careful consideration. The importance of the wider, physical infrastructure of community sport and recreation, combined with the societal arrangements in

place for their usage, was also highlighted. These issues are covered further under the *Health* theme.

- Public toilets. Both rates reductions for premises providing maintained public access to toilet facilities that are not just for customers and an online register of public toilets were suggested. In terms of NPF4 doing more to promote Changing Places Toilets, it was noted that fully accessible toilets require more space, and this should be reflected in Building Standards.
- There were also references to the importance of having access to quality greenspace and green networks, including because of the health and wellbeing benefits to local communities. This is covered further under the *Green infrastructure* theme. It was also suggested that facilities must be easily accessible to all, for example by creating safe streets and pavements, and that active travel infrastructure should encourage safe cycling and walking. This issue is covered further under the *Transport* theme.

In terms of the range of community facilities it was suggested that existing developments that lack such facilities should be upgraded.

Respondents also highlighted the importance of considering particular groups of people when planning community facilities. Suggestions included:

- The ageing population, with the planning system needing to think carefully about how we plan for the needs of older people and recognise the merits of older people's proximity to services.
- Young people, including through providing youth clubs and other facilities for teenagers.
- Women, including in relation to their safety when using public spaces. It was suggested that places that have not been designed to enable access by those with a variety of access needs become inaccessible, including for disabled women, carers, older women, pregnant women, and mothers of young children.

Impacts of new development on existing community facilities

Comments included that NPF4 should require developers and planning authorities to consider the impact of new development on existing community facilities, and any requirement for new facilities that the development may generate. One suggestion was that, wherever possible, new homes should be built within the existing boundaries of towns and villages to allow easy access to existing community facilities. There was also a view that development obligations and conditions should be used to provide facilities if capacity would otherwise be exceeded.

There were also calls for a community-led approach, including by placing a greater emphasis on community priorities as demonstrated by consultation processes. The introduction of the concept of LPPs in the 2019 Act was welcomed and it was suggested that a development's impact on community welfare needs to be considered at the design stage, with local communities engaged in the process.

However, there was also a concern that a plan-led approach does not lead to investment and delivery of building and projects. For example, it was reported that developers have experience of being required to make section 75 contributions towards community facilities that a local authority has subsequently not taken forward under its obligations in the same agreement. It was suggested that NPF4 could take the opportunity to drive a holistic approach to place making which carries through to development and investment decisions.

Other comments included that:

- Authorities should liaise with Community Planners at the LDP stage. Development Management must refer to LDPs and LPPs in the area (and Community plans).
- A settlement first approach should be taken, with a policy criterion for locations outwith settlements that would have to be supported by a statement on locational requirements and a business plan.
- There should be a prescribed set of information contained within settlement statements outlining the impacts of new development on existing facilities and requirements for community facilities. This should be provided in consultation with, for example, NHS Trusts.
- There should be greater consideration of Delivery Programmes and the role they can play, particularly as they are updated annually.
- There could be requirements (similar to those relating to demolition of listed buildings or loss of outdoor sports facilities) to show a building to be demolished is no longer fit for purpose or no longer needed or that the facilities provided will be equivalent or better than the existing facility and, if not at the same site, with a reasonable travelling distance.
- Some community facilities will be provided during the lifetime of an LDP that have not been identified as an allocated site. This could be because planning the community facility project was at an early stage during the preparation of the LDP and the site was not known or had not been secured. Policies should be flexible to allow new facilities to be provided, even if they are not a proposal site.

However, there was also a view that individual local authorities have different standards for the provision of community facilities, and that these standards are a local matter. It was suggested that, if the Government intends to introduce standards for the provision of different community facilities, the initial consideration is whether NPF4 is the best place to consult on and provide these. It was argued that the role of planning is to provide land for community facilities, and that any quantitative standards for the community facilities required are perhaps best considered by other professionals with specific knowledge of the service to be provided.

In relation to the need for planning guidance, comments included that:

- Guidance on requirements for new education and health facilities as a result of new development would be helpful and would help standardise the approach across the country.

- NPF4 should give examples of the types of community facilities to which any requirements will apply.

Rural areas or island communities

Particular issues raised in relation to ensuring that rural and island communities have the facilities they need included that:

- It will be important to define what is rural and sustainable to target provision of community facilities. It was suggested that places that are too remote or locations where there are few job opportunities may be unsustainable.
- The school catchment area could help with identifying the catchment of a rural area.
- There are areas with a track record of community land owning and enterprise trusts being the main developer of a range of developments including community facilities. There is scope to share and showcase good practice.
- For remote non-linked islands, an approach that co-locates facilities so that limited resources can be pooled, through a community hub type approach, could be looked at.

Other issues

Other issues raised included that:

- To ensure community facilities are resilient to the impacts of climate change, facilities, including refuse facilities, should not be built in areas at risk from flooding.
- There is a need for a national planning policy on cemeteries and crematoria. An alternative view was that, while a separate policy on cemeteries is not required, NPF4 could clarify the remit for LDPs to consider the need for additional facilities and allocate land for these where necessary.

Culture and the arts

Proposed key objective of NPF4: To recognise and support the contribution of cultural activities to individual, community and national wellbeing and prosperity, including the protection of existing culture and live music venues by ensuring that applications for new developments include sufficient measures to mitigate, minimise or manage any noise so that existing users do not have restrictions placed on them as a result of development permitted after they were established.

Respondents referred to the current social, civic and economic benefits of culture and the arts, with the Culture Strategy for Scotland⁶ cited as a pointer to wider policy outcomes for culture and the arts. It was reported that it confirms the role culture and the arts can play in improving individual mental health, general wellbeing, self-confidence and resilience. With respect to planning policy, it was suggested that this can support cultural activities in less affluent areas, including creating opportunities for connection for people of all ages.

The current contribution to the economy of cultural activities was highlighted, as was the potential for further economic growth. The importance of the built environment and infrastructure was noted, especially as some venues are themselves heritage assets. It was also noted that spaces that facilitate high-quality cultural activities will be increasingly important for communities if remote working becomes more prevalent. It was suggested that NPF4 can offer support for local arts and culture that will also help sustain town centres as the retail market changes.

There was support for the Agent of Change principle and protection for venues from the threats posed by commercial development, including residential house building. One respondent commented that guidance and greater definition would be helpful. Another suggested that new venues do not need a stand-alone policy, as the issues covered by the principle are already addressed in current planning policy and taking into account the financial impact for culture and arts venues could make it difficult not to apply this to other developments. There was also a view that the current policy principles for the historic environment should be retained as these refer to cultural landscape and cultural identity.

In relation to issues for rural areas, arts and cultural activities were seen as creating an overall sense of place, in addition to attracting tourists. It was suggested that engagement in culture activity was especially useful in helping people combat loneliness and isolation in rural locations, for example through providing opportunities to volunteer. There was also an observation that in rural and remote communities there is a greater likelihood of culture/arts, health and other community facilities being co-located, supporting the wider needs of the population.

Specific proposals for NPF4 included:

⁶ Available at: <https://www.gov.scot/policies/arts-culture-heritage/culture-strategy-for-scotland/>

- NPF4 should include policy specifically supporting and promoting the arts and culture within planning policy and decision-making. This could include the Agent of Change principle and translate what is within the 2019 Act into policy; equally an Agent of Change policy could be discussed within wider design content.
- Culture should be embedded within national and local planning policy, as it contributes to sustainable economies and the overall health and wellbeing of the community, but LDPs should have the flexibility to respond to local circumstances. Other views were that cultural provision should be a duty for councils in their LDPs or must at least be considered when drafting LDPs and other local planning policies covering housing and other infrastructure.
- NPF4 and the vision and ambitions of the Scottish Government's Culture Strategy should be aligned, with culture seen as central to wider public policy outcomes and considered at the early planning stages of service provision.
- The provision of cultural facilities should be a key driver of town and community planning policy and development, to support wellbeing, increase economic activity, repurpose vacant spaces and to strengthen town centres.
- Planning policies on wellbeing should include cultural wellbeing, alongside physical and social wellbeing, especially when considering smaller towns and more rural communities.

Digital connectivity

Key objective of NPF4: To support the roll-out of digital infrastructure across Scotland so that the social, economic and environmental benefits of digital technologies are delivered in a way that keeps environmental impacts to a minimum.

Comments often focused on digital connectivity in rural areas, including the need to bridge the digital divide, caused by the disparity in digital connectivity between rural and urban areas. The implementation of the Shared Rural Network programme was seen as one way of tackling this divide, and it was also argued that development of the Digital Fibre Network, designated a National Development in NPF3, should continue as a National Development under NPF4.

Improving digital services in rural areas was considered important in supporting the growth of current businesses and attracting new ones, potentially through relocation from urban areas, with resulting job opportunities and support for local economies – such as tourism and schools, shops and restaurants. It was noted that connectivity in rural areas could also help reverse depopulation and the drift to urban centres (especially of younger people) and encourage a greater diversity of population. On a connected point, it was noted good connectivity supports remote working and reduces commuting. These changes were observed as contributing positively to climate change targets, by reducing travel times and CO₂ emissions.

It was acknowledged that significant investment is needed to create a level playing field across Scotland, for example by providing ultra-fast broadband for businesses in rural areas. The issue of balancing operational infrastructure needs against environmental considerations in rural areas was highlighted.

It was noted that COVID-19 is leading to a 'new normal', with widespread use of many of the practical applications of digital connectivity likely to continue post-crisis. Various aspects of home and work life supported by digital connectivity were cited by respondents including:

- Home working/video conferencing.
- Education/online learning.
- Telehealth, with online consultations avoiding lengthy travel times to the nearest hospital.
- Online shopping and entertainment.

Others acknowledged that improved digital infrastructure, supporting fixed and mobile communications across all communities, is a necessity for Scotland's future resilience.

Mobile and digital connectivity, part of the Critical National Infrastructure, was seen as essential to the current and future delivery of frontline services (for example the NHS and other response services). It was noted that the 'Internet of Things' will include telehealth, connected ambulances, video-call medical appointments,

greater use of just-in-time services for industry and ‘smart’ infrastructure (for example smart motorways and buildings). It was observed that systems should be adaptable and suitable for future technological changes and it was suggested that digital development should be community-led in rural areas, with communities able to own and manage digital systems. There was also a view that digital platforms could also be increasingly used to facilitate community engagement exercises.

Comments addressing the role of NPF4 and future planning policy in relation to digital connectivity included that:

- Digital connectivity should continue to be strategically important within the planning system, supporting the development of digital infrastructure across Scotland. NPF4 should support the improvement of existing mobile networks and the delivery of 5G, with this reflected in local planning systems. Connected devices and services require a high-speed mobile comms network which should be rolled out quickly across all areas, not just city centres, as this will help tackle multiple deprivation.
- NPF4 should consider the Digital Scotland Superfast Broadband programme and align to Scottish Government’s stated aspirations on connectivity and 5G contained in current digital strategies.
- Digital development should be future-proofed and potentially delivered on a ‘rural-first’ basis. Developments should ensure equal coverage across Scotland, addressing ‘notspots’. Investment in fixed and mobile digital infrastructure should be supported post COVID-19, recognising its importance as the fourth utility.
- Redevelopment of existing communications infrastructure and need for new infrastructure should be addressed, with environmental considerations (including the visual impact of taller masts, where required by geography) balanced against social and economic benefits from improved mobile coverage. The retrofitting of infrastructure should be addressed, for example in conservation areas.
- NPF4 should encourage local planning authorities to engage with mobile network operators and ISPs to help facilitate the new 5G infrastructure – ideally by using the operators’ Code of Best Practice.
- Local planning authorities should be pragmatic and understanding of the constraints of telecoms infrastructure – telecoms services will be needed across all parts of Scotland including conservation areas, national parks and areas of greenbelt. Local planning authorities should consider the impact of new homes and business development on existing digital comms infrastructure.
- New build housing should have digital infrastructure included as an integral part of the development, as should business premises. This will future proof digital accessibility and maximise connectivity for all socioeconomic groups.

Green infrastructure

Proposed key objective of NPF4: To protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking.

Benefits of green infrastructure

There were many references to the benefits of green infrastructure including, but not limited to:

- Providing a carbon sink or otherwise contributing to climate change targets.
- Contributing to surface water management and flood management.
- Enhancing biodiversity, providing wildlife corridors, reducing habitat fragmentation and restoring ecosystems. The value of green roofs/walls was referenced. The importance of incorporating a Nature Based Solutions approach to policy development was suggested.
- Improving the quality of places and as an integral element of place, placemaking and sustainable development.
- Improving health and wellbeing.
- Connecting new neighbourhoods to adjoining communities and providing opportunities for social interaction and cohesion.
- Providing communal space, play space, and active travel opportunities.
- Improving air quality or water quality.
- Providing growing space, including for local food production.
- Creating opportunities for generating renewable energy.
- Knock-on positive effects for local economies and sustainable economic development.

The particular importance of green space in areas of deprivation was also highlighted and the potential for its contribution to narrowing health inequalities was noted.

Several respondents highlighted the central position they felt green infrastructure should occupy in NPF4 with suggestions including that it should be recognised as an important development type in its own right, that there should be a 'blue green infrastructure first' approach, and that green infrastructure should run throughout planning policy in other areas. It was argued that the multifunctional nature of blue green infrastructure should be emphasised, and that it should be placed at the heart of new development and integral to a design-led approach. An emphasis on considering green infrastructure alongside basic requirements such as roads and drainage was advocated.

Respondents also drew attention to the importance of retrofitting and of enabling improvement of existing green infrastructure. The current public health emergency was cited as an illustration of the importance of accessible green spaces and the

degree to which this is limited for those living in some urban areas, particularly in flats. It was suggested that some older social housing developments have little green space.

It was also observed that, in some instances, elements of infrastructure that already exist in their own right may be integrated into development proposals, while protecting their cultural significance. It was suggested that, if sensitively managed, canals can add to a sense of place and provide active travel corridors.

With respect to new development it was noted that provision of green infrastructure may be hard to enforce if developers argue that there are viability issues, and the possible conflict between provision of affordable homes and provision of green space was noted. Some respondents argued that green infrastructure should be given equal priority to affordable homes or should be at least equal to other important priorities. It was noted that minimum requirements for open space have the potential to conflict with minimum density policies, and encouraging higher density residential development in order to provide larger areas of useful, multifunctional space were suggested. It was also argued that quality, usable open space and play areas could have a much higher value to a community than a larger area of unused green space.

The importance of linking green spaces together to form networks was also highlighted with one suggestion that there should be powers to connect green networks outwith development sites, potentially over land in different ownership.

Status as a National Development was proposed for:

- A new Scottish Nature Network.
- A new National Green & Blue Infrastructure Network.
- The Central Scotland Green Network, already an NPF3 National Development.

At a more local level, suggestions included the importance of a high-quality green network linking surrounding neighbourhoods with town centres, including to provide better opportunities for cycling.

The importance of paths as elements of green infrastructure was noted, including as connecting open space within settlements to core paths and then to wider access routes. However, it was also argued that there are few core paths and that many are not fit for purpose as they do not ensure safe travel. At the same time, it was reported that other frequently used footpaths and tracks have no protection in planning law, and it was argued that safeguarding such paths should be considered in planning applications.

Planning process

It was argued that the broad definition of green infrastructure set out in the 2019 Act should be used in NPF4 to ensure it captures the full range of potential benefits. The 2019 Act was also noted to require councils to produce Open Space Strategies, and that this may be helpful with respect to maximising the benefits of green infrastructure. It was also suggested that inclusion of key locations for green

infrastructure in forthcoming RSSs and Regional Land Use Frameworks would help to ensure coordinated action and prioritise land use changes.

Other suggestions included that:

- Consideration should be given to a requirement for green infrastructure plans at either settlement, local authority or regional level.
- Specific opportunities for the protection and enhancement of green infrastructure could be identified in LDPs or planning guidance.
- Recognising the different roles that open space has is important and should form part of the requirements for evidence base in the LDP process.
- Planning proposals should be required to demonstrate how they maximise opportunities to enhance green infrastructure through their layout and design.
- Open space should be phased in accordance with the masterplan's phasing of homes and this should be set out in planning conditions.

It was acknowledged that major development proposals provide the most significant opportunities for improvements in green infrastructure and it was suggested NPF4 could include specific policies for major developments, requiring developers to demonstrate how opportunities have been maximised.

There were also comments on funding arrangements, including that the planning system should make better use of developer levies to provide for green infrastructure. Developer contributions to offsite infrastructure or the wider green network were suggested in situations where there is already sufficient open space available locally. It was also suggested the right to off-set inclusion of green space through financial contributions should be removed. Existing pressure on council budgets for maintenance of green space was noted and it was argued that ongoing funding for maintaining additional spaces will be necessary.

National standards

There was support for setting national standards including to ensure green infrastructure provision is applied consistently, although it was also argued that NPF4 should drive delivery as well as providing coherent policy.

Specific suggestions included:

- Exemplar Green Infrastructure policies⁷ produced by the Central Scotland Green Network Trust and the Glasgow & Clyde Valley Green Network Partnership could provide an appropriate template for adoption by all local authorities.
- Consideration should be given to the use of an accreditation scheme such as Building with Nature.⁸

However, some flexibility was also proposed since requirements will vary by settlement location, size and type. In addition, it was suggested local authorities

⁷ Available at <https://www.gcvgreenetwork.gov.uk/publications/792-planning-for-green-infrastructure>.

⁸ For details see <https://www.buildingwithnature.org.uk/how-it-works>.

should have the ability to influence standards and requirements given the responsibility for maintenance of sites under section 75 agreements.

Allotments and community growing spaces

Suggestions of ways for NPF4 to support allotments and community growing places included by raising their profile and by making clear their potential contribution to other policy objectives including placemaking and health and wellbeing. It was argued that provision of allotments or community growing spaces is particularly important in areas of denser development, and that provision within existing communities is as important as for new developments. It was suggested provision could be made mandatory unless no local need is identified, and also that increased demand is predicted in the aftermath of the COVID-19 pandemic.

Other points with respect to the planning system included that:

- RSSs and LDPs could identify land suitable for food production in urban and peri-urban areas.
- The planning system could be used to support delivery of the Good Food Nation objectives⁹.

The importance of community involvement in setting up growing schemes was also highlighted, with a proposal that funding and support should be provided in line with the Community Empowerment (Scotland) Act 2015. The need for a collaborative approach allowing provision to be tailored to suit the requirements of individual communities was highlighted, and an example of robust, weather-resistant community growing facilities being provided through community land ownership and community organisations was cited.

Other suggestions included that sites should be accessible by foot and bike, with limited vehicular access for offloading, and that suitable sites require maximum sunlight.

Using derelict land, parks and unused golf courses to provide growing spaces were all suggested, as was a larger land area around each house to enable food planting by households.

The value of integration of urban forestry into green networks was also highlighted and noted to have benefits including potential for creating local employment opportunities and providing a supply of local timber and fuel. There were calls for both the protection of urban trees and for increased tree planting, including water course catchment tree planting. An edible strand to Forestry and Woodland Strategies was also proposed.

⁹ Available at <https://www.gov.scot/publications/recipe-success-scotlands-national-food-drink-policy-becoming-good-food/>

Safeguarding areas providing flood risk management services

Many respondents cited improved flood management as a benefit of green infrastructure or referenced the benefits of SuDS. Specific suggestions with respect to the latter included that:

- NPF4 should establish a clear link between green and blue infrastructure, flood risk management and SuDS.
- Development plans should incorporate Urban Flood-sensitive Zones where SuDS and other blue-green infrastructure are mandatory.
- Sustainable drainage should receive greater emphasis than grey infrastructure in the management of drainage from new development, and potential for waste-water recycling should be considered.
- Ownership/management of SuDs should be addressed since mixed ownership impacts on effectiveness, quality and monitoring of effectiveness.

The contribution that can be made by historic assets was also highlighted in the form of the North Glasgow Integrated Water Management System 'smart' canal, formed across seven local authority areas. It was reported this includes infrastructure projects addressing flood alleviation, river water quality improvement, and environmental improvement schemes.

There was support for safeguarding floodplains, with a suggestion this should be a National Priority. Other comments included that:

- The most up-to-date climate change allowances should be used to define functional floodplains.
- Areas where development should be prevented could be mapped as protected in LDP settlement statements.
- Opportunities to improve floodplains through new development should be highlighted.
- SEPA Flood maps need to be kept up to date.

Gypsy/Travellers

Key objective of NPF4: To ensure that the current and future accommodation needs of Gypsy/Travellers are met so that they are provided with access to good quality, safe and appropriately located sites.

A relatively small number of respondents commented on Gypsy/Traveller accommodation. There was support for the proposed key objective of ensuring that current and future accommodation needs of Gypsy/Travellers are met so that they are provided with access to good quality, safe and appropriately located sites. It was reported that Gypsy/Travellers in Scotland experience low health outcomes which are often related to the siting and quality of the places where they live, and that they experience systemic barriers to engaging with planning.

It was suggested NPF4 should address this matter as a National Priority while also recognising the proactive work done by some local authorities to address these issues. One view was that the new framework should facilitate the creation of Gypsy/Traveller negotiated stopping sites and transit sites in every local authority area as a minimum. It was suggested that the framework should reference the work of PAS around Gypsy/Traveller communities.

However, a small number of local authority respondents reported there has been very limited or no demand in their area previously, and no recent evidence to support the provision of permanent sites. Further comments included that

- They will continue to support Gypsies/Travellers on an *ad hoc* basis as any requests arise, being fully aware of the human rights and associated equalities issues.
- Travelling Showpeople visit the Islands infrequently and visits are pre-arranged and of short duration, allowing appropriate ground to be designated as temporary show sites in line with local planning policy.
- Any approach should be evidence based and allow a flexible policy approach which recognises that a site-based response may not be appropriate.

Other respondents also commented on the need to take an evidence-based approach, with comments including:

- As recognised in the Early Engagement Policy Paper it has become clear that since 2014 the recording of the Gypsy/Traveller population has been inaccurate and that measurements appear to have underestimated the level of demand. Therefore, whilst the requirement may be clear, a lack of reporting of demand is a likely reason why there has been little delivery in providing new accommodation.
- It will be important to identify those who have experienced challenges related to previous planning policy, such as Gypsy/Travellers, and to take steps to ensure that NPF4 meets their needs.
- Consideration needs to be given to whether the current HNDA approach is fit for purpose in identifying the housing needs of Gypsy/Travellers across

Scotland. A national co-ordinated approach within NPF4 to build an evidence base to understand travel patterns and the need for site provision across the country would be the most appropriate approach to meeting the needs of these communities. The nature of Gypsy/Traveller demand means that more investigative, qualitative and empirical methods are required. This work may therefore be more appropriate at a national level with collaboration with regional and local stakeholders.

- Mapping could be used to ensure the identification of public sites that would meet the need of the Gypsy/Traveller community. It should allow for the identification of privately owned sites that would meet needs, even if these are in unexpected locations.
- Mapping transit routes would be positive and would be useful information for the preparation of RSSs and LDPs. However, this would only help to ascertain demand for transit sites and the NPF should be more explicit in setting out the different types of Gypsy/Traveller demand, and subsequently the different types of provision and solutions that will be required to meet that demand.

It was noted that there are existing sources of information setting out standards and guidance, such as the guides provided by PAS and the policy work by COSLA, that local authorities have been able to feed into the preparation of LDP policy. However, it was reported that applications are still regularly being refused. It was suggested that while the formalisation of criteria through NPF4 will be helpful in setting out clear requirements and, perhaps more importantly, providing status, awareness raising and 'myth-busting' will also be required to ensure that the proposed objective is achieved.

Other suggestions included that:

- Planning legislation already requires that LDPs address any identified need and it was suggested that NPF4 need only adopt this as a requirement to be shown in LDPs.
- The PSED, specific duties, 'Fairer Scotland' duty and a participative approach should inform consideration of Scottish Gypsy Traveller sites in LDPs.
- NPF4 should include guidance on the requirement for Gypsy/Traveller sites, based on available evidence of which planning authorities can make use.
- Guidance must be informed by the Gypsy/Traveller community themselves. It must be flexible enough to take into account different needs and beliefs of different families and communities.
- It may be best that guidance provides matters to consider rather than a set of criteria.
- To accommodate any emerging need, NPF4 should include criteria to support proposals that come forward.

With regard to site identification and/or acquiring permissions, comments and suggestions included that:

- Not all local authorities own sufficient land or land in the right places that can be used for public sites. NPF4 should account for LDPs that are unable to identify sufficient appropriate sites.
- With a shortage of sites across Scotland it would be inappropriate to not allow for windfall sites. Policy criteria for these sites is essential to guide applicants when making applications and ensure pertinent matters are taken into account in planning decisions and help limit consideration of non-material matters.
- Small sites (which should be defined) would still benefit from guidance to make the planning process straightforward for both applicants and decision-makers. Smaller site requirements should be proportionate to the scale of the site.
- A criterion set at a national level could provide clarity to the Gypsy/Traveller community who require sites across multiple planning authority areas and would benefit from greater consistency in policy advice.
- With regard to transit sites without planning permission and a licence, the planning system restricts the time and number of caravans on a site, regardless of how suitable it is. A change in regulation or legislation such as through permitted development rights would be required to make this easier.
- It should be recognised that resources are required for acquisition and setting up of sites as well as for the consultation involved in assessing need and identifying the most appropriate sites.

There were also suggestions relating specifically to privately owned sites, including that:

- There should not be an assumption that all need can and will be met through public sites. There needs to be a flexibility to have a policy criterion for privately owned sites to make up the shortfall.
- Privately owned sites should not have to prove need as they are set up by the Gypsy/Traveller community and therefore control over issues such as operating times during the year may be unreasonable. However, this should apply only to sites set up by the Gypsy/Traveller community rather than a landowner looking to set up a site for a permanent residential caravan park.

Finally, there was specific reference to the issues Scottish Travelling Showpeople have faced over the last 30 or so years regarding forced relocations and the segmentation of Showmen's Yards in areas of multiple deprivation. It was reported that many Showmen's Yards are routinely denied permanent planning status despite the vast majority of Showpeople residing in permanent sites. Suggestions included working with the Scottish Showmen's Guild and other members of the community, including around:

- Introducing special provisions for 'buffer' zones: This would be special planning status where Showpeople could own yards which straddle residential and business use.
- The sale of individual plots and community owned sites.

Health

Key objective of NPF4: To ensure that planning policies and decisions take account of the health needs of local communities and have regard to the need to improve the diet, health and wellbeing of people living in Scotland.

Comments under this theme were sometimes extensive and/or far reaching. Key issues raised are summarised below and the relevant Scottish Government policy team has access to all responses.

In terms of the wider reach and significance of the planning and health theme, it was suggested that planning can affect quality of life and wellbeing in many ways, including as part of Scotland's whole system approach to health improvement. Connections were made to the health and wellbeing impact of other planning themes, including green infrastructure and having access to greenspaces and nature, sustainable transport and promoting and enabling active travel, and housing.

In terms of other aspects of health capable of being influenced by the planning system, suggestions included:

- Accessibility to buildings and spaces for those with physical/cognitive disabilities.
- The extent to which health and social care services, and decisions over how and where they are delivered, have a major impact on women.

Placemaking and tackling inequalities

It was also noted that place, in particular, can play an important role in public health and is recognised in the first of Scotland's six public health priorities: "A Scotland where we live in vibrant, healthy and safe places and Communities". It was suggested that the Scottish Planning system has been progressive in its acknowledgement of place's influence on the health outcomes of society in recent years. NPF4 was seen as providing an opportunity for the planning system to define and support further the attainment of desirable social and health outcomes within planning policy and applications, and to align the development process with wider aspirations for better wellbeing outcomes.

A range of aspects of a place that can nurture health and wellbeing were identified, including the availability of services and amenities, feelings of safety, a sense of belonging and a sense of control, and thriving communities with an abundance of local businesses and good access to job opportunities. Negative aspects identified included high traffic volumes, poor air and noise quality and poorly maintained streets and public space. It was suggested that these positive and negative aspects of places vary in impact depending on the specific setting, socio-economic status and the characteristics of population groups, including ethnicity, disability, gender, sexual orientation, age and sex.

Recommendations made in relation to NPF4's role in influencing place to nurture health and wellbeing included that it should:

- Include a national statement on place, its impact on public health and its role in whole system reduction of inequalities.
- Define the connections between place and health and require all planning policy to explicitly describe how it contributes to improving health and wellbeing, based on evidence available.
- Set out the relationship between planning decisions, the processes that shape these decisions and their impact on place, health and inequalities. In particular, encourage decision makers to be fully informed of the implications that planning decisions have on health and health inequalities in the short, medium and long term and how decisions affect the achievement of Scotland's public health priorities.
- Establish a set of health and place themes that define a Scotland-wide approach to what needs to happen for every place to play its part in keeping Scotland's people healthy. These themes should be based on those in the Place Standard and embedding them into NPF4 will strengthen links between community-identified needs and the strategic approach to planning decision-making. The suggested themes were: Community engagement and empowerment; Equity and sustainability; and Improved efficiency.
- Articulate, define and give national policy support to a range of health and place themes constructed around: movement (moving around, public transport, traffic and parking); spaces (streets and spaces, natural spaces, play and recreation); resources (services and support, work and economy, housing and community, social interactions); civic (identify and belonging, feeling safe); stewardship (care and maintenance, influence and control); and underpinning (equitable outcomes for all, climate change, sustainability and biodiversity).

Other suggestions included that NPF4 should:

- Support HIAs by giving guidance on the general parameters of an HIA and what should be included, in the same way that guidance is provided by key agencies with respect to Environmental Impact Assessments. This guidance should be co-designed with Planning Authorities.
- A planning development should only be approved if it passes a future generations health and wellbeing test (this could be part of a public interest test). An example public interest test is set out in the Wellbeing of Future Generations Act (Wales) 2015.

Other issues about placemaking are covered further at that theme.

Strategic links and evidence

It was suggested that NPF4 could encourage closer collaboration between national and local planning processes, and there was an associated recommendation that NPF4 includes a stand-alone planning, health and inequalities section to clearly explain the concepts and links to the range of national strategies and plans.

The other national policies and strategies identified as relevant, and which NPF4 could have a role in achieving included: the National Transport Strategy; the Active

Scotland Delivery Plan; the 2030 Vision for Active Travel; the Cycling Action Plan for Scotland; the National Walking Strategy; the Active Travel Framework; the Play Strategy for Scotland: Action Plan; Early learning and childcare expansion; A healthier future: Scotland's diet and healthy weight delivery plan; Scotland's Mental Health Strategy 2017-2027; the Health and Social Care Delivery Plan; and A Culture Strategy for Scotland. There were also references to:

- Local outcomes improvement plans and locality plans.
- LPPs.
- Annual delivery planning across NHS boards and HSCPs.

Overall, it was suggested that consideration of health, equity and sustainability should be mandatory rather than optional and that NPF4 should require decisions to be based on the best available evidence, including community health profiles developed using tools such as the Scottish Public Health observatory on-line profile tools, and community engagement.

In addition to the importance of engaging with communities, it was suggested that consideration be given to making Public Health Scotland a statutory consultee on LDPs and a consultation authority on SEAs.

Developments and sufficiency of health care services

Ensuring access to key local services, including health services, was reported to be a fundamental principle of planning for health. In terms of approach/factors to be taken into consideration, comments or suggestions included that:

- The use of good evidence about current and future demographics and existing and predicted health and social care need (such as that available from National Records for Scotland and the Scottish Public Health Observatory) is essential.
- The characteristics of new and/or existing communities are important, especially when developments will be targeted at specific demographics such as older people, families, or people in a particular income bracket.
- An intergenerational approach to planning should be taken.
- NPF4 should help with enabling the planning of services and infrastructure that ensure inclusion in terms of access to services across whole regions.
- Local Health Boards should be consultees during the SEA process for housing proposal sites and should be able to give advice on whether there are sufficient health care facilities in the area or if more are required as a result of the development. Where a major housing development application is received which was not identified as a proposal site within the LDP then the health board should be a consultee for the planning application so advice on healthcare facilities can be provided.
- NPF4 should consider how new technology may impact on the nature and delivery of health services.

It was also noted that the issue is not only about new developments and that access to health services, as well as social care, must be considered in the context of planning for community amenities in general.

In support of coherent spatial and service planning, and to allow provision to be planned to avoid increasing the strain on existing services, it was suggested NPF4 establishes closer collaboration between national and local planning processes, Health Facilities Scotland, Estates Management in each of the NHS Boards, private contractors (GPs, dentists and opticians) and private health providers.

Mental health and wellbeing

The connection was sometimes made to good places supporting good mental health and wellbeing. It was suggested that, if good spatial planning processes are not delivered, there is a risk of resultant poor social, physical and economic environments, leading to increased risk of poor mental health and widening health inequalities. Other comments included that:

- There is good evidence that, independent of physical activity, high quality green space contributes to mental wellbeing at both individual and community level.
- It will be important to ensure that communities can make a difference on their own terms, which requires devolving more power to them. This means that rather than having a complex system in which communities must be 'educated' to participate, planning processes should be agile and responsive enough to work with diverse and complex communities with different circumstances and priorities to help and support them to flourish. This should include rural communities.

Diet and obesity

A number of respondents commented on the importance of creating environments that enable healthy food and physical activity behaviours for everyone.

It was reported that addressing the obesity crisis is complex and requires a multi-faceted approach that makes connections between policy areas, different levels of government, and the public, private and third sectors. The important role planning plays in helping to shape neighbourhoods, towns and cities to increase the opportunities for physical activity as well as tackling the availability of foods and drinks that are high in fat, sugar and salt was highlighted. It was suggested that NPF4 provides a unique opportunity to create healthy weight environments that can have a positive impact on the health of the nation.

It was noted that the planning system can have a huge influence on how we access food and what type of food we access. The many ways planning can influence the food system were highlighted, for example by determining the location of food growing or manufacturing areas, supporting distribution and transport systems or influencing the location of retail and out-of-home food sources. It was also noted that planning can support access to healthy, nutritious food (as opposed to foods high in fat, sugar and salt) in easily accessible retail and out-of-home premises in or near local communities.

Further comments or suggestions included that:

- NPF4 needs to acknowledge the need for fewer fast-food outlets and more investment in affordable healthy food, support for families for easy home cooking and that new permissions should have accredited levels of 'green' operations.
- NPF4 should require local authorities to consider health impacts when considering fast food takeaway applications. Planning decisions over changes of use of commercial premises or establishment of new ones have a role to play in promoting healthy food environments and NPF4 could consider how national policy can support planning authorities in implementing this role.
- NPF4 should support a healthy, safe and accessible food retail and catering environment, particularly in the vicinity of schools and in deprived areas. This should include preventing over-provision and clustering of hot food outlets and could involve exclusion zones for particularly sensitive areas such as around schools.
- Planning policy should consider how it might improve accessibility to healthy food and enhance opportunities for food growing in communities, for example through the incorporation of food growing spaces into plans for new and existing building developments.
- Better guidance is needed to help both planners and communities to identify the sorts of development that could damage health, including food outlets, licensed premises and off-licenses, betting shops, etc.

One perspective was that embedding the themes in the Place Standard into NPF4 will strengthen links between community-identified needs and the strategic approach to planning decision-making. It was suggested that embedding the themes into national policy will also inform a consistent approach for local placemaking policy and implementation and would generate a more informed picture for communities and organisations to jointly identify and prioritise local actions and investments.

Noting their understanding that the Place Standard tool is currently being considered as the most useful mechanism for integrating health and place issues within NPF4, one respondent cautioned against the wholesale transference of the themes alone, including because at the time of development of the Place Standard understanding of the complexity of the food system and the concept of "food environment" were not fully developed. They went on to report that the Town and Country Planning Association in England has completed a significant amount of work in linking planning and health and suggested their document "Planning Healthy-Weight Environments"¹⁰ should be used as a source of material for NPF4 content.

¹⁰ Planning Healthy-Weight Environments. A TCPA reuniting health with planning project. Available at https://www.london.gov.uk/sites/default/files/osd53_planning_healthy_weight_environments.pdf

Physical activity and sport

Issues were raised about the physical infrastructure of community sport and recreation in Scotland, combined with the societal arrangements in place for their usage.

It was reported that, while policies to protect playing fields have largely worked, it is important not just to protect facilities but to widen access and usage as well, and to ensure the facilities that exist match the health and wellbeing needs of the communities they serve. One respondent reported research they had commissioned to have revealed a growing 'divided sporting nation' with those in lower socio-economic groups becoming more estranged from regular activity and those in higher groups taking part in more activity.¹¹ The increasing costs of accessing facilities, both in terms of travel and usage, was identified as a key barrier to participation. It was suggested that there are past examples of national planning covering sport as a subject, and that there are sustainability and health-related justifications for taking such an approach.

Other suggestions included:

- Providing realistic options for active travel as a first choice can lead to higher levels of physical activity and improvements in health.
- For sport and physical activity, having an evidence base of what an area currently has as part of the LDP process. This could then link to the aim of better planning generally for infrastructure needs.
- For new development, there are many good examples of where new places for sport and physical activity have co-located with other facilities. Taking a place-based approach to planning enables the needs of an area to be considered in an integrated way, and strengthening this requirement makes sense given the ongoing challenges for public spending.

Climate change and air quality

It was suggested that climate change is a major threat to health and is also a threat multiplier in that existing social, environmental and economic stresses are likely to be exacerbated, particularly for the most vulnerable in society with fewer resources to cope. This issue is covered in greater depth at the *Climate change* theme, but some of the further health-related points made included that:

- Planners can help by reducing levels of harmful transport and industrial emissions through encouraging the switch to cleaner energy sources and providing infrastructure that enables active travel.
- The linkages between clean forms of energy generation and the health benefits of cleaner air should be explicitly stated in NPF4.
- Natural materials and biophilic design¹² have been proven to provide greater wellbeing and natural materials give off less or no volatile organic compounds.

¹¹ Sport Participation in Scotland: Trends and Future Prospects.

Available at: <https://www.oss.scot/spsreport2019/>

¹² Biophilic design is used to increase occupant connectivity to the natural environment through the use of direct nature, indirect nature, and space and place conditions.

It was suggested that poor air quality and poor ventilation in modern houses is one of the reasons for increases in asthma and allergies.

- NPF4 should support Air Quality policies around Low Emission Zones.

Mine gases

In relation to how the planning system should ensure that health issues around mine gases are taken into account and addressed, comments included that local authority decision-makers and communities need to be assured that issues covered by relevant regulatory regimes can and will be adequately addressed.

Suggestions included that:

- Thorough health impact assessments should identify risks to health posed by any development, including former mine workings.
- The planning system should ensure full consultation with Contaminated Land Officers on mine gas matters. Where more specialist knowledge is required consultations should extend to the Coal Authority, SEPA and other local authorities.
- Evaluation of the risk at a site should include a wider area review and be supported with detailed conceptual site models. Adequate environmental monitoring should be carried out in line with the available guidance and development should not proceed until a suitable remediation scheme has been agreed.

COVID-19

It was suggested that the pandemic has highlighted the importance of place to support safe physical distancing and the need to develop healthy, sustainable places that support longer term recovery. NPF4 was seen as offering an opportunity to strengthen national and local planning policies to support such mitigation measures and to create places and communities that are more resilient to any future, similar events. Related recommendations included that:

- NPF4 should clearly articulate the future roles of planning legislation, policy and delivery for improved pandemic preparedness. These considerations should be designed around the global lessons learned from the current situation.
- The Scottish Government should convene a Place and Wellbeing Stakeholder Group to enable an ongoing collaborative approach to embedding support for health and wellbeing outcomes within planning policy and link up the role of NPF4 in whole system recovery from COVID-19.

Other issues

Other issues or suggestions raised included that NPF4 should give full consideration of the extent to which noise generated by any strategic enhancement works at Scotland's airports will affect the health and wellbeing of communities, including when considering possible National Developments.

Housing - Affordable

Proposed key objective of NPF4: To maintain the existing policy support for affordable housing provision. There is a lack of evidence that the policy is failing to deliver affordable homes, taking into account accelerated delivery in recent years and the success of the More Homes approach.

There were general statements of support for either the proposed objective or the continuation of policy support for affordable housing provision in NPF4. It was suggested that housing need and demand is outstripping supply and that there is a clear need for new social and affordable homes across Scotland.

The shortage of available affordable housing, and the subsequent social and economic repercussions, were seen as critical to the health and wellbeing of the individuals and families affected, while it was suggested that the housing system is broken with house prices unaffordable to the young and those on average incomes. It was reported that 1 in 5 children living in poverty are living in poverty solely because of housing costs and that while this happens across all tenures, one of the best ways to tackle the issue would be to have more social rented housing. The need to look at priorities for different groups under the Child Poverty Act and identify if affordable housing meets the needs of those who most need it was highlighted.

Other general comments included that investing in affordable housing generates significant benefits for the economy. Ensuring that investment can be realised in rural areas, including to support local employment and skills development, was seen as critical and worthy of support from planning policy.

However, other respondents noted that they could not agree with the objective as proposed, with reasons given including that SPP should be clearer in its support for affordable housing through a percentage contribution approach (discussed below).

A number of comments addressed what is meant by affordable housing. It was suggested that NPF4 should include a clearer definition of what constitutes affordable housing. Specifically, it was suggested that more work might need to be carried out around what equates to being 'affordable' from a resident's perspective. Other comments included that a clear difference needs to be made between affordable housing for buying and affordable housing for renting, or that self-build or mid-market rent should not be included within a definition of affordable housing, as this leads to unnecessary confusion and debate. The need to clarify how and when the affordable housing policy is applied to specialist housing was also highlighted (and is discussed further under the *Housing – specialist* theme).

Barriers and solutions

Some respondents identified reasons or factors which they considered to be limiting the number of new affordable homes Scotland can provide. These included:

- The development of new build housing has been monopolised by volume builders who build to minimum space and environmental standards and perpetuate the spirally cost of housing.
- In the past some LDPs have minimised identified housing requirement by separating out 'affordable' and 'private' housing requirements, then using lack of funding for affordable housing to justify not allocating sufficient housing land to meet the total requirement.
- Ambitious targets for affordable housing cannot be met without the delivery of private housing and the associated infrastructure it delivers. Fundamental to this is meeting people's aspirations for home ownership and supporting the delivery of private housing, which in turn will improve affordability.

The importance of considering the latest available evidence on need and demand for housing to ensure that the development plan includes an ambitious but deliverable housing target was highlighted. It was suggested that planning policy should support new housing developments where it can be clearly demonstrated that they fulfil the purpose of meeting the demand for affordable and social housing. However, one local authority highlighted the potential scale of the challenge and commitment, reporting that their regional housing programme is taking a place-based approach across infrastructure, land, finance, innovation and skills. It seeks to accelerate the delivery of affordable housing, seven regional strategic sites and incorporate innovation in construction. They went on to suggest that NPF4 should support this scale of development as a significant contributor to national housing supply.

Another local authority noted that the overall cost of land, infrastructure and development are the largest barriers to housing delivery, and argued that the planning system working across Scottish and UK Governments should do it all it can to minimise the cost burden on providers of affordable housing. They suggested that NPF4 must embrace opportunities to take cost out of the system and compel building on vacant land. They also suggested that these opportunities should include land assembly powers and land value uplift, concluding that land assembly at the right cost has the potential to transform not only affordable housing provision but the development of places that people want to live and work in.

Other respondents identified a range of changes or new measures which they thought would assist with maintaining or boosting the number of new affordable homes that can be developed. These included:

- Supporting affordable housing requirements for market development which are evidenced by both need and viability assessments, unless other funding and delivery mechanisms to provide full affordable need can be identified.
- Making affordable housing a different use class, and making it easier to prevent sites specifically allocated for affordable housing being lost to market housing.
- Requiring a certain percentage of any new houses built to be affordable ones - for example if five luxury houses are the last ones built, no more are allowed until five smaller more affordable ones have been built.

- Releasing land for community-led housing, cohousing, and mutual homeownership cooperatives.
- Promoting self-build opportunities within rural settlements that have facilities and services, with guidance to assist with how this can be achieved.
- Providing opportunities for smaller developers.
- Including exception sites for affordable housing, including in green belts, so long as evidence is submitted to support local need.
- Creating opportunities for innovation and new forms of housing which build the community cohesion and mutual support vital in the post COVID-19 future.

It was noted that much of the funding available for affordable housing is reliant upon the Strategic Housing Investment Plan so the continuation of this is essential to help realise affordable housing targets.

It was suggested that policies to deliver real tenure integration and improve everyone's life chances should be set out in NPF4 and that affordable housing provision should be planned and not able to trump all other policies and the strategy of the LDP.

Affordable housing contributions

The more detailed comments made generally related to affordable housing focused developer contributions and the percentage contribution to the number of homes in particular.

One perspective was that the current reference to *no more than 25% of the total number of houses* (SPP paragraph 129) being affordable has been unhelpful and has led to the development industry challenging the need to provide the maximum standard 25% of affordable housing. Going forward, there was a concern that with NPF4 becoming part of the development plan, any continuation of wording that is open to interpretation will lead to increased debate and challenge at planning application stage. It was also suggested that the 25% cap stops identified need being met unless the local authority owns available land in the right places to plug the gap.

An alternative perspective was that the current SPP policy is correctly framed but that, in practice, local authorities are increasingly seeking higher contributions. It was suggested that NPF4 should seek to manage these variations by requiring any higher requirements to be justified, based on evidence of need and viability, to ensure that any increased level would not impact the delivery of plan policies and the viable delivery of housing sites and associated infrastructure.

Suggested changes to policy going forward included that a benchmark for affordable housing at 25% should be set and it should be stated explicitly that LDPs can adjust this depending on local circumstances, supported by evidence that is appropriate and proportionate.

Other comments included that if the contribution is to be set at a national level there should be a local exemption to allow a specific affordable housing percentage to be

achieved, taking into account pressured/highly pressured areas within the LDP area.

The third position was that it is not clear that it is appropriate for national policy to set a cap on affordable housing provision when evidence may indicate that the local requirement is greater. It was suggested that an evidence-led approach would also set the context for continued support of rural exception policies (discussed further below).

Another suggestion was that, since affordable housing contributes to infrastructure pressure, national policy could address whether or not it should pay developer contributions or benefit from an exemption. Differences in approach across Scotland were reported and it was noted that if affordable housing providers do not make a contribution, the local authority will have to take on that additional burden. It was also reported that, for housing authorities who may be paying market value for internal land transfers, this can be an additional burden which limits the scale of housing delivery.

It was suggested that the 25% provision may be having the unintended consequence of encouraging developers to build fewer and more expensive houses than they might otherwise do. This is because the cost to the developer of providing one affordable house does not vary whether their development is of large, high value, low density houses or whether it is of modestly priced and sized starter homes. It was suggested that this could be alleviated by imposing an 'affordable housing levy' on new house selling prices with the rate of levy being low on starter homes and rising sharply on 'luxury' developments. This would replace the current system and give planning authorities greater influence over where affordable housing units were placed.

Finally, there was a query as to whether the cap should not relate to the proportion of affordable houses in an area rather than focusing only on new homes. It was suggested that this would allow the housing need in the area and the total number and mix of existing housing – both in terms of type and affordability – to be taken into account.

The rural and island dimension

As with responses to the Housing Technical Statement Paper, a number of respondents commented on the particular challenges associated with delivering affordable housing in rural, remote and/or island communities.

In terms of the impact of a lack of appropriately located, fit-for-purpose housing, the challenges faced by island communities, including in relation to population decline and the sustainability of local services, were highlighted.

The need for flexible responses that recognise the local context was highlighted. For example, it was reported that within the Outer Hebrides LDP all the housing allocations are for affordable housing, as private houses are built on windfall sites. This means that it has been difficult to predict the requirement for non-affordable housing. Other distinctive features which respondents highlighted included that:

- The scale of development of affordable housing sites in the rural parts of the islands is significantly smaller than urban areas and can vary in size from one to ten houses.
- Construction on the islands can be more difficult due to higher transportation costs.
- Affordable housing needs to be of high-quality design and located in the right place to encourage retention/ repopulation of the islands.

It was suggested that NPF4 needs to enable distinct and responsive approaches to affordable housing delivery for rural and islands areas. Specific suggestions included that:

- Planning authorities with rural areas should be required to develop specific rural development and rural planning policies that take account of the needs and nature of rural areas.
- There should be capacity to diverge from the 25% affordable housing figure, including for the percentage to be higher. One local authority respondent explained that their present approach asks for housing proposals within settlements to demonstrate how they have considered and incorporated housing types and tenures which meet local housing requirements. They have found this approach to be flexible and responsive to changing requirements and suggested a similar approach be taken in NPF4.
- SPP needs to reflect different local circumstances with regard to what is considered affordable housing and the provision available for that. For example, crofter housing was historically recognised as affordable housing. Consideration should be given to how rural communities can be supported, and how croft land – which is a finite resource – can be managed and planned for.

Housing - General

Proposed key objective of NPF4: To ensure that development plans allocate the right land in the right place at the right time and to facilitate and monitor the delivery of this land

Some of the issues raised in relation to enabling the delivery of new homes were similar to those made about the Housing Technical Discussion Paper (see the relevant section of this report).

Overall aims and objectives of housing policy

There was a call for homes for all to be a central objective for NPF4, and the importance of those homes being affordable was also highlighted. In terms of the focus of policy going forward, suggestions included that it should take account of:

- Quality and design.
- The importance of placemaking, and of creating high quality and well-functioning places and mixed communities, and how new housing can accommodate the range of needs as part of better integrated communities.
- The relationship between housing and economic development, including around enhancing economic performance and place competitiveness. It was suggested that the Scottish Government's housing growth plans present an opportunity to improve the use of housing as an enabler of economic growth.
- Environmental sustainability, including that the number of new homes that can be delivered should not be to the detriment of or prioritised over principles of sustainability.
- Gender and other forms of equality. It was suggested that current services and discussions about planning for housing to 2040 do not take account of women's experiences and needs.

It was also suggested that NPF4 presents an opportunity to assist in shaping an evolving housing system in line with the ambitious vision and principles of 'Housing to 2040', that LPPs, LDPs and RSSs should all have a role to play, and that NPF4 should allow scope for regional and local priorities to be considered.

Targets

Please note that it was not always clear whether comments on targets were referring to housing land supply targets or targets for the number of new homes.

In terms of whether there should continue to be a focus on delivering homes and the quantum of land available, some respondents considered that the Scottish Government should (continue to) set housing targets. There were some references to the national targets for affordable new homes, including how local or regional plans are seeking to support the Scottish Government in meeting those targets. More generally, there was a suggestion that new homes should be classified as essential infrastructure and that there should be a pan-Scotland, all-tenure housing delivery target of 25,000+ homes a year, with minimum delivery targets for each

LDP to support the pan-Scotland target. It was also suggested that the 25,000+ new homes target should become a National Development. A number of the other National Development proposals submitted as part of the Call for Ideas also focused on the provision of new homes, including as part of the development of new towns or villages or through mixed use development of brownfield or former industrial sites.

In terms of delivering new homes more generally, it was reported that affordable housing and build-to-rent can generally be delivered more consistently and faster than the parts of the housing market dependent on the mortgage market. However, one local authority respondent reported that if either market or affordable housing targets were to be set at higher levels than existing 2027 targets, they would not be able to deliver unless policy on housing land supply is changed and clarified.

Others considered that current housing policy is too target driven. There was an associated concern that, since the 2019 Act introduces a requirement for the NPF to include housing land supply targets, there is a danger that nationally set targets and efforts to deliver them will not lead to the development of housing on the right land in the right places unless the way in which places work is fully considered in the process of setting targets. Other concerns raised about a target-driven approach included that targets are somewhat meaningless given that the delivery of housing is largely under private sector control and dependent on market conditions.

It was also suggested that nationally determined housing targets (and the 5-year effective housing supply discussed further below) do not work for some areas. For example, it was reported that the approach is not suited to the Outer Hebrides for a number of reasons including; the distinct land ownership/crofting tenure set up; limited volume house building; significant single and self-build on windfall sites; a single main RSL; two dysfunctional HMAs which do not operate like conventional HMAs; and hidden and very localised housing demand. It was suggested that these factors, along with significant build costs, all advocate for a discretionary policy and grant funding/fiscal approach for housing delivery in some areas.

Others considered that, whilst housing numbers and targets are important, or may be unavoidable, it is also important to recognise the barriers to delivery of the required number of homes and also to take account of:

- Regional and local demands and trends.
- Infrastructure issues and requirements.
- The management of greenbelts and the relationship with brownfield land regeneration, including cross-boundary efforts.
- Other policy approaches, such as repopulation.

In terms of housing supply targets to be set out in NPF4, clarity and guidance was sought in relation to:

- Any requirements regarding the composition of these targets (i.e. market, affordable, special needs sectors etc.).
- What rights or opportunities there will be for local authorities to challenge the targets and the weight given to prevailing local circumstances.

- The period of target to be used and whether this is annualised or the complete period.
- The purpose of the housing land requirement and its relevance to the preparation of LDPs.
- The approach to taking into account (or not) housing completions and demolitions.

In terms of when targets are set, and given the time taken to produce HNDAs, there was a call for NPF4 to make clear the relationship of the national targets to the continuing role of HNDAs and LHSs.

Evidence and HNDAs

The importance of taking an evidence-based approach was also highlighted, with some respondents noting the importance of ensuring the needs and aspirations of people and their communities inform that evidence base. In terms of establishing the needs and priorities of the population, there was a call for comprehensive engagement and it was suggested that if the NPF4 Call for Ideas does not garner views from all elements of the population, further targeted work will need to be undertaken to ensure views about housing needs and aspirations are properly reflected. There was also a call for co-production with stakeholders.

In terms of other evidence sources, it was suggested that housing requirements need to be derived from population and economic forecasts at national, regional and local levels. Suggestions as to additional evidence that is required included having a clear understanding of the preferences and requirements of private sector buyers.

With reference to HNDAs as a key evidence source to inform housing targets, a number of comments addressed the applicability of the approach to rural, remote and island communities, including suggesting that the calculations completed through the HNDAs are more suited to urban locations within the central belt rather than rural and remote locations. It was reported that research has found conventional HNDAs do not provide the granular detail required for smaller communities. The reference in the Planning Bill Island Communities Impact Assessment to local authority HNDAs not always picking up on specific local issues was highlighted, as was the recommendation that some areas, such as islands, should set targets locally based on their distinct development context and demand profile.

A local authority respondent reported that they would prefer to use an approach that focuses on sustainability and placemaking and which considers the local housing market and the future aspirations of all housing sectors in their area. This approach would be based on robust evidence with a focus on identifying the most appropriate land in the right locations, as well as reflecting local traditions, such as for self-building.

Other suggestions included that local surveys should be used more widely and could inform an LPP type of approach to ensure that planned development meets a community's need while also building support for development and placemaking.

Plan-led approaches and the planning system

It was suggested that the further division of the layers of the planning system (national, regional, local authority, local) will mean that the issue of housing targets and provision of land for housing will require to be transparent and easily understood for all involved.

A concern was raised that rather than being plan-led, in reality we have a development-led system. It was suggested that this is inscribed in everything from the 'call for sites' that are viable and deliverable to the fact that the system relies on developers to bring proposals forward whether or not they have been identified in the development plan.

Others raised concerns that in recent years, it has been hard to see how a masterplan has been guiding the design and development of towns in particular. There was an associated concern that *ad-hoc* housing has often been built through 'planning by appeal' and that this development sometimes looks suspiciously like part of an unannounced longer-term phased development. There was a suggestion that LPPs might be a good way to develop community empowerment and create better environments.

It was recommended that Scotland implement a real plan-led system where plans designate the most suitable sites for development and there is a presumption against development that departs from the plan. However, it was also suggested that being plan-led does not necessarily mean plan-led at a national level and that many issues are more appropriately left to local authorities through their LDP.

Other suggestions included that:

- An organisation for Scotland similar in structure to the Homes and Communities Agency would have greater potential for achieving more efficiency and financial impact for the delivery of varying housing needs. This would allow planning authorities to work together to reflect functional HMAs that cross local authority boundaries.
- Given their enhanced role, it must be made clear that forthcoming LDPs must, as they are required to do currently in their relationship to Strategic Development Plans, be consistent with NPF4 and its successors.

Housing Land Supply and effective land

A wider concern raised was that the current housing land supply approach does not work as it undermines the LDP and the alignment of growth with planned infrastructure, and removes confidence from politicians and communities that what they are engaging with through the LDP process is what will be delivered.

There was reference to the report of the Independent Review of the Planning System in 2016, which highlighted the impact of the confusion around measurement and definition of 'effective' housing land and recommended that a clearer definition be established. It was suggested that this issue remains a key piece of unfinished business from the independent review and NPF4 is an opportunity to set out a clearer policy context for how housing land and housing delivery are measured and dealt with.

Other comments on effective land supply often reflected those raised in relation to the Housing Technical Discussion Paper. They included that the effectiveness of sites is not the best way to measure the land supply available, with reasons given including that:

- Sites should all be effective and if there is clear evidence that a site physically cannot come forward ever it should be removed from the relevant plan.
- Effective/constrained status can be easily manipulated to push further housing land to be allocated unnecessarily, furthering the issue of land banking.
- Long-term strategic sites can be slower to deliver and this is often used as a reason for the release of additional smaller sites to make up for the 'shortfall' in delivery. However, this can lead to further slowing of progress on large scale sites.

In terms of the role of HLAs, variations included that they should be seen as a corporate tool to direct investment in infrastructure and help budget planning.

In relation to both carrying out and the ongoing monitoring of HLAs, comments included that:

- An approach based around land value sharing (rather than land value capture) might be a good way forward and is more likely to stimulate positive co-operation from landowners and others.
- It should be made clear to the development industry that timescales and build rates supplied to inform the HLA need to be realistic, achievable, and should not be artificially inflated/suppressed.
- More rigorous site assessment processes are required to ensure that all sites included in an LDP are achievable.
- Changes to densities/designs that have previously been desired by house builders may be required. LPAs currently have little evidence on housing preferences in terms of design/layout etc. and are frequently told by developers that their house styles reflect the market demand. The Scottish Government or LPAs may wish to carry out their own research to verify this and spark a discussion with developers as to the design and layout of sites.

Some of the challenges identified in relation to ensuring that the right land is allocated and then developed included that there needs to be clarity around:

- What, if anything, will be a trigger in terms of identifying if housing land policies in the plan are to be considered out of date.
- Why the current 5-year land supply period has been chosen.
- What planning authorities should do in the event that the land supply is considered to be inadequate/out of date.

Challenges or issues which respondents identified as needing to be considered going forward included that:

- One of the principal policies of SPP within paragraph 28 is the presumption in favour of development which contributes towards sustainable development.

However, the policy has made no notable difference to how housing applications are considered. There should be an updated presumption policy that is less reliant on debatable concepts such as effective housing land shortfall and which, instead, presumes in favour of any development which will contribute to the delivery of homes, which will not cause adverse impacts.

- Shortfalls in the land supply should not have to be remedied through the planning appeal system. Any planning authority that is unsuccessful in delivering the quantum of new homes apportioned in NPF4 targets through its LDP, should be required to move quickly to make additional land available, both through the granting of planning permission and the new statutory procedures for plan review.
- Lack of effective land supply for housing is maintaining the high value of sites, and the overall high cost of creating housing. While allocation of sites within LDPs is not always an issue, there are also challenges with the profitability of site development. This is determined by several factors, including landowner aspiration of value as well as significant land preparation and servicing costs.
- While planning has an important role there are frequently factors outside the role of planning which limit development of housing. For example, a slow rate of sales due to a 'flat' market can mean that it is not possible for a developer to secure funding to cover the costs of getting development underway.
- It should not be a given that a shortage in the build programme necessitates the release of land. It should also be made clear whether LDPs will have the opportunity to include a local policy on further land release criteria in the event that such a shortfall does require such a release.
- The presumption in favour of sustainable development when a local authority is judged not to be maintaining a 5 year effective housing land supply does not seem in keeping with the proposed NPF4 objective that development plans should allocate the 'right land in the right place at the right time'. This can only be achieved through a co-ordinated process where the main issues relating to housing need, sustainable locations for development and impacts upon infrastructure and existing communities are assessed together in a strategic manner.

It was also suggested that completion rates should not drive the release of additional land. With specific reference to the impact of COVID-19, it was seen as important that NPF4 and Homes for Scotland recognise that the non-delivery of housing land that has been identified within LDPs will not always mean that there is a shortfall in the land supply.

The need for NPF to have a trigger for the further release of land where sufficient land supply is not being maintained was accepted by some respondents, although it was suggested that the current 5 year trigger in SPP is problematic and the opportunity should be taken to review this in NPF4. A range of associated challenges were highlighted including that:

- The current trigger appears arbitrary and, in effect, gives developers the opportunity to downplay their build rate and local authorities a reason to inflate it, neither of which is helpful or achieves the goal of delivering the right

development in the right place and providing homes where and when they are needed.

- Local authorities and communities are effectively penalised for failure to meet housing targets due to the market moving at different rates.

One suggestion was the definition of effectiveness needs to be reviewed in relation to the marketability criteria and that the effectiveness of the housing supply delivered in meeting the housing needs of the area should be the ultimate test of effectiveness of the housing land supply part of the LDP. A local authority respondent reported that they have been working with Homes for Scotland and Heads of Planning Scotland to develop a new, clearer approach which addresses most of the problems and impacts identified by the Independent Review by the simple step of measuring the supply of effective housing land and the rate of housing delivery as separate things. They went on to report that Heads of Planning Scotland members have drafted a paper setting out proposals for a new, common approach using the principles of separate measurement. The associated recommendations were that NPF4 should:

- State that the supply and availability of housing land (established and effective) should be measured separately from housing delivery/completion rates.
- State what should happen in situations where the supply of effective housing land will be used up before a specified number of years (e.g. 5 or 10).
- State what should happen in situations where the programme of housing completions over the forthcoming period is insufficient to meet the relevant targets.

Other suggestions regarding how any future approach could be structured included that:

- The trigger should move away from the automatic assumption that more housing land needs to be allocated, and instead there should be more emphasis placed upon developers developing their sites and what is reasonably required from LPAs to enable this.
- The gatecheck process for LDPs should set out what the HNDA says is the need and demand, but then provide evidence for a policy view on the number of new homes the planning authority realistically thinks it can achieve over the LDP period.
- There should be no continuation of unbuilt planning applications, or there should be a presumption against the renewal of planning permissions for housing developments or, in the case of larger sites, a requirement for a phasing agreement whereby planning permission would be revoked if the permitted housing is not delivered. Alternatively, a mechanism could be introduced whereby a developer or landowner would face a financial penalty in cases of non- or under-delivery unless there are proven economic or technical reasons why development has not gone ahead.

- NPF should have provision for local authorities to declare that areas have no capacity to release land or improve infrastructure - there are places that are full.

Other comments addressed land value and included that:

- The uplift in land values accruing from the grant of planning permission (or betterment) should be captured for the public good. It was suggested that by removing the potential for speculative profit and loss on land, the planning system could effectively de-risk development whilst leaving developers free to compete based on the quality of what they build, rather than underlying (and unproductive) land values.
- There should be continued support for policies and research on land value capture to help deliver well-planned sustainable communities in places people want to live and at prices they can afford to pay.

Monitoring of homes delivered or land availability

One perspective was that planning authorities cannot or should not monitor the number of homes delivered, as authorities do not control delivery on the majority of sites.

An alternative view was that, while current measures of housing completions appear to be unreliable and are insufficiently detailed to allow progress to be monitored with any degree of certainty, reliable statistics on housing starts and completions need to be collected. These should be by type, tenure and split by functional housing market (if adopted) as well as by authority. It was reported that this type of information is probably best generated from HLAs but must be reconciled to the issue of completion certificates to allow greater confidence to be placed on quarterly official figures.

It was also suggested that mapped and audit information could be used to secure a stronger emphasis on monitoring and that this could be done by standardising HLA data and methodology using a distributed database system using geolocation techniques.

Other suggestions included that LDPs should include a policy setting out the action which will be taken if availability falls short of stated targets and that it would be useful to have this general policy response set out in NPF with scope for planning authorities to vary this if necessary, to reflect any particular local circumstances.

Size of homes and density

A number of respondents commented on the number and size profile of new homes being constructed. It was reported that, although LDPs have given indicative capacities for housing sites, based on the characteristics of the site and the surrounding area, it has generally been left to the developer of the site to identify the exact number of houses proposed and also the size of those houses.

With regard to density, it was suggested that private sector housing generally delivers large 'executive' homes at lower densities during a buoyant market, not

providing the mix that is necessary for quality, long-term sustainable communities, and increases pressure on issues such as affordability.

It was reported that the opposite market conditions increase site densities where issues such as reduced floorspaces of homes create lesser-quality home environments and reduce adaptability to changing needs.

A local authority respondent reported that their area has tended to see the development of 3 or 4 bedroom houses, while evidence from their HNDA and discussions within communities has indicated that a far broader range of housing is required, including smaller housing and flatted developments.

Challenges identified included that:

- The type of houses delivered by housing providers will also become more important as demographic changes continue.
- There are not the resources, mechanisms and data monitoring in place for planning authorities to set out the needs of specific mixes of homes (e.g. bedroom numbers, house types).

Suggestions relating to density and size or type mix included that:

- NPF4 should reflect the importance of land by applying a minimum density requirement.
- Applying standard densities based on the location of the settlement (semi-rural, rural, urban) may encourage more effective use of land, without leading to over- or under-development in some areas.
- The NPF should encourage higher density housing and a full range and mix of different house types, on larger sites too, in the interests of good place making for the longer term.
- NPF4 could encourage and support the identification of ratios or percentages of different types and sizes of housing to be identified on each site through development plans. This could be in the form of a percentage, with some flexibility (+/- x%) to allow for suitable layout and design solutions. It was suggested that such an approach could support a move to more mixed, more inter-generational developments.

It was also suggested that local authorities, through consultation with local people, should be able to stipulate to developers what type of housing is required - for example, stating that a portion of any proposed development should include terraced, semi-detached or housing for older people. Specifically, it was suggested that the HNDA output should be made more granular by indicating the quantum of need for student accommodation, starter homes, homes adapted for disabled occupants, homes suitable for elderly occupants and other categories identified as being required.

It was also suggested that changes in demography, land availability and socio-cultural trends have increased demands for more varied siting and adaptive design. Examples of the types of properties required included:

- For single person occupancy.
- For small home living.
- With onsite annexes for dependants/boomerang children.
- Of zero carbon design.
- Recreational huts or alternative tourism accommodation.
- For seasonal workers.

It was seen as important to ensure there is clear policy direction and a responsive policy framework in place to assess applications for properties such as those listed above while maintaining standards to ensure they are well designed, safe and energy efficient.

Issues around affordable homes and tenure mix are considered in greater detail at the *Housing - affordable* theme.

Placemaking and sustainability

While sometimes noting support for the proposed key objective of ensuring that development plans allocate the right land in the right place at the right time, the importance of housing development to placemaking and the health and wellbeing of communities was also highlighted.

It was suggested that the focus needs to be on the creation of high-quality places to benefit local communities whilst recognising the need to support the economy and the housebuilding industry. It was suggested that mixed residential development which supports a broad demographic is required, which in turn promotes inclusivity and diverse types of housing.

Other factors identified as needing to be considered included:

- Landscape and infrastructure capacity.
- Environmental considerations.
- Cultural heritage and archaeological designations.
- The relationship between housing and health, with a suggestion that access to housing that is affordable and health promoting should be specifically recognised as a key feature of any place.

It was suggested that whether it be social or private, new housing should be built in places where communities can thrive and where residents have access to services and are well connected, with a view to creating healthy sustainable lifetime communities. Other comments included any new housing should be positioned with a view to:

- Placing sustainable travel – including walking, cycling and public transport – at its heart. This was seen as vital to delivering on the environmental, social and economic targets of Scottish Government. As a minimum NPF4 should, for example, set a benchmark that new housing development should not be supported if it is not accessible or cannot be made accessible by regular public transport services or is easily accessible by active travel modes

- Preventing and protecting from consequences of environmental changes, such as flooding.
- Being smarter, in order to release areas of the housing stock, including by facilitating downsizing. It was suggested that well planned housing for downsizers has a lesser footprint and is more sustainable than building on greenbelt and farmland around commuter belt towns.

In terms of building or sustaining communities, including in relation to the local and wider economy, comments included that:

- Zoning needs to be more keenly related to the proposed uses, especially in relation to location of housing, to better align where people live to their type of work, and in relation to the regional placement of centres of industry and productive work. In making such decisions we should leave a positive legacy for future generations.
- NPF should encourage all developers to demonstrate how their investment will contribute positively to economic development and regeneration objectives, and social, environmental, ecological and climatic effects.
- Paragraph 29 of SPP refers to principles including net economic benefit, yet there is limited evidence of consistent efforts being made in planning decisions to consider the net economic benefit of residential development such as job creation and the easing of pressures on affordability. These factors need to be considered alongside wider planning considerations.
- There needs to be a much more flexible approach that takes account of pending/future economic opportunities and the needs of employers.
- The allocation of land to smaller towns and villages, where appropriate, could provide housing choice for local communities, and help sustain local services.
- In high demand areas, public sector funding may be brought forward to take advantage of lower land values, and to encourage an improved and expanded private rented sector to support labour market mobility, which will be key in a recession. In weaker housing markets, investment should be focused on upgrading existing stock and quality of place improvements, over new supply.

Finally, it was suggested that there is more scope for small-scale housing development including clusters and groups near settlements, replacement housing, and plots on which to build individually designed houses in rural Scotland. It was recommended that this be included in development plans, either as part of a general settlement policy or as a separate sub-set on rural housing policy.

Infrastructure and developer contributions

Some respondents commented on the importance of taking existing infrastructure or new infrastructure requirements into account when planning for new homes. It was noted that people want to live where facilities are available and that, in the case of any new settlement type development, it will succeed where infrastructure of all types is concentrated.

However, challenges were also noted, including the suggestion that, while local authorities start off by trying to plan growth alongside infrastructure development,

all too often landowners obtain planning approval but the upfront infrastructure costs can lead to approved development not happening and to a shortage of new build numbers.

The importance of taking a strategic approach was highlighted, and there was an associated suggestion that Scotland could benefit from funding of a similar scale to that provided by the UK Government Housing Infrastructure Fund.

Other infrastructure-related comments focused on developer contributions and included that:

- Developer contributions have continued to increase over the past decade, and it must be acknowledged that developers are not able to fund all infrastructure requirements. Levels of contributions have risen to over £20k per plot and such levels will make schemes unviable, particularly in periods of recession. Central funding for key infrastructure should be addressed with contributions for site-specific matters being provided.
- NPF4 could greatly assist by setting out typical infrastructure costs or section 75 contributions required from development. It was suggested that the reduction in section 75 contributions per property over the past 10 years is leaving far too many new housing estates without the required infrastructure.
- Providing greater clarity and certainty on the level and timing of developer contributions would result in land changing hands for lower prices and leave more surplus available to help pay for infrastructure. Improving guidance on developer contributions to improve clarity and consistency of application across the country could help to address this.
- The Developer Obligations System should be less restrictive and more flexible.

Finally, it was suggested that NPF4 could help overcome some utilities servicing constraints in remote and rural areas by using appropriately designed off-grid housing as a credible option, with appropriate support to upskill and promote broader understanding and adoption of off-grid methodologies.

Quality of design and build

It was seen as important not to focus simply on numbers but also on the quality and design of new homes being built, that they are accessible and are built to lifetime homes standards. Concerns were raised that most new housing in Scotland is poorly designed, lacks character, and is too small and that housing design often adopts an approach that favours a particular style rather than requiring sensitive and harmonious design. Increasingly limited outdoor space was also highlighted.

It was suggested that, while all LDPs currently have policies on design, without a stronger statement through national policy some developers may seek to deliver poor quality layout and design. One suggestion was that a key focus for NPF4 should be to promote a Scottish Housing Standard, which would, for example, set standards relating to low energy requirements, lower waste objectives, and ensure all new houses are accessible.

In terms of how the quality and design agenda can be taken forward, comments or suggestions included that:

- Any policy interventions in NPF4 seeking improved technical standards would be best achieved through the Building Standards process.
- While a change to the housing delivery calculation will help ensure better balance on decision-making, this must be supported by strong appeal decisions which see poor design, even in mainstream areas not affected by conservation area designations, as unacceptable.

Brown and greenfield/greenbelt

The connection was sometimes made between the efficient use of vacant or derelict sites and/or with avoiding the use of greenfield or greenbelt sites (both issues covered in greater depth at the relevant themes) and with the wider sustainability agenda.

For example, it was suggested that prioritising sustainable locations will mean prioritising brownfield sites over greenfield, edge of settlement sites. The benefits identified included protecting prime agricultural land and greenspace, not over-stretching infrastructure and services, and not creating car-dependent communities that add to carbon emissions while depopulating more sustainable town centres. It was reported that many LDPs already aim to guide development in this way and there was a call for the principle needs to be reinforced through NPF. One suggestion was that we should build more compactly within the existing footprint of our towns and to higher densities in their centres.

Comments relating to the development or redevelopment of vacant or derelict land, or disincentivising development in greenfield areas, included:

- While the re-use of urban brownfield locations is to be encouraged, not all brownfield locations are suitable for development for sustainability reasons – for example those situated within isolated countryside locations with no services.
- Zero VAT could apply to LDP allocated or brownfield sites, with full VAT payable on greenfield or greenbelt sites.

Existing housing stock

In addition to comments relating to new supply, some respondents addressed issues associated with the existing housing stock. These included that refurbishment, adaptation and improvement of existing stock and associated community regeneration have a role to play in a refocusing on quality of housing. The importance of continuing to tackle empty homes was also highlighted, with one local authority respondent reporting that long-term empty properties in private ownership equate to 3.5% of local housing stock.

Suggestions for taking the approach to existing stock forward included:

- Considerations should be given to additional mechanisms, including planning regulation and taxation, to address the issues of empty and second homes.

- Financial and practical support should be offered to restoring developers. The public sector should be enabled to take a lead in the re-use of historic buildings for housing where this is appropriate. There are models of public interest-led development where the financial risks of restoring historic buildings and places for housing delivery are shared, and these should be explored.
- Enabling the re-use and refurbishment of existing buildings for housing might require greater public sector intervention. For example, Historic Environment Scotland currently offer a Historic Environment Repair Grant and the Conservation Area Regeneration Scheme for the maintenance and re-use of existing buildings.
- Local authorities need the tools and resources to repair and bring empty buildings into use for housing where appropriate. This could include more scope to use Compulsory Purchase Order or Compulsory Lease powers where property is at risk.
- In the case of repairs to neglected tenement housing, there should be consideration of how this is to be enabled, alongside any planning provisions.
- Housing audits should consider means of paying for repairs to existing housing where the owners cannot do so.
- VAT should not be payable on repairs.

Other comments addressed particular types of existing stock and included that tenements are a valuable form of Scottish housing which should be preserved. To be effective, a review of the planning process should take into account the possible effects on neighbours' quality of life as well as the structure itself when considering planning applications for internal alterations whether the building is listed or not.

Issues associated with the energy efficiency of buildings or the use of sustainable building materials are covered under the *Climate change* and *Sustainability* themes respectively.

Other issues

Among a range of other issues raised were a number which had a rural dimension. These included that:

- Any application from an intended owner occupier/self-builder for a single house on a single plot of ground should be exempt from requiring planning permission.
- The issue of succession housing for rural businesses needs to be considered. It was suggested that planning policy should explicitly recognise that building a new home in the countryside is justified when it will enable a farmer to retire and transfer a farm to the next generation.
- There is an opportunity for the Crofting Commission to be empowered to support applications from development partnerships to take land out of crofting tenure for appropriate home builds which satisfy broader community housing needs.

Further points raised included that:

- Proposals for new housing near to airports should take full account of existing airport infrastructure and potential noise and should include noise mitigation features within their developments. Housing built in existing noise contour areas should meet higher standards of noise insulation.
- NPF4 needs to address the problem of shared equity housing becoming open market housing at the second sale, which results in continuing, unsustainable demand for new shared equity housing to be built.
- National legislation on the definition of a caravan needs review as an increasing number of alternative developments are being inappropriately assessed under this.

Housing - Specialist

Key objective of NPF4: To improve the policy so that the housing needs of older and disabled people are better accounted for in the planning system.

Many of the comments at this theme were relatively brief and focused on agreeing that NPF4 and SPP considers the needs and aspirations of an older population and disabled people.

Further comments included that existing policy is fit for purpose in that it meets legislative requirements in committing to meeting the housing needs of older people and disabled people and the inclusion of these in LDPs. However, it was suggested current planning policy on accessible and adapted housing, wheelchair housing and supported accommodation is not proportionate to the likely future scale of the requirement.

Some respondents commented on the types of homes and/or facilities that are likely to be required including:

- Bespoke housing, such as bungalows.
- Contemporary single storey solutions and small gardens for the increasing numbers of wheelchair users and their families who are not ready to live in flatted development.

It was reported that an accessible and inclusive environment is likely to sustain health, prevent isolation and promote participation and that there is an opportunity for planning to promote building design standards and environmental design standards such as street design which prioritise accessibility, inclusion and integration for all residents. It was also suggested that many of the issues identified in ancillary strategies such as housing for older people, and tackling loneliness and social isolation, will be addressed through application of the place-making approach.

In terms of aspects of the local environment that can be important, suggestions included:

- Avoiding shared spaces.
- Making the community dementia friendly.
- Providing pavements with dropped kerbs at crossing points and controlled pedestrian crossings where appropriate.

Role of planning policy in meeting need

It was suggested that, given the new legislative requirements, existing policies would not provide sufficient guidance on how to address more specific targeted needs. It was suggested, for example, that it is unclear whether the expectation is that the general housing land supply would be the main area for delivery of particular needs and whether, if this is the case, it is the expectation that the desired outcomes would be achieved through design standards and on a particular scale.

It was noted that the current approach has been to not intervene in house types provided by builders for the private market. However, it was also suggested that some local approaches are emerging which are difficult to satisfy on a typical new build development, and that home builders already play a significant role in the provision of highly accessible homes for a wide range of users.

One perspective was that new planning policy should not be prescriptive in relation to specialist housing provision but should recognise that the latter stages of the HNDA and the LHS process will draw out local needs. It was also noted that Building Standards already require houses to be built to be adaptable and it was argued that NPF4 should not replicate provisions made through other legislation. Rather, it was suggested that as a minimum it should reinforce the need to comply with the 'basic' requirement for wheelchair users, as outlined in Housing for Varying Needs, and Lifetime Homes Standards.

With specific reference to wheelchair housing, it was suggested that the planning system may not be the best mechanism to address the requirement for wheelchair accessible housing across all tenures. Further, without buy in from the private sector an annual all tenure target will not lead to a change in all tenure supply of such housing types and could put additional pressure on the affordable housing sector to deliver wheelchair accessible housing. It was also reported that requirements for more single storey homes to meet wheelchair targets have the potential to impact on the viability of sites and to squeeze the land area available for affordable housing.

An alternative view was that NPF4 must require all new houses to be suitable for occupation by anyone who is mobility-impaired or who needs a hospital-style bed with a hoist to assist getting in and out of bed. It was suggested that these and other relevant requirements might best be implemented through the Building Control function and could make it possible for someone who has lived in their house for many years to continue to live there if they become less mobile or less well. There was a call for NPF4 to include a commitment that Building Standards will be reviewed to ensure that all new dwellings really are suitable for life-time occupation.

However, there was also a suggestion that a policy at national level, similar to that for affordable housing, requiring a minimum percentage of the market units to be specialist housing or housing which is capable of adaption would be helpful. It was proposed that, as for affordable housing, requirements could be varied downward where appropriate. It was also proposed that there should be a requirement to supply the specialist housing provision as set out in the LHS and that this must involve powers to require private developers to build for specialist needs.

To effect real change, it was suggested that planning authorities need more certainty to give them the confidence to allocate sites specifically for specialist housing and to require construction of new accessible/adapted/wheelchair housing, particularly in new build private sector housing.

There was also a call for clarity about how and when the affordable housing policy is applied to specialist housing. The local authority respondent raising this issue

considered it will be ever more important to be able to apply affordable housing policy to specialist housing. However, they did suggest that it may not be appropriate to apply the policy to all types of specialist housing such as Care Homes.

Other ideas for tackling some of the barriers to the provision of more specialist housing included that:

- Wider/general housing policy requirements can support delivery of this policy objective by working with all relevant stakeholders including RSLs, Health and Social care colleagues and the third sector with a view to improving data on the need and demand for appropriate, accessible and adaptable housing.
- If it were to become a planning issue, NPF4 should define what is meant by accessible homes and establish a workable approach to delivering it through the planning system. If targets are set, consideration should be given to how they can be monitored and implemented given the restricted resources of local authorities.
- Allocation of specific sites might assist in suppressing the land value which can be a hindrance to development of what tends to be relatively low-density housing.
- New build housing should be required to be built to wheelchair accessible housing to varying needs standards, including the ability to adapt properties to future requirements.
- Building Standards should be aligned across tenures to minimise the difference between affordable and open market properties, for example to assist and enable the delivery of wheelchair accessible properties. It was suggested that this approach would help strengthen policy, encourage a wider range and diversity (type and size) of properties across tenures.
- The re-establishment of a national housing agency would provide greater efficiency and co-ordination, together with improved methods for assessing housing need and demand for specific forms of specialist housing.
- Gathering robust evidence in terms of private sector wheelchair housing needs.

Other suggestions relating to what planning policy, and NPF4 specifically, should do included considering ways to:

- Proactively respond to the aging population, not just focusing on people's needs now but how they plan and prepare for older age.
- Ensure flexibility and adaptability in all types of new-build housing, reflecting that many people as they get older, or as their mobility needs change, want to remain in the house they already live in, possibly by making the Housing for Varying Needs Standards mandatory.
- Investigate the role that technology can play in enabling independent living and to what extent this may or may not be relevant to planning's role in meeting housing need.

- Encourage the development of varying types of specialist housing, and smaller properties that would appeal to older people even if not marketed or restricted as such, for those older people who do wish to move home.
- Prioritise the importance of location and access to local services and avoid larger-scale older peoples housing developments designed to function as self-contained communities and/ or with poor access to public transport.
- Introduce a requirement to provide bespoke housing for the elderly (bungalows) to meet the demands of an aging population.

Finally, respondents identified other groups who may require specialist housing responses. These included:

- Children in poverty, given that a major contributing factor to poverty is cost of housing.
- Women affected by domestic abuse and requiring refuge accommodation.
- Some Black, Asian and Minority Ethnic communities who are more likely to live in overcrowded housing.
- New families to live and work in island or remote communities. In particular, it was suggested that non-linked islands face a number of housing issues including a lack of suitable and available vacant houses, no or limited tradespersons to build/adapt properties at an affordable cost, or a high proportion of vacant/ruined houses.
- Households that are in fuel poverty. It was noted that in some areas this group will include elderly people living in older houses with inefficient and costly oil-based heating systems.

Waste

Proposed key objective of NPF4: To support the management of waste in line with the waste hierarchy (waste prevention; reuse; recycling; energy recovery and waste disposal) and to guide development for new infrastructure to appropriate locations.

There was broad support for development of a circular economy and embedding of zero waste principles in NPF4 although it was also suggested that the relationship between the Zero Waste Plan, the Making Things Last Strategy and the planning system is not clear.

Conserving natural resources, reducing dependency on imported materials, reducing the need for landfill, triggering investment in design of innovative materials and creating demand for local, renewable materials were all highlighted as potential benefits of improved waste management, and it was suggested the public sector could lead by example through revising its procurement and stewardship processes.

It was noted that reducing waste will require changes to working practices for many businesses who will need support during this transition. Providing tax incentives to environmentally friendly companies promoting biodegradable and recyclable non-harming products was suggested, as was creation of a sovereign wealth fund as a rolling fund to develop a circular economy.

Construction sector

The high levels of resources used by and waste generated by the construction sector were highlighted, and it was suggested the planning process should:

- Include a presumption in favour of enhancing, re-purposing or maintaining existing infrastructure to make continued use of existing assets. Repair and re-use of existing buildings should be promoted before new development.
- Require building materials to be re-used where possible or set re-use targets at regional, local, corporate and project levels, along with a requirement for monitoring and reporting. Pre-demolition audits, materials and buildings passports and collaboration between stakeholders were all suggested. A link was also made to policy on mineral extraction.
- Include targets for waste management both on site, off site and in use as planning conditions. Require uses for surplus waste soil to be considered at the design stage.

With respect to new development it was proposed that the principles of the circular economy should be integrated into building design, creating buildings to be adaptable and long-lived, with materials that can be re-used. Assessing the carbon footprint of any new development was suggested as was encouraging use of local renewable materials.

The need to design settlements to allow easy access to local repair and refurbishment facilities, as well as widespread and comprehensive recycling opportunities was highlighted. Suggestions included:

- Providing adequate storage space within property boundaries for domestic recycling bins.
- Ensuring the layout of commercial development supports waste management to avoid commercial refuse being left in the street.
- Providing space for composting and stimulation of community composting schemes.

It was also argued that sustainable waste-water treatment should be in place before any development takes place and that maximum capacity must be considered when adding new developments onto existing infrastructure.

Waste management infrastructure

Several respondents commented on requirements for appropriate infrastructure for a circular economy and sustainable waste management.

Enhanced infrastructure for collection of high-quality recycled materials was suggested to be necessary, with more sorting, processing and manufacturing facilities required to collect such material and optimise its value. The Deposit Return Scheme was cited as an example.

While the importance of waste prevention, re-use and recycling was noted, it was also observed that waste management options towards the bottom of the waste hierarchy still have a role to play. There was a call for NPF4 to recognise the importance of Scotland's waste management infrastructure, and to ensure that planning authorities make provision for waste management capacity across all levels of the waste hierarchy. It was also suggested that a stronger link between planning and the circular economy would assist the waste management industry to invest in the infrastructure needed.

National Development proposals included for a country-wide network of planned, complementary, full spectrum material and resource management facilities to support Scotland's circular economy and net zero ambition.

A requirement to increase capacity at existing sites or to provide additional facilities to manage segregated waste streams was suggested. With respect to where such sites might be located, it was suggested their strategic importance means planning authorities should apply added weight when considering special circumstances for proposals located within the greenbelt.

It was also noted that operators may see landfill sites as locations with potential for other waste management uses, with a potential impact on planned restoration and it was suggested guidance on this would be useful.

In the longer term, it was suggested the planning system needs to be flexible enough to allow the waste and recycling industry to adapt to new business models as the circular economy evolves.

Energy from waste

It was argued that the support for EFW provided under NPF3 should continue and that the forthcoming ban on biodegradable municipal waste being sent to landfill will increase the need for EFW plants. Comments included that:

- LDPs need to be able to address requirements including the continued use of some landfill sites, an increase in EFW plants, and where they are best located.
- Traffic impacts on communities must be considered as waste from multiple authorities will need to be transported to plants to supply sufficient 'feed stock'.
- Anaerobic digestion is generally more suited to (semi) rural rather than urban environments and, as argued above, proposals for sites located within the greenbelt should be considered.
- EFW plants can contribute to local heat networks.

There were calls for a moratorium on building new incinerators, particularly in the context of the ban on biodegradable municipal waste being sent to landfill. Concerns regarding the role of incinerators in both carbon emissions and generation of toxic ash were cited and it was argued that there should be no place in Scotland for burning valuable resources. Further, it was suggested additional incineration capacity could reduce the incentive for reduction, re-use and recycling of waste materials.

The potential for conversion of sewage into energy while recovering bio-resources, and for recovering heat from sewers was also noted.

Cutting plastic pollution

Roles for NPF4 in promoting responsibility for local litter collections and in keeping rural and coastal communities free of waste, particularly plastic pollution, were suggested.

There were calls for action on the use of plastics, and of single-use plastics in particular, with specific suggestions including:

- A ban on single-use plastic in takeaways as part of licensing/change of use permission.
- A ban on new plastic production facilities.
- Integration of measures such as plastic bottle deposit schemes and no single-use plastic into a green supply chain for publicly funded buildings such as schools, libraries and council offices.

There was also a suggestion that use of biodegradable/recyclable products in manufacturing should be promoted and that more emphasis must be placed on the packaging industry.

Work

This part of the report covers Early Engagement Policies under the 'Work' heading and includes sections on:

Aquaculture

Business and employment

Energy - Electricity

Energy - Heat

Mineral extraction

Rural development

Tourism

Town centres

Aquaculture

Proposed key objective of NPF4: To support the sustainable growth of the finfish and shellfish sectors to ensure that the aquaculture industry is diverse, competitive and economically viable and that new development is guided to coastal locations that best suit industry needs with due regard to the marine environment.

An alternative wording of the key objective was proposed in order to both take account of other planning considerations and ensure support for small scale start-up businesses. It was suggested the objective should read:

‘To support the sustainable growth of the finfish and shellfish sectors to ensure that the aquaculture industry is diverse and competitive. New development is guided to appropriate locations with due regard to the marine environment, carrying capacity and novel technologies, such as closed-containment and non-chemical sea lice treatments for finfish aquaculture.’

The need for NPF4 to ensure alignment of terrestrial planning processes with the National Marine Plan and subsequent regional marine plans was also highlighted. Specifically, it was argued NPF4 should reference:

- The need for aquaculture to take full and considered account of Scotland’s network of marine protected areas including national nature conservation marine protected areas.
- The suite of proposed marine Special Protection Areas and marine Special Areas of Conservation.

Sustainable development of the aquaculture sector was suggested to require implementation of higher standards of environmental regulation to safeguard marine protected species and habitats, including priority marine features.

It was suggested that there is currently a lack of explicit guidance on aquaculture despite the size of the salmon farming industry and the controversial nature of some developments. Lack of guidance was argued to create uncertainty for both policy makers and developers. Specific suggestions included:

- Clarification of responsibility for each aspect of the aquaculture assessment process. A need for clarity on where different agencies’ responsibilities lie in relation to sea lice, fish health, disease management areas and interactions with wild fish populations was highlighted.
- Clear guidance on issues associated with a move of fish farm sites out of enclosed lochs into open coastal waters.
- Updating Circular 1/2015 to reflect changes in marine and coastal development and planning, potential changes in foreshore and seabed ownership and control and to better acknowledge the advent of marine planning.

The work of the Regulators Technical Working Group to look at providing better spatial planning advice was supported.

Creation of a National Aquaculture Technology and Innovation Hub was proposed as a National Development. It would create the UK's leading innovation community for sustainable aquatic food production and lead development of new technologies and systems required to support growth in the production of aquatic food for human consumption, while reducing the impact on natural resources.

Finfish aquaculture

It was argued that current policy that presumes 'against further marine finfish farm developments on the north and east coasts to safeguard migratory fish species' implicitly accepts that further finfish farm development is not compatible with safeguarding migratory fish. However, conservation of these species on the west coast and islands is not addressed and it was proposed that future policy must be science-led to identify areas of opportunity and constraint around the entirety of Scotland's coastline.

An enquiry into the effects of commercial fish-farming and designated places for aquaculture was also suggested.

It was argued that NPF4 should make direct reference to working with SEPA via the guidance of the Finfish Aquaculture Sector Plan and to the revised regulatory framework for this sector. It should also reference the outputs of the Rural Economy and Connectivity Committee 9th Report on Salmon Farming in Scotland, which informed the plan and regulatory framework.

Business and employment

Proposed key objective of NPF4: To promote business and industrial development that support sustainable and inclusive economic growth while safeguarding and enhancing the natural and built environments.

Please note that a number of responses set out one or more proposals for new or continuing National Developments or for other investment priorities. Many of these proposals included opportunities for business growth and were expected to generate employment opportunities. These were sometimes through the delivery of the proposed project, for example through construction jobs. Some proposals, for example those related to the development of business parks, were designed to bring in employers to an area. A number of the proposals involved the re-use of brownfield or VDL, including large sites connected with the decommissioning of power stations or the closure of large industrial facilities.

Some respondents also provided information about their own sector or their local or regional economy, including in relation to challenges or opportunities. The focus of the analysis presented below is on general and systemic issues raised by respondents.

Among general comments, there was support for the proposed key objective including because:

- Sustainable economic growth will assist in reducing poverty and inequality across Scotland.
- It is in line with the policy approach in SPP.

Key features or characteristics identified as required of the overall policy approach were that it should:

- Provide certainty to businesses and communities.
- Be flexible enough to respond to rapid economic change, including the changes which will result from technological advances.
- Promote policies that will tackle climate change.
- Protect the most important environmental assets from development.

It was suggested that, in preparing for structural economic change, the planning system needs to focus on improving the evidence base to support economic development in NPF4 and subsequent development plans. A far stronger focus on the evidence-led approach to economic development - including focusing on what is possible where - was seen as key to ensuring that aspirations are delivered and to ensuring society reaps the potential rewards. It was also suggested that as planning will need to address geographical disparities in the distribution of economic growth (as below), more assessment of what is happening at a regional level may be required.

In addition to being evidence-led, suggestions included that:

- It will be important for NPF4 to provide a clear delivery framework to maximise opportunities in the key economic growth sectors while recognising that the delivery of sustainable and inclusive economic growth requires the creation of a diverse economy rather than one overly focused on 'key sectors'.
- Planning should strive to be proactive, ambitious and not be constrained by the fear of causing political difficulties. The planning system is in a position to make bold and enlightened decisions on major projects and should take this opportunity.
- The delivery of inclusive growth will also require geographical disparities in the distribution of economic growth to be highlighted. NPF4 will need to be flexible in its approach to recognising that there are opportunities and challenges in delivering sustainable and inclusive economic growth which will vary across the country and future strategic investments require to be targeted recognising the distinct strengths of different regions.

Spatial disparities and challenges

Other comments also addressed variations across the country and the importance of NPF4 considering the needs of different parts of Scotland. The responses of local authorities or public bodies representing or working across different regions of Scotland often provided information on the particular challenges or opportunities affecting their area.

It was suggested that, for inclusive growth across the country to be achieved, NPF4 should both prioritise investment in areas where growth lags behind and also ensure a regional approach is taken to enable economic growth. It was suggested that RSSs will help with this.

One spatial disparity highlighted was that between east and west. It was reported that economic activity, investment patterns and associated demand for house building, contrasts significantly across Scotland, particularly in terms of an east-west divide across central Scotland. It was suggested that NPF4 should be informed by a revised national economic strategy that considers the disparity of investment and growth between the east and west coast areas of Scotland. Similarly, there was a call for the prioritising of rural and western communities to reduce population shift to the east of the country.

Another perspective was that the Glasgow-Edinburgh corridor dominates the Scottish economy and that a major objective should be to distribute economic activity and development more equitably throughout the country.

With reference to the Edinburgh and South East Scotland Region, it was reported that, although economically this region is the strongest and best performing in Scotland, this success is not experienced by everyone, and there are significant and persistent pockets of deprivation in the region. A successful future was seen as depending on a more inclusive distribution of the benefits of growth, so that it can reach those communities most in need.

It was suggested that, in order to improve prosperity and wellbeing in areas of Scotland which are lagging behind, NPF4 should provide the framework for more active regional policy, and should do this by:

- Reinforcing a coherent approach to the development of Scotland's regions, as set out in the Enterprise and Skills Review's workstream on Regional Economic Partnerships.¹³
- Supporting the alignment of spatial priorities and investment funding. It was suggested that Regional Partnerships will play a critical role in shaping the regional prospectuses and that, from the national perspective, NPF4 could focus on reducing the regional disparities that exist and encouraging investment opportunities towards economically 'cold areas'.
- Creating the conditions to support the proposals emerging from the Green Investment Portfolio. It was suggested that NPF4 could provide a framework to direct these opportunities where possible to the various communities and regions around Scotland which are falling behind in the post-industrial economy.

One note of caution was that, although there is value in planning for economic growth at a regional level, interdependencies within regions can also reduce economic sustainability at a local level and increase the prevalence of 'pockets of deprivation'. It was reported that this is beginning to be addressed in Scotland's Economic Action Plan¹⁴, which references 'the importance of every place in Scotland', suggesting increased investment in local economic growth to address inequality.

City and Regional Growth Deals and Enterprise Areas

With respect to whether NPF4 should take account of the generative opportunities resulting from City Region and Regional Growth Deals, comments included that existing Deals are expected to play a key role in enabling development and investment in certain areas, including by supporting regeneration and job creation and in connection with National Developments¹⁵. It was also suggested that planning has a key role in supporting City Region and Regional Growth Deals and needs to help make sure that local communities get the greatest benefit from them.

NPF4 was seen as providing the opportunity to ensure that City Region Deal and Regional Economic Partnerships are properly integrated with the development planning system. Suggestions as to how the approach should be taken forward included that NPF4 should:

- Drive the process and provide a strategic land use planning context for the individual project level developments.

¹³ Further information available at: <https://www.gov.scot/policies/economic-growth/enterprise-and-skills-review/>

¹⁴ Further information available at: <https://economicactionplan.mygov.scot/>

¹⁵ Further information on the nature of City Region and Regional Growth Deals and those currently in place is available at: <https://www.gov.scot/policies/cities-regions/>

- Identify national infrastructure priorities, which are then articulated in RSSs and LDPs then delivered through City Region Deals.
- Include an understanding of the intended economic outcomes and impacts of City Region or Regional Growth Deals, including identifying their planning and spatial implications. It was also suggested that, in considering this at a national level, NPF4 may also offer the opportunity to itself identify generative opportunities at a national scale.
- Ensure that while supporting the development of larger city regions through well-designed and targeted programmes, investment is also focused on the places and people potentially in danger of being left behind.

With respect to Enterprise areas, comments included that the initiative should be assessed to ensure that NPF4 meets its criteria and expectations and *vice versa*. It was suggested that the designation of and eligibility for Enterprise Area status should be looked at as part of the development of NPF4, and that it may be appropriate to refresh policy in order to enhance the attractiveness of locations to inward investment.

Connecting people to economic opportunities

The importance of connecting people to economic opportunities was highlighted by a number of respondents, with further comments including that planning must be responsive to how the different factors that influence the economy evolve. There was a call for this to be done in a proactive way, for example by:

- Recognising that access to opportunity is vital and that the inability to travel due to time or cost limits impacts on the most disadvantaged in terms of accessing employment, training or education.
- Increasing the opportunities to distribute employment to sustainable locations throughout communities by furthering support for diversification of town and local centres to accommodate businesses, providing jobs and institutions offering training and learning.

Further issues associated with business and industrial land or premises are discussed further below, but in this context, it was suggested that an approach focused on connecting people to opportunities could translate into:

- A shift of focus away from employment zoned land, including because this is often located in areas that are less easy to access by sustainable modes of transport.
- Redirecting more jobs and training to sustainable centres, with improved public transport. It was suggested that, while it may not be possible to provide job opportunities within every community, access to job opportunities within the wider area can be ensured through a well-connected public transport and active travel network in addition to the digital connectivity to allow flexibility in how people work and access employment.
- NPF4 exploring the promotion of employment activities in town centres in preference to employment designated lands and the repurposing of employment sites.

- Providing grant funding to local authorities to support economic development in disadvantaged areas.
- Public sector agencies, such as HMRC or the Scottish Government, dispersing back-office jobs to more rural areas and locations outwith cities.

In terms of links to placemaking, it was suggested that NPF4 should reinforce a whole system approach to place, and placemaking, by conveying a strong message that economic, business, health, and place outcomes are interlinked. It was reported that business in its widest sense often constitutes a key part of a successful and attractive individual place and that this message, and those links, need to be explicit within any document that seeks to put placemaking at the heart of it. Placemaking is covered further under the relevant theme.

Business and industrial land and premises

To enable planning authorities, and by extension LDPs, to allocate land which will meet the needs of various economic sectors, it was suggested that NPF4 should set out a process through which business and industrial land audits can be informed by:

- Up-to-date market intelligence, for example around take-up, availability and quality of existing business premises.
- Robust demand forecasting, in terms of quantity, location, size and quality of sites or new business units.

It was also suggested that active engagement and consultation with the business community through bodies such as Scottish Enterprise and the Federation of Small Businesses will be important.

It was reported that the annual take-up of economic land remains relatively low and, in a buoyant housing market, there is a persistent risk of challenge and change of use of allocated economic sites to housing. A Public Body respondent observed that, outwith their main city, market failure for the development of commercial property is almost total and that NPF4 needs to acknowledge these challenges.

Respondents also commented that changes to work practices (as discussed further below) will move many aspects of the economy online, and that this will affect the volume and type of business properties required. It was suggested that fewer offices will be required as the home working economy increases, and that retail will be almost purely experiential rather than practical and necessity based. However, it was also noted that manufacturing will remain a requirement, perhaps more so given the resilience-related messages to emerge from the COVID-19 crisis.

There was also a suggestion that many of the issues affecting the housing market, such as land and infrastructure availability and cost and construction costs, are all also relevant for commercial property, but that demand for commercial property can be very different to that for housing. It was suggested that there will be a continuing requirement to safeguard land for future economic development needs, and that economic development land should be seen as a long-term resource with short-term viability issues not allowing good employment sites to be lost. Suggestions regarding how this may be achieved included:

- Introducing a policy presumption against the loss of economic land to alternative land uses (outwith an LDP review).
- Public sector intervention in the market with planning taking a more collaborative approach to publicly owned land.
- Making developable land available for development should be an obligation for public bodies, to enable Enterprise Companies and local authorities to acquire land, service it and make it available to the private sector.

However, it was also suggested that while relevant policies must be prepared to protect existing business parks and premises, there should be flexibility to allow alternative developments if there is no ongoing demand within the sector currently using the premises and the buildings or a business park is unsuitable for any other business use.

More widely, it was seen as important that NPF4 supports a policy and regulatory framework that provides sufficient land for economic growth, including by promoting regeneration and redevelopment of existing under-utilised sites. This approach was sometimes connected with the importance of town and city centres offering potential in creating attractive working spaces for small and emerging business, including because they already offer access to transport and other facilities. It was suggested that further national incentives are needed to unlock city centres and enable flexibility in terms of how they are used to respond to the changing retail and working habits of the population. There was also a call for NPF4 to reinforce the 'town centre first' policy.

A specific suggestion was that consideration be given to updating the Use Classes Order to bring it more up to date with modern business practices and the changing nature of both city and town centres and business parks, technology parks and economic growth areas. This would allow more flexibility for the types of uses that are suitable and acceptable within these locations and ensure more control over what is now considered appropriate.

Other suggestions connected to how NPF4 or SPP should respond to issues related to business and industrial land and premises included by:

- Promoting job generation as the primary consideration in determining applications on economic land allocations.
- Requiring active travel and public transport links and services to be accessible to proposed development and to require off-site provision by developers to achieve this if required.
- Providing support for distribution centres linked to public transport routes/rail networks to support ease of access and delivery of goods.
- Using the masterplan consent area guidance (once agreed) to approve business developments instead of undergoing the full planning process.
- Using compulsory purchase powers.

New working models, including home working

A number of respondents commented on changing working patterns and their implication for the planning system, including meeting the key challenge of ensuring that premises and infrastructure meet changing business needs. It was suggested that the internet and e-commerce are likely to continue to be a key driver of economic activity, particularly with the trend of increase in remote working and including if daily travel is discouraged by climate change challenges and legislation. In particular, it was suggested that the trend toward home-working, widely seen as likely to be accelerated by the COVID-19 crisis, will lead to changes in requirements for both commercial and domestic properties. These were seen as likely to be around:

- Accommodating the need or preference for increased home or agile working as part of future development and investment. This may require a reconsideration of the size of houses and layout of residential developments as people seek additional space to work from home.
- There being more of a focus on mixed use developments which offer the potential to live and work in close proximity and which offer flexibility of use depending on demand.
- Requiring more central locations.
- The creation of more hub style business facilities, including office space hubs to accommodate local workers who may not have the facilities or desire to work from home but who wish to reduce their commute.
- Where the profile of business premises is not that required, taking a pragmatic approach to re-purposing developments for alternative uses.
- The regeneration of any derelict business land which is no longer suited to modern industrial purposes will be important.

The connection was frequently made between changes to working patterns and the need for robust and easily accessible digital infrastructure. It was noted that this requirement will apply not just to new developments, but also to existing areas and there was a view that, as the pace of change increases, the ability of this network to be easily and frequently upgraded should be a principal consideration. These issues are considered further under the *Digital connectivity* theme.

There were calls for legislation, policy and guidance to reflect these changes, including by facilitating, supporting and, where necessary, directing development. In terms of some of the best mechanisms for taking this agenda forward, comments included that:

- A national review and strategy would help inform local authorities' approach and should give consideration to any planning policy implications and principles including for live/work units. The national strategy should provide high level principles and allow regional and local strategies to be responsive to their situation.
- The changes required can be taken forward through Development Management policies. One local authority respondent reported that their LDP has a policy around ensuring that home working does not have any

detrimental effects on the residential amenity of neighbouring properties. The connection was made to thresholds for material change of use remaining relevant (see further below).

Other comments relating to new models of working included that:

- Social connection should be enabled through how we create spaces to promote collaboration and socialisation to the benefit of the health and wellbeing of the workforce.
- The Scottish Government should strengthen its policies and incentives to enable and encourage businesses to expand home working, including to facilitate the dispersal of employment opportunities across the regions of Scotland.

Finally, it was suggested that a wider distribution of small businesses set up and working from business hubs and private homes across the country will be challenging for the planning system to respond to, as it will be more difficult to measure and support business development in this more disparate geographic form.

Responding to challenge - COVID-19 and Brexit

Beyond the impact on working patterns, the challenges that the COVID-19 crisis creates for the economy, including in relation to business and employment, were highlighted. It was suggested that the Place Principles will be key to the planning system's support of recovery, and that it is essential that NPF4 provides a framework of the key principles of good practice in the context of spatial planning for workplaces and locations.

However, it was also suggested that some of the answers to how to rebuild the economy will only emerge as the impact on different sectors, including on self-employment, becomes clear. Initial concerns included that transport, tourism, high value food, drink and manufacturing exports, SME businesses and the construction sector may be particularly badly affected, with the connection made between these sectors and rural and island economies.

It was also suggested that Brexit brings specific risks to island authorities, including because they benefit currently from high levels of support from a wide range of EU funding initiatives and because a high proportion of the island workforce is employed in Brexit sensitive industries.

Although very real concerns were highlighted, opportunities were also identified, including that in one area, recent investment in telecommunications infrastructure and e-schooling demonstrates the very real opportunities for high-value work, for example in the financial, legal or technology sectors, to be undertaken from home. The potential to build on such opportunities in a wide range of educational sectors was also highlighted.

In terms of COVID-19, the potential to support a green recovery, including by maximising the role of nature-based solutions in a new economy and supporting

lower carbon lifestyles with the long term benefits they bring, was highlighted (and is discussed further below).

Rural and island economies

The particular challenges and potential around supporting business and employment in rural and island locations were highlighted. It was reported that the leading recommendation from the National Council of Rural Advisers' *New blueprint for Scotland's rural economy (2018)*¹⁶ was that a vibrant, sustainable and inclusive rural economy can only be achieved by recognising its strategic importance and effectively mainstreaming it within all policy and decision-making processes. It was suggested that NPF4 needs to recognise that the context and challenges are different in rural and island areas.

Further comments included that NPF4 should take the Islands Deal into account and should support businesses and employment in all settings including rural and islands. It should:

- Recognise that island and rural areas can support centres of excellence reflecting regional specialisms, such as aquaculture technology, on and offshore renewables and community led economic development.
- Promote rural and island areas as centres of excellence for 'non-traditional' rural sectors such as advanced manufacturing, digital technologies, and e-commerce, as part of a wider Economic Strategy.
- Encourage sectoral diversity and recognise the opportunities for growth in non-traditional rural industries at all levels. This is particularly relevant for sustaining communities in remote rural villages where an increase in self-employment, community land ownership, home-working and croft diversification has led to a move towards small scale economic proposals within rural settlements.
- Create communities of interest (hubs, digital and/or physical) where collaborative and co-operative endeavours can be encouraged and supported by government agencies. These should be used to incubate and promote new start-ups.
- Recognise that the viability of small schemes in rural communities should not be impacted by unnecessary mitigation. NPF4 should explicitly state that implementation of such policies should be flexible in a rural context.

Possible growth sectors

There were a number of references to particular sectors that may offer the potential for growth going forward, including in relation to job creation. There was a call for NPF4 to set out a framework to stimulate and encourage job creation and income generation, including to replace jobs lost in the fossil fuel-based industries. It was reported that recent research indicates that only 28% of Scottish employment is in

¹⁶ Available at: <https://www.gov.scot/publications/new-blueprint-scotlands-rural-economy-recommendations-scottish-ministers/>

key sectors¹⁷ and it was suggested, therefore, that inclusive growth is more likely to arise in the non key sectors.

Specific suggestions included focusing on the low carbon, green economy. The potential of low carbon sector businesses was highlighted, including in relation to world-class training and research facilities. In addition to the wider green economy, there were specific references to NPF4 offering the opportunity to create a positive development context for renewables which can help in promoting investment in renewable technologies and development on the ground. It was suggested that affordable renewable power could transform Scotland's economy in the medium and long term, with a specific proposal for the establishment of a new social enterprise, such as The People's Energy Company.

The revolution in renewable energy, and other technologies and innovations, was seen as providing a significant opportunity to address occupational segregation in STEM sectors in Scotland and to integrate women's equality issues throughout its approach to tackling climate change.

Other sectors identified of offering potential for growth included:

- Agriculture and food industries, including the potential identification of agri-business corridors. There was also reference to potential to focus on producing climate-resilient crops and sustainable packaging.
- Leisure and tourism, including by benefiting from peoples' preference to reduce the distances they travel and the potential increase in popularity of 'staycations'. The potential of the sustainable tourism and eco-tourism markets was highlighted, along with the need to ensure the necessary infrastructure is in place to support sustainable tourism.
- The blue economy, including a focus on sustainable marine and coastal development. Connections were made to offshore renewables, aquaculture, and coastal infrastructure and to the potential for NPF4 to support these areas.
- The construction sector, including around tackling the skills shortage across the county to undertake energy efficiency measures and retrofitting. Also, addressing the pipeline and skill set needed to benefit from modern methods of construction such as sustainable modern methods of offsite construction.
- The engineering, architecture and design industries, including because of the opportunity to innovate and produce energy efficient buildings.
- Education and research and development, including by making the critical links between education, research and development, innovation and the public sector.
- The emerging space industry.

¹⁷ Available from the Scottish Futures Trust website at:
<https://www.scottishfuturestrust.org.uk/storage/uploads/sftassessingdemandforcommercialdevelopment.pdf>

Energy - Electricity

Proposed key objectives of NPF4: To maximise the contribution of renewable electricity generation to meeting our net zero target in a sustainable way.

There was support for the proposed key objective, although with caveats including that the meaning of ‘a sustainable way’ should be clarified and that there must be more progress on other technologies in addition to wind, or that there should be a mix of renewables. A whole system, infrastructure-first approach was recommended, with a focus on reduced demand and increased energy efficiency, then meeting residual need from green technologies. The need to align NPF4 with the Energy Strategy was also noted.

Several respondents emphasised the need for NPF4 to make clear that meeting 2030 targets will require a significant increase in the generation of renewable energy with some arguing that, at present, the planning process does not place sufficient focus on responding to the climate emergency. It was proposed that NPF4 should provide explicit support for renewable energy developments as both sustainable and in the long-term public interest and, specifically, that the weight attached to visual impacts in planning decisions should be reduced. Further, it was suggested that the urgency is such that there should be interim policy guidance ahead of NPF4 being finalised to ensure greater weight and priority are given to low carbon energy developments as soon as possible.

National Development status was proposed for National Energy Infrastructure, with a suggestion this should cover the full scope of infrastructure needed including for energy storage, transmission, interconnectors and strategic electric vehicle charging points. National Development status was also suggested for all renewable energy projects over 50MW.

A rather different perspective was that the need for renewable energy must be balanced against the need to protect natural habitats, historic sites, landscapes and communities. Expressing a view that a planning authority should be able to identify areas where there is no further capacity for development, one Local Authority respondent observed that this means accepting that local landscapes are important and that a community’s sense of place should not be dismissed when balanced against the need for renewable energy generation.

It was also argued that the existing policy approach of ‘the right development in the right place’, should continue to be the over-riding principle in NPF4, rather than what was viewed as a risk of ‘development at all costs’.

General features of the planning system

Some respondents commented on general features they would like to see in the planning system including:

- Consistency of approach, both between regions and government agencies so developers can be clear on requirements regardless of the planning authority.

- Shorter timescales. It was suggested measures of performance should be introduced to monitor the efficiency of the planning process, for example through adoption of a code of practice or, introduction of statutory timescales.
- Proportionate EIAs. It was suggested the level of detail being requested in EIA reports goes beyond the intention of the relevant regulations. It was also argued there should be a distinction between reporting significant effects in an EIA and the decision-maker's role in determining whether such significant effects are acceptable.

Grid infrastructure

As well as raising issues about planning for specific types of renewable energy (outlined below) there were frequent references to the need to improve grid infrastructure and capacity and for the planning system to provide support for new and reinforced grid infrastructure. However, it was argued that decisions on national grid infrastructure are separate from the planning process, and sometimes the implications of consenting a proposal on grid infrastructure is not clear. A national capacity study was advocated as was retaining the existing National Development status for transmission infrastructure.

Further suggestions included:

- Prioritising renewable developments in areas where existing grid connections are available.
- Consider including transmission companies as statutory consultees for new renewable energy developments.
- Investment in electricity interconnectors with continental Europe – providing access to low or zero carbon sources of generation and selling our surplus energy.

Rather than looking to upgrade capacity of the electricity grid to allow long range transmission with associated losses, it was also suggested there should be investment in local generation of power and moving energy-intensive businesses closer to where the electricity is being generated. Local generation is discussed below.

Energy storage

There were many calls for NPF4 to support development of energy storage capacity. Energy storage was argued important not only to support delivery of power from renewable sources but also to provide additional resilience for the national grid and was suggested to be a National Priority. Ensuring consents for energy storage developments are favourable where located in suitable locations was proposed.

It was proposed that NPF4 should create a policy framework supporting battery storage developments, including relevant considerations such as suitable land use classifications, environmental impacts and impacts on residential amenity.

Specific suggestions with respect to energy storage included:

- This should be required as part of design process for larger projects.
- Storage centres should be established in all new homes.
- Opportunities for retrofitting energy storage capacity to existing windfarms should be considered.

In general, co-location of compatible technologies – typically wind, solar and storage – was suggested to need greater focus.

Issues for specific sectors

With respect to potential sources of renewable energy there were specific references to offshore wind, solar, hydro, tidal, hydrogen, and energy from biomass and from waste, all of which are discussed below. However, the majority of responses on delivering electricity – some of which were very substantial - related to issues around planning policy relating to onshore wind.

Onshore wind

While the importance of onshore wind was often acknowledged, there were differing views on the extent to which it should be prioritised. In addition to the request for explicit support for renewable energy developments referenced above there were calls for the planning system to allow for:

- Presumption in favour of consent for renewable energy projects
Strengthening of the wording or the weight of the presumption set out in the existing SPP were proposed, and that NPF4 should make it mandatory for all planning determinations to explicitly address the application of the presumption in favour.
- Consents in perpetuity
Now issued for 20 - 25 years it was argued consents should be in perpetuity, with limits put in place only if planning authorities demonstrate exceptional circumstances.
- Repowering
It was suggested that NPF4 should provide a definition of repowering and provide considerations when dealing with repowering applications. Presumption in favour of repowering and life extensions were also proposed with a fast track process not requiring a full planning application, but subject to an EIA where required. It was also argued that the baseline for an EIA at a repowering site should be that of the existing wind farm and not a greenfield or fully decommissioned/ restored site.
Further, it was argued consents should no longer include restrictions on total generation, and that developers should be able to deploy within broad physical constraints without requiring to vary consents or to update environmental assessments.
- Extensions to existing sites
Extending sites was argued to make best use of existing infrastructure and so to provide benefits in terms of sustainable development. Less visual impact than a new development was also suggested.

- Modern/taller turbines

Taller towers, larger rotors, and increased blade tip heights should be acceptable, and each site should be assessed on its merit. Further, limited weight should be afforded to scale disparities between existing and proposed turbines when sites are repowered and blade extensions should be supported and considered for permitted development rights. It was argued that some consented but unbuilt capacity may need to be reconsented with modern turbines if it is to be viable, and also that larger turbines can look better, depending on the environment. There should also be flexibility with respect to future technological developments.

However, there was also concern regarding the prospect of more and taller turbines including in relation to their impact on historic assets from greater distances.

A further concern was expressed with respect to reports of negative impacts of noise and shadow flicker from turbines on those who live nearby. It was argued that control through the planning system is needed to give communities the confidence that problematic development can and will be addressed.

Spatial strategy and spatial frameworks

There were calls for NPF4 to include spatial planning for renewable energy identifying priority areas for onshore renewables and for onshore wind in particular, taking a more national approach to strategic capacity for new wind farm development. In particular, it was suggested that identifying priority areas where onshore renewables might be considered would allow some forward planning for the network in a way that is not always possible under the current LDP-led system.

However, there was also opposition to preferred areas for onshore wind as it was argued these would be landscape led. It was also suggested that, in Wales, the allocation of land for the development of onshore wind farms has not been successful and has failed to deliver the necessary scale of development, so should not be replicated in Scotland.

Although incorporation of existing spatial frameworks into NPF4 was advocated, there were also arguments for changes to the existing frameworks set out in Table 1 in SPP.¹⁸

Specific suggestions included:

- Applying a 'presumption in favour' to Group 3 areas.
- Reviewing or removing the Group 2 status of Wild Land.
- Moving World Heritage Sites from Group 2 to Group 1 since, for most sites, a strong landscape context puts them on a par with National Scenic Areas.

¹⁸ This requires planning authorities to identify three groups: Group 1 - Areas where wind farms will not be acceptable; Group 2 - Areas of significant protection; and Group 3 - Areas with potential for wind farm development. (Further details available at <https://www.gov.scot/publications/scottish-planning-policy/pages/6/>) Wild Land areas are in Group 2.

- Alternatively, resist elevating World Heritage (e.g. Flow Country¹⁹) Sites to Group 1 as this would significantly constrain onshore wind in Highland region.

It was also argued that, outside Group 1 areas, decisions should be made on a case-by-case basis, rather than through the application of constraint-based mapping within LDPs.

Policy on Wild Land Mapping

Concerns were raised regarding the inclusion of Wild Land within Group 2, including because there is no formal designation for Wild Land. Further, it was argued that the requirement set out in paragraph 215 of SPP has proved too high a bar for any wind energy scheme to satisfy²⁰ and it was suggested this might be reworded. It was argued that there has effectively been a blanket ban on developments on or near Wild Land and peatland areas, despite some developments being supported by local planning committees. Some respondents – including Community Councils – raised issues regarding the extent of land already designated as Wild Land in Sutherland in particular, and it was argued any further protection could have a detrimental effect on the economic development and social sustainability of some areas. There were calls for Wild Land boundaries to be ‘pulled back’ in areas where wilderness qualities are more limited or, specifically, for reassessment of the 2014 SNH map to reduce Wild Land areas in both scale and number, while still ensuring protection for the wildest areas.

Issues concerning buffer zones were also raised, with a suggestion that these should be abandoned.

Landscape capacity studies

There were calls for review of the role of landscape capacity studies which, it was argued, do not reflect the urgency of the climate emergency, are often out of date, and are often misinterpreted or misused. It was suggested that there are many instances where use of landscape capacity studies to refuse applications has been overturned on appeal and that such studies should be removed or demoted so they are not given as much weight, but used more as a guidance tool. Landscape sensitivity studies that identify relative sensitivities within the landscape were frequently argued to be more appropriate.

However, it was also suggested that some areas are reaching their capacity for onshore wind and, in such circumstances, LDPs should have the ability to say so.

Other issues

Among other issues suggested for inclusion in NPF4 in the context of planning for onshore wind development were:

- Resolution of the exclusion zone around the Eskdalemuir Seismic Array.

¹⁹ The Flow Country in Caithness and Sutherland is the only UK nomination for World Heritage Site going forward to UNESCO for a decision next year.

²⁰ Paragraph 215 reads: In areas of wild land development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

- Development of a more strategic approach to mitigating impacts of wind development on civil aviation radar.

Offshore wind

A greater support for offshore wind was suggested, including to alleviate pressure for further onshore development. However, it was also reported that existing export capacity is already fully subscribed, leading to regular periods of curtailed wind output due to lack of network capacity. It was considered that NPF4 should make clear links to the Sectoral Marine Plan and Offshore Wind Policy Statement and should ensure provision of the necessary onshore facilities including cables, substations and port infrastructure. 'In principle' support for such installations was proposed, as was National Development status for onshore infrastructure associated with offshore wind.

It was also suggested that NPF4 should recognise the potential for floating offshore wind. Although it was observed that floating wind provides an opportunity for a leading role for Scotland, it will require long term support and a pipeline of projects with reasonable time scales to aid delivery.

Tidal

Among advocates of tidal power, it was suggested that this is predictable, would do little damage to the landscape and presents a major future source of renewable energy for Scotland. In particular, it was argued there should be further research on tidal stream generators.

Solar

There was suggested to be significant growth potential for all forms of solar energy development in Scotland and it was argued that NPF4 should create a supportive policy environment, including for co-location of solar and energy storage. However, it was also noted that the policy paper makes no direct reference to solar power.

It was observed that lower sunlight levels and more challenging terrain and wind speeds than in other parts of the UK may reduce the number of suitable sites and the economic viability of solar power in Scotland. Key constraints to attracting more large-scale solar were suggested to be very high planning application costs and a lack of grid capacity at locations that are suitable for solar. Suggestions included:

- Streamlining elements of the planning process. It was suggested that both EIAs and zones of theoretical visibility studies might be simplified for solar developments.
- Encouraging local authorities to use their discretion in relation to both community benefits and non-domestic rates for solar developments.
- Presumption in favour of solar on brownfield sites.
- Reconsideration of extending permitted development rights to larger roof mounted and to larger-scale ground-mounted solar.

In addition to conventional solar farms or roof mounted panels a range of new solar technologies were highlighted – building-integrated solar, floating solar, solar roads and solar carparks with onsite electric vehicle charging.

Hydro

Suggestions with respect to hydro included that NPF4 should:

- Provide a supportive policy framework for the development of new and existing pumped storage hydro schemes including continued recognition of pumped storage hydro schemes as nationally important or affording National Development status to all pumped hydro. Retaining Cruachan 2 as a National Development project was also proposed.
- Support the development of small-scale hydroelectric schemes by making a requirement to conceal pipelines proportionate to the scale of the scheme, subject to a visual impact assessment in Group 1 areas.

Hydrogen

The importance of aligning NPF4 with the forthcoming Hydrogen Policy Statement and Hydrogen Assessment Project was highlighted as was the need for land and facilities for hydrogen manufacture and storage. It was suggested suitable sites will be in industrial or port locations and will be licensed and regulated for containment of flammable gases.

The opportunity for hydrogen hubs to co-exist next to existing oil and gas nodes was also highlighted, with a suggestion that existing nodes might be granted permitted development status for green hydrogen production.

With respect to distribution of hydrogen it was suggested that decisions on the scale of hydrogen network infrastructure should consider economic and technical factors in determining the benefits of national versus regional networks. It was also observed that although the gas grid in Scotland cannot carry hydrogen at present, it could carry hydrogen-enriched natural gas as a short-term measure.

Other energy sources

It was suggested both that biomass should not be considered fully renewable and that there should be no approval for large biomass plants. Issues associated with obtaining energy from waste by anaerobic digestion are considered under the *Waste* theme.

Decentralised generation, small scale and community energy

There were calls for NPF4 to promote decentralisation of electricity generation, including small scale local and off-grid production as well as promoting community energy and energy co-ops. It was suggested this could support a just transition to a low carbon energy system, create local employment, enhance community empowerment, reduce transmission losses and help to relieve pressure for further development in upland areas. The need to improve grid capacity to receive locally generated electricity was highlighted, although it was also suggested it should be possible for locally-generated energy to be used locally.

Specific suggestions included:

- Solar panels or wind turbines should be required in new build housing developments.

- Non-residential developments above a certain size should be required to include a new renewable source of electricity supply.
- Photo voltaic panels should be mounted on buildings such as schools or leisure centres for community benefit.

National Development proposals

In addition to proposals for the generic National Development projects noted above, National Development status was also suggested for specific types of energy generation, for example solar photovoltaic, or for energy projects, hubs or transition zones.

Energy - Heat

Proposed key objectives of NPF4: To maximise the contribution of renewable heat generation and systems to deliver renewable heat (such as district heating, electrical network upgrades) and reduce the cost of delivering this transition (such as supporting heat and electrical storage systems) to meeting our net zero targets in a sustainable way.

There was general support for decarbonisation of heat, although this was suggested to be one of the biggest challenges for achieving Scotland's net-zero carbon target and to require widespread roll-out of low carbon heating for homes. It was suggested that the increased grid capacity required for the electrification of heat should be a priority at both regional and national levels.

There was support for LHEES to become a statutory duty through NPF4 and calls for clarification of the relationships between LHEES, LDPS and LHSs. The importance of renewable heat network zones identified in LHEES being integrated into LDPs was highlighted, as was the need for a clear delivery plan.

It was reported that although LDPs may incorporate policies regarding heat networks, major housebuilders often argue these are not feasible for technical or economic reasons. Stronger policy was suggested to be necessary to allow local authorities to 'require' developments to contribute to net-zero rather than just to 'encourage' them to do so. It was also argued that if developers are not required to deliver zero carbon developments, competitive bidding for land will put those who seek to do so at a disadvantage. Using NPF4 to provide greater clarity on the role of the planning system in reducing carbon emissions from new development was suggested to be important in support of strengthening of Building Standards, and the need for alignment of new planning guidance with new Building Standards was noted.

There was support for heat networks and a welcome for the Heat Networks (Scotland) Bill. A national heat network policy to support planning authorities in requiring heat networks within new development was also proposed. The need for master planning of district energy and a framework for projects involving multiple landowners, properties and utility companies was also suggested to be necessary in order to create networks between adjoining uses and developments. It was argued statutory powers are required to connect across land not in Council ownership outwith the development site.

It was also noted that when the Heat Networks Bill comes into effect, the district heating industry will be conveyed with similar rights of servitude as other utilities and that this should be recognised by NPF4.

There was agreement that NPF4 should raise the profile for heat networks and create a favourable planning regime for the roll out of renewable heating across Scotland, and a suggestion this should be considered a National Development. However, it was also observed that district heating will not be viable in some areas – particularly where population densities are low - and it was argued that the focus

of NPF4 should be on low carbon heat in general and taking a flexible approach going forward. Identifying the optimal measures for each location was suggested to be important.

Among comments on reasons that delivery of heat networks has been limited to date were that they may be seen as too complicated and not cost-effective, and are not popular with the general public. It was suggested that Historic Environment Scotland's review of its estate is welcome and could be used as a case study. A Development, Property or Land Management Company respondent noted concern that customers can become trapped into expensive schemes with long-term and expensive maintenance requirements and are unable to switch supplier.

Suggestions with respect to promoting heat networks included:

- A presumption in favour of heat network projects.
- Amending permitted development rights around the installation of heat network pipes to align heat network operators with other utility providers.
- A National Green-Blue Infrastructure Network would highlight the opportunities for renewable heat networks at a national, regional and local scale, including the currently untapped energy potential of Scotland parks and greenspaces.
- Consideration for permitting zero carbon development in locations that would otherwise be considered unacceptable – such as on green belt sites.
- Eliminating business rates for heat networks.
- Providing centralised expertise to planning authorities to assess proposed schemes.

Several respondents made specific recommendations with respect to requirements for new developments, including that:

- An energy statement should be required for new developments, and relevant standards should be defined. The statement should set out how renewable heat/heat networks will be used and should be clear that a strong justification is required for not making use of renewable heat/heat networks.
- Intentional and consequential venting of heat to atmosphere should be restricted in all new developments with limits set at as low a level as possible.
- All proposals for new development should provide their primary heating requirements from renewable sources and assess their suitability for connecting to a nearby renewable heat network, where one is or is likely to be available.
- Connections to renewable heat networks should be required for new developments located within heat network zones or should be required for larger developments.
- NPF4 requirements in relation to renewable heat networks should apply to all scales of development and to consequential improvements.
- Development could be 'future proofed' if suitable networks are not immediately available/viable.

It was argued that the infrastructure associated with heat networks should be recognised in the same way as that associated with other utilities and should be noted in LDPs. Recognition of the need to retrofit such infrastructure within mature urban environments was suggested to be of particular importance.

With respect to existing properties, it was suggested a substantial price differential may be needed to encourage individual installations which could be disruptive, and it was recommended that NPF4 consider how to encourage retrofitting. It was also argued that retrofitting should not be rushed, to ensure measures are appropriate and do not need to be replaced in the short term.

Other low carbon technologies

Although the majority of responses concerned heat networks, there were also limited references to other forms of low-carbon heating such as:

- Heat pumps: Specific suggestions included: large ground source heat pumps to serve several houses; water source heat pumps; and hybrid heat pumps.
- Hydrogen: There were calls for a high-level hydrogen policy supporting uses of hydrogen as an alternative fuel for purposes including heating, cooking, transport and for industry, although it was noted that the technology is still relatively immature. Continued support for research and development, in tandem with development of commercial applications was suggested, and the challenges associated with hydrogen storage and the infrastructure for hydrogen networks were noted. Identifying opportunities for local generation of hydrogen was also proposed.

Points on energy from waste are considered under the *Waste* theme.

Mineral extraction

Proposed key objectives of NPF4: To safeguard workable resources and ensure that an adequate and steady supply of aggregates is available to meet demand whilst ensuring that the impacts of extraction on local communities, the environment and the built and natural heritage are properly addressed. The policy will also reflect the Scottish Government's finalised policy position on unconventional oil and gas.

General comments on extraction of resources included that there is a case for addressing this issue at a national and/or regional level as it is not an area of specialism for many authorities.

It was also suggested policy on extraction of resources should:

- Reference policy on the circular economy, reduction of waste and the waste hierarchy.
- Address how development of mineral sites relates to climate change mitigation and the net-zero carbon agenda– for example by requiring a 'Sustainability Statement' as part of the planning process.

Fossil fuels

Several respondents referred to the Scottish Government's position of no support for unconventional oil and gas with comments including that this should be set out clearly in NPF4. There was support for the Scottish Government's decision, which was noted to align with the decarbonisation agenda and with climate change targets.

Some respondents argued the policy position of no support for unconventional oil and gas should be extended to cover all new fossil fuel extraction, including manufacture of fossil hydrogen and fossil fuel generation with Carbon Capture and Storage (CCS). It was argued that any further consents for fossil fuel extraction would be incompatible with the Scottish Government's climate change targets and legislation and there was a call for public incentives and investment in the fossil fuel industries to end by 2025.

With reference to the text of NPF4 it was suggested that:

- Reference to fossil fuel in terms of improving energy security should be removed.
- The requirement to safeguard areas of search for coal should be removed.
- While coal is being extracted a policy on opencast coal extraction is still needed.

Whether development plans will no longer be required to safeguard fossil fuel deposits from sterilisation was also queried.

Extraction and restoration

The need for NPF4 to include a policy framework for the safeguarding of workable mineral resources while protecting local communities, the environment and the built and natural heritage was highlighted.

In terms of the impacts of extraction and restoration of mineral sites, it was suggested that:

- It should be clearer that impacts should be avoided and minimised in accordance with the mitigation hierarchy. Consents for mineral extraction in sensitive wildlife areas should be avoided and there should be no consents that rely on complex restoration solutions as part of impact mitigation.
- Criteria-based policies should ensure that development is always carried out in a sustainable manner, including avoiding sand and gravel extraction from coastal sites.
- Small scale quarrying for sand would cause little environmental damage.
- Applications for any new sites should be subject to full survey, assessment and mitigation.
- Significant weight should be given to impacts on natural heritage and there should be a requirement for net biodiversity gain.

While the potential benefits of habitat creation on restored mineral sites were highlighted, it was also reported that the collapse of the open cast coal industry has left a number of sites unrestored/remediated. It was recommended that NPF4 should:

- Require fees to be secured for monitoring surface coal mines in line with The Town and Country Planning (Fees for Monitoring Surface Coal Mining Sites) (Scotland) Regulations 2017. Put a system in place for monitoring and enforcement - for both activity on site and the value of the funds.
- Include a requirement for adequate funds to fully restore sites and withhold consent for development which requires ongoing mitigation or restoration until the finance for mitigation/restoration is in place. It was also suggested both that subsequent permission to develop land forming part of a habitat management area should not be permitted and that restoration plans should be flexible.

Reserves and future demand

Views on Areas of Search included that:

- These are unhelpful and should be removed.
- A criteria-based approach would be more practical or would be appropriate in certain circumstances.
- Favoured areas of search would provide more certainty to developers and stakeholders.
- Sensitive environmental sites should be excluded from favoured areas of search.

A requirement for a minerals audit to verify that a ten-year (or at least adequate) supply exists was suggested to ensure that sufficient materials are available. One Local Authority respondent, who noted they had found it difficult to plan in the absence of enough information on future demands from industry, argued a criteria-based approach would be preferable. Another suggested that limited information on workable reserves for aggregates is available in some local authority areas and that the onus should be on operators to provide evidence to justify further workings or extensions to existing workings.

With reference to land banks, comments included that moving to a ten-year development plan will not have implications since councils are required to have a ten-year mineral land bank of reserves for construction aggregates. The maintenance of land banks was also suggested to be best addressed at a regional level.

Rural development

Proposed key objective of NPF4: To promote rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality.

With respect to rural development there were calls for:

- Clear direction regarding the objectives of rural planning policy, linked with national land use policy to support objectives around inclusive economic growth and depopulation of remote rural areas.
- Planning authorities with rural areas to be required to develop specific rural development and rural planning policies that take account of the needs and nature of rural areas.
- 'Island proofing' of NPF4 to ensure that the new framework takes account of island circumstances.
- Guidance on major industrial developments in remote rural areas. The current debate around remote rural locations for a space hub was suggested as an example of where a national planning framework should be the key determining factor in planning casework.
- Thinking about development in the broadest sense as including green and blue infrastructure and including 'ecological restoration' as a category for development in NPF4.
- Identification of how nature-based solutions can underpin and support rural development in RSSs and LDPs.
- Additional training on rural planning and development for officers and officials.

Some Local Authority respondents commented on individual recommendations made in 'Rural Planning Policy to 2050', a research study carried out in 2019 for the Scottish Government.

NPF4 and the Land Use Strategy

It was noted that the character of Scotland's rural landscapes is only partly influenced by built developments and significant change can be caused by land uses such as agriculture and forestry that are not controlled by the statutory planning system. Therefore, it was argued NPF4 should sit explicitly within the overall framework provided by the Land Use Strategy, and that a clear explanation of the relationships between the Land Use Strategy, NPF4 and their respective regional implementation mechanisms must be provided.

There were also calls for:

- NPF4 to seek to coordinate closely with the Land Use Strategy and forthcoming Regional Land Use Frameworks.
- Landscape-scale restoration as a model for development plans that could help to co-ordinate policies across planning, land use and land reform agendas through Regional Land Use Frameworks.

Increasing the population in rural areas

There was support for using the planning system to stem depopulation in sparsely populated areas, although it was also argued NPF4 should be clear that encouraging people to live in rural areas relates to remote areas where population decline is an issue, while accessible areas close to towns and cities require continued protection from unsustainable development. It was proposed NPF4 should identify and promote depopulated areas in which repopulation is an objective. Having accurate, up-to-date information on population changes in individual areas was thought to be important.

Among requirements highlighted as necessary for rural populations to be maintained or increased were:

- A balanced population profile, with economically active people encouraged to live in the area.
- Sufficient housing, particularly in areas where there is under supply.
- Employment and educational opportunities, with an associated requirement for good digital connectivity.
- Other infrastructure, including with respect to transport, schools, shops, access to healthcare services and community facilities.

The need for a strong emphasis on how to bring multiple benefits to depopulated areas was suggested as was a rural infrastructure first approach, with longer term strategic planning to address issues such as transportation, health and education. Stronger links between planning, housing, infrastructure and economic policies were argued to be necessary if ambitions for rural areas are to be successful.

The availability of land was argued to be critical to securing long-term renewal of remote rural populations and it was suggested NPF4 must have regard for any Land Rights and Responsibilities Statement or strategy for land ownership or use prepared by Ministers.

The need to balance a desire for rural development against potential impacts on the countryside and on wildlife was also highlighted, and it was noted a reduced population in areas that are heavily dependent on private car use can have a positive impact in lowering carbon emissions. Greater emphasis on the sustainable element of the key objective was suggested, and an indication of how important the goal of populating rural areas is in relation to the impacts on the environment needed to achieve it.

It was also argued rural development should not be considered unsustainable because car journeys are required and that making private car journeys carbon neutral is an achievable goal for Scottish Government. A rural-first approach to roll-out of electric vehicle charging infrastructure was suggested.

Classifying rural areas

It was suggested important to continue to differentiate between different types of rural areas, and to recognise that rural areas close to towns and cities may experience very different pressures, including concerns of an increase in *ad hoc*

residential development, or creating commuter housing in attractive areas of countryside.

It was recommended that:

- Different types of rural area should be clearly defined in NPF4, and related policy should be more prescriptive about the types and scales of development that should be permitted.
- NPF4 should provide a broad policy framework for each rural typology, within which planning authorities should have the freedom to set down detailed, locally sensitive criteria in LDPs.
- If the intermediate area is to be retained, then guidance is required to allow planning authorities to identify this area within their plans.
- Island and Sparsely Populated Areas should be represented as distinct types of rural area.
- Classification could be improved by being evidence-based, allowing development of place-specific policies which would provide appropriate support and guidance for each of the rural areas.
- Classifications that indicate the dominant/primary income streams or industries/sectors supporting different rural communities would be useful. These classifications could be used in Regional Land Use Frameworks and could help incentivise the right developments in the right locations.

A clear methodology for helping authorities to characterise the different parts of their area was also suggested to be useful and there was a call for better protection and management of rural landscapes - not only those designated as protected landscapes but also the wider countryside.

More permissive policies to support sustainable development

It was suggested care is needed if considering a more permissive approach and that a 'one-size-fits-all' national approach will not be appropriate. Policies that are too permissive were argued to risk eroding the character of the countryside and harming the environment.

It was also argued that the planning system should include a presumption in favour of sustaining rural populations and should be more flexible and less demanding in rural areas. Planning should recognise challenges of development in the rural context and take flexible approaches to allow challenges to be overcome. In particular, it was argued development should be enabled in some areas which have not previously been considered suitable, giving much more weight to impact assessments in the decision-making process.

Other suggestions included:

- Mechanisms encouraging mixed use proposals in rural areas should be promoted.

- A more permissive policy approach is required for settled rural areas in order to support and facilitate development, balanced with more management in the remoter areas, out-with settlement and offshore unhabituated islands.
- A move away from a policy position of preventing the expansion of those settlements with an identified settlement boundary towards a more individual place-based approach.

Supporting local businesses to develop and diversify

There was a call for planning to support the viability of land-based industries wherever possible including to help businesses, land managers and farmers expand or start new enterprises. It was argued that traditional land-based industries continue to play an important role, especially in remote and sparsely populated areas and their development should be supported.

It was also suggested that rural and island areas should be promoted as centres of excellence and innovation for 'non-traditional' rural sectors that champion environmental sustainability.

As in other contexts there were calls for improved digital connectivity as a means of supporting local businesses in rural areas and as providing the capacity to work from home.

There were calls for a focus on food production, integration of food into the planning system and for greater protection for agricultural land. Specifically, it was suggested that:

- Wording in current SPP which allows development on prime agricultural land 'where it is essential as a component of the settlement strategy' should be removed in NPF4.
- Wording should be changed to include good agricultural land (class 3.2) specifically, instead of just prime agricultural land (classes 1 - 3.1).
- A soils framework could identify areas that can contribute the most to sustainable food production and ensure the planning system recognises their value.

It was also argued that SPP goes too far in protection of agricultural land, especially with respect to land that is not of prime quality.

The need for adoption of more sustainable farming practices was also argued, with suggestions including.

- Government support to enable farmers to access local markets.
- A network of research and demonstration sites for sustainable farming.

Application of a Natural Capital Protocol for land-based businesses was reported to have encouraged land managers to consider natural capital enhancing and low-carbon alternatives in decision making.

Proving funding mechanisms for a new Scottish Rural Development Programme that aims to deliver landscape quality outcomes, and increase partnership working

and community-led innovation in relation to agricultural landscapes was also suggested.

Diversification

It was argued rural planning should be more permissive where there is a need for diversification as part of a pro-active, plan-led process that identifies key types and examples of development that will support diversification.

Clearer policy direction and initiatives aimed at removing barriers to diversifying the rural economy were also suggested. In crofting communities, it was thought there could be scope for diversification including farm shops, tourism accommodation or running rural skills workshops.

There should also be investment in nature-based solutions that should actively support land management sectors to diversify businesses so that they can benefit from enhancing nature and tackling climate change.

Supporting sustainable rural growth

It was argued rural development:

- Should continue to be sustainable, with a focus on how people access services and move about the area.
- Should focus on existing settlements where possible, sustaining town centres, and minimising the need for new infrastructure. A clear presumption that any new rural development will be located where it can help to sustain existing communities most effectively, with development focused on the use of existing buildings was proposed.

It was suggested NPF4 should support economic activity in and around locally designated areas considered suitable for employment-related developments, close to settlements which are accessible by walking/wheeling, cycling and public transport, or can be made so by planning conditions, or where redundant or underused buildings can be used.

Creation of sites for new micro-settlements which engender social and environmental benefits, foster mutuality and sharing (cars, energy production, food production, workspace) were also suggested to create affordable opportunities for people to remain, return and move to rural Scotland.

LPPs were suggested to have a potential role in allowing communities to instigate positive developments which help to sustain rural areas, such as growing local produce and supporting community businesses.

The benefits of giving communities more responsibility for the management of land was also suggested to be a key factor in encouraging people to stay in rural areas. A Public Body, Commission or Taskforce respondent noted their own project trialling an approach to devolving management and providing opportunities for the local authority or community groups to lead on the management of assets.

Supporting sustainable growth in the tourism sector

The importance of providing appropriate infrastructure to support increased tourism was noted and creation of the RTIF was welcomed. The need for infrastructure to support tourism involving motorhomes/campervans while also protecting and enhancing natural assets and providing opportunities for business development in rural areas was suggested.

It was argued that NPF4 should enable LDPs to create potential visitor development areas, which are guided by local need and viable opportunities. In particular, it was proposed there should be flexibility to utilise the landscape to provide increased opportunities for outdoor recreation in areas where there is no high-level protection, particularly in remote areas where there could be spin off benefits to support local communities.

Other suggestions included that there could be:

- Greater opportunities for sport and physical activity.
- Multiuse of windfarm land to connect with outdoor opportunities such as walkways and tourism centres focusing on wildlife and outdoor experiences.
- Opportunities around creative-tourism aspects of replenishment and sustainable utilisation of remote-rural native woodland. The more positive factors an enterprise can embody, the more it should be facilitated and encouraged by planning.

Policy on hutting and other recreational accommodation in rural areas

It was suggested that NPF4 should provide policies on hutting and other holiday accommodation in rural areas. Although the benefits of recreational huts were noted, it was suggested inconsistencies in the application of existing SPP policies have caused approval of hut developments to be very varied across the country. There were calls for:

- Explicit support for appropriate hut developments, with applications considered on their own merits, and irrespective of the contents of LDPs.
- More huts in rural areas, including to help reduce the amount of rural housing being converted into tourist accommodation.

While it was suggested that possible sites for hut developments might be identified within LDPs, it was also noted that this may be challenging given the higher returns likely to be achieved through other forms of leisure accommodation such as chalets.

The importance of assessing potential environmental impacts of any tourist-related developments and leisure accommodation were also highlighted, and that even developments appearing to have relatively insignificant impacts may carry a risk of disturbance to sensitive and protected species.

Balancing tourist accommodation and the need for rural housing

It was noted both that demand for tourist accommodation is not seen as a problem in all areas and that, in some places, second and holiday homes may also create housing shortages. It was suggested that:

- Area-specific problems caused by the short-term letting sector could be addressed through LDPs with strong support from NPF4.
- Clarity on use of occupancy restrictions would be welcome, as these could benefit rural populations having to compete for accommodation.
- Social housing provision needs to be considered where tourism makes house prices/rent levels unaffordable to the local population.

Role of housing

Broader issues relating to housing and to affordable housing in particular are covered elsewhere under the relevant themes. Points included below are more specific to rural or depopulated areas.

As a general point it was suggested national policy should support local authorities to have more prescriptive policies on the type of housing provided to ensure it meets what the local population needs and supports the rural economy. It was also argued that most local authorities have strict policies controlling or preventing rural development and that by making it easier and quicker to obtain planning permission for rural housing plots, NPF4 can help to bring more land to the market.

Shortages of suitable and affordable homes in rural communities were noted and a Local Authority respondent suggested that relaxation of housing in the countryside policy at LDP level would probably be the most effective way to increase housing numbers in rural areas. However, they also observed that, since some communities do not want additional growth, LPPs could identify where more housing would be welcome, with an LDP policy context that allows for this.

Where an area is depopulated to the extent that a community body is not in a position to prepare a LDP, it was suggested resources should be made available to the LPA to prepare a plan to be taken forward as part of the LDP.

It was suggested the process of identification of land for new homes can also be successfully initiated by a local community body, and housing delivered by collaboration between communities, landowners, local authorities, statutory agencies, funders and local housing providers.

A demand for housing outside settlements was suggested to be changing the character of some rural locations and it was argued NPF4 should address this issue in terms of landscape implications, habitat fragmentation and sustainable development. Strong discouragement of housing development in countryside areas was suggested and it was noted that dispersed development will be car dependent.

Tourism

Proposed key objective of NPF4: To support the inclusive economic growth of the tourism industry in a way that benefits and strengthens the resilience of local communities, including those in rural and coastal areas.

Respondents stressed that the tourist economy in Scotland is an important and expanding sector that can benefit both urban and rural economies.

Eco-tourism was referred to as a growth area, with a rewilding centre in the west of Scotland given as an example of eco-tourism activity. The cruise industry was also highlighted as being an important element of the tourist economy, and one that is expected to grow. It was reported that this will require investment in infrastructure, including port towns development and deep water alongside quays.

There was also a recognition of the need for tourism to be managed, with concerns expressed about the sustainability of unlimited growth in the most popular areas. An increase in tourism was noted to put pressure on other aspects of the system, for example through increasing carbon emissions from travel and in the form of conservation challenges. The RTIF was mentioned as a positive development, helping alleviate pressures on local communities in rural areas, and National Development status was proposed for infrastructure to support the tourism industry in the form of investment in transport, interpretation, digital communications and waste management networks to ensure tourists enjoy a high quality of experience.

It was suggested that, in rural areas, planning should support housing development to provide for the increased population required to deliver the services linked to tourism activities. However, the housing challenges for local people because of the prevalence of second and holiday homes were also noted.

It was reported that, while there is strong policy support for the tourism sector in national guidance documents this is not followed through in statutory development plans, with LDPs being variable.

Comments that specifically addressed the role of NPF4 sometimes reflected issues covered at other themes, and included that:

- The significant economic benefits from tourism for both rural and urban areas should be acknowledged and the infrastructure to support tourism, domestic and international, should be prioritised.
- The policy framework should protect the most important environmental assets from development, so that the character of natural and historic places is promoted and conserved for current and future generations. A national map of the most important tourist assets would help ensure their protection from other developments, at a national and local level.
- There could be a specific 'tourism strategy' which would define, identify and develop tourist assets, for example by creating 'destination clusters', thereby encouraging connectivity across tourist areas and managing/dispersing tourists away from concentrations of 'hotspots', such as Edinburgh.

- NPF4 should include a presumption in favour of appropriate tourist development that creates local employment and increases or sustains the rural population. LDPs could be required to identify key tourism assets in their area with policies which protect them and presume against the change of use.
- Planning policies should encourage collaboration between stakeholders to support tourism which is responsible and sustainable.
- NPF4 should include the infrastructure to support communities, for example in terms of visitor accommodation and transport, including to help visitors make their journeys in the most environmentally responsible way.
- Policies should include advice on managing the impact of short-term accommodation lets on tourism, local communities and the housing market.
- The development of green networks should be supported as this will increase access to the countryside, support biodiversity and contribute to carbon reduction. A master planning approach, alongside LPPs would help link tourism to active travel and green networks. Investment in paths and greenspace was seen as benefiting the wider public, including people living in areas of deprivation.
- The specific contribution of nature-based tourism should be recognised through policies that reflect the benefits of nature-based tourism in addressing threats to the climate and natural world.
- Policies should take account of static caravan sites, including the requirements of new sites and the development and improvement of existing ones.
- Coastal 'rollback' should be addressed, including policies which allow landowners/operators to respond to coastal change. This will bring NPF4 into line with planning policy in other parts of the UK.

A small number of National Development proposals either focused on the development of a tourism-related facility or included tourism-related elements within their proposal. They included the creation of a visitor centre, a suggestion for developing a coastal tourism and recreation destination as part of a mixed-use masterplan approach.

There was also a proposal for continued support for the NPF3 National Development of Dundee Waterfront, with the further development of tourism and recreational opportunities part of the future plans.

Town centres

Proposed key objective of NPF4: To ensure that planning policies recognise and address the challenges facing town centres so that they are better able to adapt and be vibrant, creative, enterprising and accessible places to live, work and visit.

There was support for the proposed objective, with a number of respondents commenting on the significant challenges town and city centres face, particularly in relation to changes to the retail sector and the growth of out of town and online retail. The likelihood of the COVID-19 crisis accelerating the pace of change was highlighted and there was an associated call for a review of the Town Centre Partnership's funding strategy by or in association with the Scottish National Investment Bank and for a revised Town Centre Action Plan.

It was also suggested that planning alone cannot address the challenges, and that a more holistic and collaborative approach between government, local authorities, agencies, stakeholders and partners will be required if city and town centre spaces are to stay or become more attractive places for both businesses and people. It was noted, however, that it would be helpful if an overall policy approach was set out at the national level and that guidance would be helpful in supporting a level of consistency. In particular, it was suggested that greater clarity and guidance on town centre health checks is required.

Many of those commenting went on to highlight the importance of taking a town centre first approach, including because of its focus on uses that attract significant numbers of people into town or city centres, and that the focus needs to include attracting people of different age groups.

It was suggested that NPF4 needs to continue to emphasise the town centre first principle, and that encouraging and enabling of a range of different uses will be key. It was suggested that town centres need to evolve away from their traditional retail role into hubs where the full range of social, health, cultural and leisure activities are concentrated. The type of activities highlighted included retail and commercial leisure, offices, community and cultural facilities, increasing residential use and creating better public spaces for social interaction and activity. It was reported that arts events and heritage schemes can promote local economic activity, as can relocating educational facilities into town centres.

One local authority respondent reported that their proposed LDP for 2020 sets out a revised policy position with regards to the primacy of retail in their city centre and that it embraces the trends away from traditional retailing and promotes uses which encourage vitality, viability and vibrancy of place. Other comments about creating well-functioning town and city centres included that:

- The Agent of Change principle should be embedded in NPF4, with a focus on protecting existing uses but also ensuring appropriate amenity of new uses. It was suggested that the need for change in use of a wide range of property types will accelerate, and consideration will need to be given to the adaptability of existing and proposed floorspace to accommodate new uses.

The need for a robust framework to promote the re-use and repurposing of vacant units was argued.

- Simplified Planning Zones and Areas were suggested as a possible option, moving to Masterplan Consent areas.
- Creating Low Emission Zones, with the development of Park and Ride systems, and reduced dependency on car travel through improved public transport should be considered.
- In alignment with prioritisation of green infrastructure delivery, NPF4 should proactively promote the enhancement of town centres through creating new green infrastructure.
- Housing may become more and more important to keeping town centres vibrant.
- There should be continuing protection for listed buildings and conservation areas and a focus on property condition and improving properties, using mechanisms like the Conservation Area Regeneration Scheme.
- Investment should be focused on improving the areas around Scotland's main stations and associated thoroughfares which see (or should be seeing) the highest footfall in Scotland.
- Business rates should be aligned to underpin planning policy for example as a means to support the revitalisation of the high street, deliver more city centre housing, reuse of gaps sites and discourage 'edge' development.

Other comments focused on high streets and high street shops and business being prioritised relative to out of town, retail park style developments. It was suggested that out of town retail developments should only be acceptable in exceptional circumstances, including because rejuvenating and transforming existing areas makes better use of embodied energy, and existing infrastructure and services than does developing greenfield sites.

A connection was also made to maximising the potential of vacant properties and inactive land and it was suggested that there needs to be a greater focus on overcoming constraints on brownfield vacant and derelict sites, with additional funding to bring these forward and support the role of planning as an enabler. These issues are explored further under the *Vacant and derelict land* theme.

There were calls for the different role and circumstances of town centres in rural and island areas to be recognised. However, while it was reported that some may be prospering and continuing to play a vital role, others are suffering from economic and social decline. It was suggested that rural towns could play a key role, but that significant investment will be needed. There was a call for a major programme of rural town renovations, converting them into thriving service hubs for the green economy and into places that provide safe and healthy residential housing for the local community.

Finally, in addition to support for the town centre first principle, there was a call for continued support for the hierarchy of centres approach, including through national policy being flexible enough to accommodate different networks and hierarchies across Scotland.

Place

This part of the report covers Early Engagement Policies under the 'Place' heading and includes sections on:

Air quality

Climate change

Coastal planning

Flooding

Green belts

Historic environment

Infrastructure

Land assembly and compulsory purchase

Natural environment

Peatland

Placemaking

Sustainability

Transport

Vacant and derelict land

Air quality

Proposed key objective of NPF4: To ensure that the planning system helps tackle poor air quality and promote good air quality through the promotion of sustainable placemaking and transport links and ensuring that new developments are guided towards appropriate locations

Comments in relation to air quality were often brief and focused on the importance of good air quality and/or improving air quality from a public health perspective. They included that vulnerable and disadvantaged people are disproportionately affected by the impacts of poor air quality.

The improvement in air quality during the COVID-19 crisis was noted, and it was reported that levels of nitrogen dioxide and PM_{2.5}²¹ emissions have seen dramatic falls. The connection was made to reductions in private car use in particular, and it was reported that there are currently 38 Air Quality Management Areas throughout Scotland, with the majority of them declared as a consequence of road traffic pollution.

Going forward it was suggested that consideration should be given to improving public transport and increasing opportunities to work closer to home. The role that land use planning can play in improving local air quality was noted, including as the pattern of land use determines the need for travel, which in turn is a major influence on transport-related emissions. It was also reported that green infrastructure in and around streets and buildings has a major part to play in reducing urban temperatures and reducing demand for air conditioning, and also has the potential to reduce air pollution including particulates.

It was suggested that air quality should be given greater emphasis in the planning process, with specific NPF4-related comments or suggestions including that greater emphasis should be placed on planning authorities undertaking the necessary action to improve air quality, and that this should be supported by effective resourcing. Other suggestions included that:

- The Good Design Principles set out in the Environmental Protection UK and Institute of Air Quality document Land-Use Planning and Development Control: Planning for Air Quality²² should be employed during the planning process.
- NPF4 Impact Assessments should be thoroughly tested in terms of managing harmful air quality-related impacts but also emphasising opportunities to manage health impact.
- There should be a requirement to prepare low emissions strategies.

²¹ Fine particulate matter (PM_{2.5}) are tiny particles in the air that reduce visibility and cause the air to appear hazy when levels are elevated.

²² Available at <http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

- There should be full integration of the inputs of the planning, transport, housing, education and environment services to ensure that environmental considerations, including those related to air quality, are considered at the earliest stages of the strategic planning processes.
- Careful consideration should be given to the location of developments where particularly sensitive members of the population are likely to be present, such as in the case of schools.
- Although air quality is already a material consideration when determining planning applications, policy should be more focused on ensuring all development makes a contribution towards improving air quality. Incentives as well as restrictive measures will be needed to make this happen.
- Additional measures to offset emissions should be encouraged at an early stage in the design process. It is important that obligations to include offsetting are proportional to the nature and scale of development proposed and the level of concern about air quality; such offsetting can be based on a quantification of the emissions associated with the development.
- More air quality monitoring would help characterise where poor air quality is predicted to become an issue in the future, perhaps due to development being consented now.

It was also noted that there is an ongoing review of the Cleaner Air for Scotland Strategy. It was suggested that NPF4 should provide support for the implementation of the new Cleaner Air Strategy which must be enshrined within the new SPP.

Other themes raised included the need to develop sustainable and active travel options, reduce energy use, manage waste and the circular economy and improve building standards. All these issues are explored further under the relevant themes.

Climate change

Proposed key objective of NPF4: to ensure planning policy results in spatial and land use change that facilitates Scotland’s ambition to have net-zero emissions by 2045 and other statutory emissions reduction targets whilst supporting communities and businesses in making the changes needed to meet the targets.

Many respondents addressed the challenges presented by climate change somewhere within their responses. These comments often related to how other aspects of the planning system – including in relation to sustainable travel, the circular economy, protecting and enhancing biodiversity, taking a nature-led approach, and renewable energy generation and use – can help Scotland meet its climate change targets. These issues are all covered in greater detail under the relevant themes. The focus of the analysis presented here is on other issues raised.

A number of respondents addressed the urgency of tackling climate change and it was noted that the Scottish Government has declared a climate emergency. There was an associated suggestion that NPF4 offers a real opportunity to place the planning system at the heart of the climate change agenda, and that NPF4 is crucial in ensuring that all decisions from now on, made at any level in government, have the key consideration of getting to net-zero by 2045.

As discussed under the *Sustainability* theme, it was suggested that climate change and sustainability objectives must be placed at the centre of NPF4 with all other policy topics a secondary and subservient tier to the principle of addressing the climate emergency. Another perspective was that achieving climate outcomes and wellbeing should take precedence in decision making. There was a call for all policies and national developments to align with and contribute toward addressing the climate and nature emergency.

There was a call for NPF4 to be fully aligned with Scottish Government’s Climate Change Plan and with the Climate Change (Scotland) Act 2009, including by supporting the delivery of local climate change adaptation frameworks. It was also suggested that a more overarching and joined up approach, that better reflects current understanding than SPP now does, will give planning authorities a better basis to include achievable and realistic policies in their LDPs.

It was also argued that localised climate change frameworks that enable place-based decision making will be required. A specific suggestion was that NPF4 should set local or regional carbon targets and require them to be incorporated into LDPs.

The connection was also made to a range of other strategic planning processes and key documents, including to ensuring that national planning policy and placemaking objectives are aligned. It was proposed that NPF4’s message should be linked with the following:

- NPF outcomes relating to: Community Resilience; Supporting Infrastructure; Inclusive Economic Growth; International Partnerships; Climate Justice for

Vulnerable Groups; Increasing the Resilience of the Natural Environment; and Protecting and Enhancing Scotland's Coasts and Marine Environments.

- The Environment Strategy for Scotland and, where relevant, the Marine Strategy Framework Directive.
- The work of the Scottish Infrastructure Commission, in order to create a spatial framework for carbon emission reduction.
- Regional Adaptation Strategies.
- The Land Use Strategy (covered further below).

Given the nature and scale of the emergency faced, it was also suggested that policy should:

- Encourage all with an interest in addressing the climate emergency to change their practices. Climate change policies must be essential requirements ('must haves') not optional ('should haves').
- Remove the obstacles to developments in Scotland that drive forward decarbonisation wherever possible.
- Allow local authorities to require developments to contribute to net-zero.
- Introduce a requirement for LDPs to demonstrate how they are contributing to Scotland's climate and nature targets with a report on their carbon budgets to include the carbon impacts of consented development.
- Encourage local authorities to make interim amendments to key policies rather than just waiting for replacement plans.

Other comments referred to the importance of land use to tackling climate change, including through the alignment of NPF4 with the Land Use Strategy. One perspective was that there is a clear function for NPF4 to help deliver the Land Use Strategy for Scotland and it would be useful to see the connections laid out in the framework.

It was explained that Scotland has been set a more ambitious climate change target than the rest of the UK because of land. There was a view that the decisions that are made over the next few years about how Scotland's land is used will underpin and determine the effectiveness of Scotland's response to climate change. It was reported that land use currently accounts for around one third of current carbon emissions in Scotland and that it will be important to understand the relationship between the necessary reduction in carbon and other greenhouse gas emissions and issues such as woodland creation, peatland restoration, natural flood management, improving biodiversity and habitat protection.

It was suggested that, if Scotland is to meet its emissions reduction targets, it needs to deploy a more purposeful land use planning approach to encourage more development that supports inclusive growth, wellbeing and the sustainability agenda. It was suggested that NPF4 should promote the integration of relevant plans, and specifically their land use elements, into planning. There was particular reference to the alignment of RSSs with other regional activities (such as City Region Deals, Regional Economic Partnerships and Regional Transport

Partnerships) being critical if low carbon objectives are to be integrated and achieved.

By establishing an overarching spatial strategy for Scotland, it was suggested that NPF4 will play a critical role in guiding land use planning decisions and is therefore uniquely placed to enable Scotland to play a leading role in international efforts to tackle climate change.

Specific recommendations included that NPF4 should identify clusters and activity with the greatest potential to address climate change and that this could relate to a business sector or infrastructure capacity. There was a view that, as NPF4 will provide a national perspective, it needs to show how different clusters of business sectors, population, skills and infrastructure interlink and connect Scotland to provide solutions. There was also reference to creating potential low carbon, sustainability-focused investment hot spots and that if these strategically critical sites are identified in NPF4, Regional Economic Partnerships can then collaborate in relation to sites in their area.

Other comments included that:

- NPF4 should set out a national spatial overview for land use, planning and infrastructure, based on Landscape Character Assessment. This would also be a basis for review at local, regional and national scales to check desired climate change results, such as increased woodland coverage are being achieved.
- Guidance should be provided on the role of the Scottish National Investment Bank in supporting net-zero carbon development and alignment of the proposed Green City Region Deals with the RSSs and LDPs.

Design and energy efficiency of buildings

Many of the comments addressed the critical role of the built environment in the mitigation of, and adaptation to, climate change, including as the sector contributes to 40% of the UK emissions. General comments included that:

- Properties must be low carbon by design. Ambitious targets should be set, including for the embodied carbon and operational energy use for buildings. This could include introducing a change in Building Standards to introduce a zero-carbon standard for all new buildings and extensions to buildings.
- Buildings should be designed to minimise the amount of energy they need to heat and cool them. They should meet the highest insulation standards. Green roofs, green walls and local greenspaces can be used to reduce heating and cooling demands.
- Planning applications for all new buildings must meet EPC Band A rating immediately and have suitable renewable energy mechanisms, such as solar panels or air pumps as standard to meet at least 50-75% of average household energy needs. This obligation should increase to 100% after a set time, for example five years.

- More targeted assessment tools, such as the Building with Nature standards, could be promoted to support green infrastructure and biodiversity policy aims as well as placemaking.
- More homes should be heated by district heat networks. Developers should be required to consider this option and LDPs should have to assess the scope for district heat networks as part of the process for selection of sites.
- All new and refurbished buildings should be tested to ensure they perform as predicted.

There was also a call for NPF4 to require consideration of the carbon impacts of materials used, including their 'embodied' carbon, in developments over which the planning framework has influence. It was reported that the lifetime carbon footprint, or whole life carbon, of a building is made up of its lifetime operational carbon (energy used to heat and power it) plus the embodied carbon of the materials and products used to construct it. Depending on building type, between 30% and 70% of lifetime carbon is in the embodied carbon of a build after construction. It was noted, however, that this position is not static and that as Scotland decarbonises its energy, the levels of operational carbon will continue to decrease, and the proportional importance of embodied carbon will increase.

It was also reported that, as buildings and infrastructure constructed today can be expected to last at least until the time when net-zero is to be achieved by 2045/50, to ensure these materials are available for reuse, buildings and infrastructure will need to be designed and constructed now in ways which facilitate recovery of materials at the end of their first life.

Further comments or suggestions included that:

- For this approach to be effective, it is essential that planning policy, detailed planning guidelines and other drivers, including Building Standards are robust and consistent with NPF4, and that wider Scottish Government policies, particularly on public procurement, are also interlinked.
- It also makes sense to build now with better materials, that can be maintained or repaired and that are built with flexibility and with adaptation in mind to extend their useful lifespan, in line with Making Things Last: a circular economy strategy for Scotland.
- NPF4 needs to send clear messages to the construction sector to ensure that all developments are consistent with delivery of the 2045 net-zero carbon target. To achieve this, it will be necessary to consider and address the carbon emissions that arise from the sourcing, processing, transportation, manufacture, construction and deconstruction of the materials, products and built assets used.
- Grading of material based on its impact on the environment should be considered. Where materials are required for construction and refurbishment of buildings, these must be renewable and non-toxic and put together in a way that allows them to be taken apart easily at end of life.

- NPF4 should make clear that achieving net-zero targets requires increased use of local materials.
- Wider use of quality accreditation or performance standards such as BREEAM, CEEQUAL, Home Quality Mark ONE, WELL and Passivhaus should be considered.

Retrofitting

The value of the reuse of existing buildings over new build was highlighted. It was noted that new development accounts for a very small proportion of building stock, therefore finding ways to retro fit energy efficiency measures for the existing building stock will be essential, including because of the embodied energy they contain and which would be wasted if buildings are demolished.

It was suggested that retrofitting will be required across the majority of the housing stock, and that this will need to apply to both rented and owner-occupied stock, and that all existing homes should be retrofitted to certified Enerfit standard.

Other comments about the nature and scale of the challenge, along with possible solutions, included that:

- It will require very significant resourcing, and the Scottish Government should make resources available. This should include financial support for sustainability measures in the existing homes of less affluent owners.
- Design policies for climate change resilience need to support change in existing areas, including how this can be achieved for conservation areas and listed buildings.
- Permitted development rights need to take account of climate change and guidance and incentives should be provided.
- Flexibility will be required, recognising that bringing all properties up to a 'gold standard' will not be practical, but that the standards and expectations that we have for all properties and premises must nonetheless be improved.
- VAT should not be payable on materials used for energy refurbishment of buildings. The 'new building' VAT exemption should be changed to one that encourages reuse and refurbishment of old housing stock and reserved for certified 'net- or sub-zero' new builds.

New or redevelopment

It was suggested that reducing greenhouse gas emissions over a building's lifetime, and dealing with the climate emergency, needs to be at the top of the hierarchy of factors in the planning permission decision making process. This new priority setting must ensure that new buildings are built to the highest energy and insulation specifications, are maximally energy self-sufficient, and that existing stock is upgraded accordingly.

There was a connected view that at present there is a 'presumption for development' but that this must be changed to one against development unless certain 'sustainable' standards are met. Other comments in relation to new

development, including new housing development, included that current policy only allows local authorities to 'encourage' developers to contribute to net-zero, not to 'require' them to do so, and that any changes required will need to be applied across both planning and Building Standards legislation.

In relation to construction, a concern was raised that the construction phase is having a much greater impact on the environment than is generally presented at the planning stage. An Other Representative Body respondent reported that incidences of legal non-compliance and mitigation identified to limit the impact of development are poorly understood, and implemented, during construction. They went on to explain that an Environmental Clerk of Works is sometimes required by planning consents to help support a development, but that the current planning regime limits their effectiveness. They suggested that NPF4 provides an opportunity to make the role more effective, to positively influence and incentivise the construction industry to improve environmental performance and to help protect the special character of our natural heritage and environment.

Another perspective was that the practice of the development industry is already changing as a result of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and forthcoming changes to the Building Standards Regulations. Again, it was suggested that these changes will need to be embedded within planning at the national level, and there was a call for the development of a framework for the transition to sustainable methods of construction.

There were calls for all new homes to be certified to Passivhaus standard and for the benefits of passive housing, and other buildings using modular/offsite methodologies, to be promoted to both the market and supply chain, including the general public, house buyers, general building owners/users, architects and surveyors, and builders/self-builders.

It was also suggested that NPF4 should facilitate strategic consideration of how best to evolve and support the modular construction supply chain and market for Scotland and its regions, including optimising the use of Scotland's better quality regionally grown timber for construction.

In terms of other requirements that respondents thought should be covered by NPF4, and where necessary reflected in revisions to Building Standards, included:

- Requiring new buildings to achieve a high level of energy efficiency (carbon neutral where possible) and to be delivered in the most sustainable way possible with these objectives to be achieved through changes to Building Standards Regulations.
- Setting out appropriate emissions standards for new development, how emissions will be measured, for example using a carbon calculator tool such as SPACE and, where necessary, what measures or schemes are available to developers to off-set emissions. To enable an assessment to be carried out efficiently, there should be a clear requirement for development proposals to be supported by the information needed to measure emissions.
- Guidance on the requirements expected from new development must recognise that carbon reduction technology is rapidly changing, and local

authorities should not adopt a prescriptive approach that may impact the viability and delivery of schemes or prevent alternative solutions to reducing energy consumption and carbon emissions.

- Encouraging the use of low carbon technologies and the use of electric vehicles. Local authorities should work with Scottish Government's low carbon team to ensure that these types of applications can be appropriately assessed. Developers should be required to future proof new residential developments for low carbon technologies and electric vehicle charging.
- Requiring a 10% biodiversity net gain on development sites over the course of their delivery. This could be assessed on a percentage of the site area or the level of the quality of the improvements.
- Considering the potential of smaller properties, with a variation of Passivhaus ideas allowing net-zero or better with little effort. It was reported that smaller does not have to mean 'cheap and cheerful' but can allow for high quality and the use of sustainable materials which consider a long lifespan for the dwelling.
- Requiring the better integration of climate mitigation and adaptation measures in redevelopments and new designs, for example with open space, de-culverting water courses, solar shading, permeable surfacing, food growing, larger gutters and grey water capture.
- Removing the ability for developers to construct 'new dwellings' under an historic Building Standard specification by banking building warrants prior to construction.

Finally, it was suggested that more pressure at the national level needs to be put on developers, particularly typical national housebuilders, to develop low carbon homes which are of high quality and a more innovative design.

Carbon capture and storage

A range of issues were raised in relation to carbon capture, sequestration or offsetting. They included that one approach could be offering carbon sequestration opportunities, such as through woodland creation and management, peatland restoration and wetland creation and management. It was suggested that provision could be made for this off-site, through contributions, in a similar way as is the case for Significant Alternative Natural Green Space and that it could be linked to other biodiversity measures, to induce multiple benefits.

NPF3's recognition of forests and woodland as economic as well as environmental assets was highlighted, and it was suggested that forests and woodlands can be part of a just transition to a net-zero economy by providing green jobs, and also be part of the transition to making Scotland's land into a carbon sink and more biodiverse. It was also reported that the right trees in the right place for the right reasons can prevent flooding, improve air quality, provide habitats for improved biodiversity - all while absorbing carbon. However, there was also a note of caution that an approach which results in monoculture of forestry does not offer the benefits of biodiversity.

As part of this, local authorities should commit to a minimum target for tree canopy cover in new developments of 30%. A developer levy could stipulate requirements to reach this target and trees can be planted in advance to provide mature natural infrastructure for when the development is finalised.

Tree planting on vacant and derelict land has also been recognised as a way to use land to absorb emissions. Some of this type of land is close to where communities live and therefore it can provide a range of benefits for a range of NPF outcomes.

Other suggestions in relation to capturing carbon or offsetting included that:

- A framework for accredited carbon offsetting could support an area to become net carbon zero.
- Aquaculture should also be considered for carbon capture given that Scotland is a maritime nation with vast amounts of inland water.

Another theme was in relation to CCS, which was considered by the majority of respondents who commented on the issue as essential to Scotland meeting its net-zero greenhouse gas emissions targets. A number of the National Development-related comments or proposals called for the continuation of the support for CCS. One of the NPF3 National Developments is a Carbon Capture and Storage Network and Thermal Generation.

It was suggested that there is no credible scenario for meeting net-zero targets that does not include CCS and it was reported that the Committee on Climate Change stated that CCS is a necessity, not an option, if the UK wants to achieve net-zero by 2050²³. There was also a view that Scotland is uniquely placed to take advantage of the opportunities CCS presents, including through its contribution to sustainable economic growth.

It was seen as important that NPF4 takes full cognisance of the potential contribution of CCS to meeting the target of net-zero emissions by 2045, and also of the opportunity for Scotland to take a world-leading role in the application of this technology, bringing together the relevant technical, economic and commercial expertise that has been developed in Scotland over half a century. It was also suggested that NPF4 should support the further development of CCS technologies.

It was reported that at present SPP only requires CCS in the context of energy projects, and there was an associated call for the requirement for CO₂ capture, or CO₂ capture readiness, to be applied to all new developments that are expected to have CO₂ emissions above a certain threshold, unless comparable emissions removal or avoidance can be demonstrated by other means. It was suggested that this should apply to emissions of CO₂ from both fossil and non-fossil sources, to maximise the potential for greenhouse gas removals.

Other CCS-related suggestions or proposals included that:

²³ Available at: <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

- CO₂ transport and storage infrastructure would provide a CO₂ take-away service to industry, enabling plants to capture their CO₂ in the way that best suits their process, then pass it on to the operator of a shared transport and storage infrastructure for safe and permanent storage. The development of a CO₂ transport system should nonetheless be a planning priority.
- There is a particularly significant opportunity for Scotland in relation to the permanent storage of CO₂ in deep, onshore or offshore geological formations. It was reported that this could utilise many of the technologies – and potentially some of the infrastructure - that have been developed over decades by the oil and gas industry, and that Scotland is well placed to provide the technological underpinning and the potential repositories needed for a workable CCS policy.
- Crown Estate Scotland could play a key role in future development of CCS through its role in leasing rights to carbon and gas storage on the seabed out to 200 nautical miles.

It was reported that CCS necessarily involves additional costs for capture as well as storage, and it was suggested that with a global market intent on minimising the cost of energy, there needs to be a level of carbon tax that would make such investments viable. It was suggested that CCS only becomes economically attractive if polluters are required to pay a tax or levy greater than the cost of implementing CCS.

An alternative perspective on CCS from one respondent was that the viability of it being implemented on a large scale is doubtful and that it is still a largely unproven technology, despite receiving years of funding. It was suggested that relying on a technology that might never be viable not only runs the risk of delaying urgent action needed today but diverts funds away from more credible solutions such as building the infrastructure needed for 100% renewable energy across heat, transport and electricity.

Research and innovation

As in relation to CCS, the critical importance of innovation and research was highlighted, and it was suggested that Scotland can make huge economic gains by heavily supporting the innovation process and enabling the roll out of new innovations globally.

However, it was thought that the high level of innovation necessary will only happen if there is a mechanism in place that allows for quick and easy access to funding, from the conceptual stage onwards, for the key players such as researchers, research institutions, inventors and companies.

Regional innovation hubs with low-threshold access for innovators, and the ability to access sufficient funds rapidly, were proposed as the critical step that would allow for the transition from idea to development, trial and implementation to be shortened drastically. It was suggested that this will require a government and/or government/industry funding scheme that aims to put Scottish talent at the forefront of a technological revolution.

Coastal planning

Proposed key objectives of NPF4: To recognise and support the unique challenges facing Scottish coastal areas and communities and promote development that supports their needs

There were calls for future planning policy to continue to assert the importance of Scotland's wild coastlines, and for coastal protection including infrastructure to take account of sea level rise /storm surges. The need for an emphasis on safeguarding and enhancing coastal ecosystems and the natural protection services they provide was also suggested as was support for managed re-alignment projects - replacing artificial 'hard' coastal defences with natural 'soft' coastal defences.

The need to give greater consideration to the threat of climate change and erosion to the coastline was suggested and it was argued:

- Development should mitigate /withstand adverse outcomes.
- There needs to be stronger policies to prevent development close to soft coastlines where there has been a history of erosion and flood risk.

It was also argued that a one-size-fits-all approach to coastal planning policy would be detrimental to sustainable development for smaller islands where, in some cases, all areas may be coastal in character. In these circumstances it was argued to be more appropriate for the protection of coastal landscapes to be considered within the context of the landscape character of islands as a whole.

Complementing existing policies and guidance

A requirement for improved integration between the flood risk management and coastal protection planning activities of SEPA/local authorities and local development planning was suggested, as was the need for flood risk management strategies to provide more guidance.

The importance of integration between terrestrial and marine planning systems was highlighted, with particular reference to:

- The National Marine Plan.
- Regional Marine Plans.
- Sectoral plans for Offshore Wind and Aquaculture.
- Ports and harbours.

The RSS was seen as providing an opportunity to establish a spatial development framework to enable an integrated approach to the LDP, Regional Marine Plan and associated development projects.

Additional policy guidance for the marine land interface was thought necessary, including a view that Circular 1/2015 should be updated to reflect the more diverse ownership and activities now happening in the intertidal, coastal and offshore

environments. Clear policy direction was suggested to be needed to underpin effective devolved marine planning.

It was also noted that the Scottish Crown Estate Act 2019 will provide further opportunities for island communities to derive enhanced benefits from the assets in their area, and continued support for the Crown Estate Asset Management Pilots was proposed.

Managed coastal retreat

Respondents argued that there should be consideration for policies on managed coastal retreat or roll-back – movement of properties, settlements and infrastructure from at-risk areas to inland sites. In some cases, it was argued, the cost per head of population for coastal protection or remedial works will be disproportionately high and that coastal retreat will be the most sustainable approach.

It was suggested NPF4 should provide a policy (and/or spatial) framework for how managed relocation can be addressed via LDPs and that this could include identifying areas where further additional development may be limited due to flooding and/or coastal erosion, and those to which existing development can relocate.

Other issues

Other suggestions with respect to coastal planning included:

- There should be policies enabling a landowner or operator of a site to implement coastal defences, at their own cost and subject to satisfying the appropriate criteria.
- Coastal locations need to be much more alive to recreational and short distance water-based transport.
- Marine conservation areas should be enlarged, or new Coastal Marine Reserves created.

Flooding

Proposed key objective of NPF4: To reduce the vulnerability of existing and future development to flooding.

Please note that issues associated predominantly with coastal flooding are considered under the *Coastal planning* theme.

It was argued that flood risk management should be considered core to the placemaking agenda, combining flood prevention with green infrastructure, public realm and biodiversity and that NPF4 should adopt a precautionary approach to all forms of flood risk.

With respect to SPP it was suggested that there should be:

- A clearer position on land raising as well as other forms of flood risk mitigation to provide certainty for all stakeholders.
- Clarification and amendment of the policy approach for areas behind Flood Protection Schemes as an appropriate standard is not defined in SPP. The Local Authority respondent making this point also provided a separate paper detailing their proposed approach to what they viewed as a key planning issue.
- A requirement for up-to-date climate change allowances to be taken into account in flood risk assessments. The effects of rising sea levels and climate change on water tables and the effect on pluvial and fluvial flood risk were also highlighted.

Blue/green infrastructure first

An infrastructure-first approach to blue/green infrastructure was proposed with suggestions including that:

- Active promotion of blue/green infrastructure should be an integral component in NPF4.
- Blue/green infrastructure should be fully integrated into built up areas to increase resilience to flood risk and deliver a wide range of other benefits for people and the environment.
- Land for blue/green infrastructure (including the floodplain where relevant), should be considered to be a site pre-requisite because of the significant benefits it will deliver for flood risk management.

The benefits of natural flood management were often referenced, including the need to manage rainwater close to where it falls. It was suggested flood management needs to be considered in the management of all land with both farming and forestry/tree planting playing roles in flood mitigation, and that NPF4 and SPP should promote cross-sector working bodies with power to make the connections between the policies of each sector. Adoption of the Scottish Nature Network as a National Development was suggested to assist in providing the

collaboration between planning and other land use sectors needed to deliver natural flood management measures.

The importance of habitat creation to store or slow water flow in upstream catchments was noted and a strategic catchment-level approach to flood management was said to be essential. The possibility of using compulsory purchase with respect to critical land in catchment areas was raised.

It was also noted that creation of natural habitats to provide ecosystem services can offer significant cost savings when compared to using hard engineering flood defence solutions, whilst also providing significant opportunity to improve biodiversity.

The value of SuDs in managing flood risk was highlighted and a requirement for their better integration with landscape design was suggested. There were references to the potential contributions made by: rain gardens; green roofs; wet parkland; and porous roads and pavements. Urban Flood-sensitive Zones where SuDS and other blue/green infrastructure is mandatory were proposed.

It was noted that management of surface water is a complex issue with a number of agencies having distinct and established statutory responsibilities enshrined in legislation, with no single organisation that oversees how surface water is managed in its entirety. There was a suggestion that the lack of a cohesive approach may lead to missed opportunities to implement effective SuDS and blue/green infrastructure early in the development process, and a need for better integration of policies and legislation relating to water, flood risk, and climate change and adaptation was argued.

Ongoing maintenance of SuDS was also suggested to be problematic, and it was suggested NPF4 should provide clear guidance on how planning permissions can ensure their future maintenance, particularly in relation to which body has responsibility for maintenance.

The need for better joint working, and for all parties with drainage responsibilities to access the necessary finance was suggested. Making a single public body responsible for SuDS was also suggested as a way of avoiding issues around design, management and maintenance.

Role of LDPs

The need for LDPs or RSSs to reflect Regional Flood Risk Management Plans and Strategies was highlighted. It was also suggested LDPs should:

- Designate surface water corridors/routes at strategic or catchment level to ensure flows during flood events are safely routed away from buildings.
- Identify, with the support of Scottish Water, opportunities for retrofitting sustainable drainage solutions that remove surface water from the combined system and mitigate the impacts of existing or future flood risk.
- Take a whole-system approach to the regeneration and revitalisation of urban centres including an integrated, strategic approach to current and future flood risk.

It was also proposed that, to ensure consistency and fairness across local authority areas, consideration should be given to identifying a climate change freeboard allowance for each Local Plan District, as identified in the Flood Management (Scotland) Act 2009.

There were calls for NPF4 to provide more direction on how local authorities should plan for the increase in flood risk from climate change. While policy and guidance from SEPA on current risks were thought to be clear, it was argued that further guidance should be provided on taking climate change into account.

Specific suggestions with respect to increased flood risk included:

- Setting climate change allowances for flood risk assessments to ensure a standardised approach to consideration of flood risk and that increased flood risk from climate change is taken into account in allocation of sites.
- The possibility of creating buffer zones around current flood plains.

It was also noted that local authorities may be faced with competing priorities with respect to mitigating flood risk and redevelopment of vacant and brownfield sites in towns and cities. In these circumstances, innovative flood management measures were argued to be more helpful than a blanket ban on development.

Proposals for new development

With respect to new buildings and infrastructure it was suggested that:

- The role of Strategic Flood Risk Assessment in development planning should be greatly strengthened. This was seen as vital to ensuring SEPA's engagement in the planning process is front-loaded, and that development plans are deliverable.
- New developments should be net-zero in terms of water in/out.
- Rainwater should be managed on-site in all new development such that run-off rates from new development should not exceed those of greenfield sites, and incorporation of green infrastructure to help achieve this should be prioritised over installation of grey infrastructure.
- Development plans should be required to allocate land for strategic blue/green infrastructures that manage and convey surface water on the surface and support multiple developments.
- Surface water drainage considerations should be required to be made at the earliest possible stage in the development planning process, when land to be set aside for new development is being identified. The aim should be to deliver infrastructure in a co-ordinated manner, ahead of development, rather than a reactive, piece-meal approach.
- Developers should be required to include a formal allowance for an increase in flood risk as a result of climate change as part of a planning application. It was also suggested that advice from SEPA on whether or not to permit development within the functional floodplain should require developers to make an allowance for increased flood risk in light of anticipated climate change.

- Building standards should be applied to support the installation of sustainable surface water management systems such as green roofs, water butts, rain gardens and porous paving at property level, whilst minimising impermeable surfaces and the volume of surface water entering piped systems. Installation of impermeable paving should be brought fully under planning control with powers to refuse permission where this could contribute to flood risk.

Further guidance on the provision of permeable surfaces in new development was requested, particularly on the extent of the provision that can be required.

In general, it was suggested the planning system should be much stronger in its requirement for the delivery of sustainable blue/green interventions for surface water management – both for new build/regeneration, as well as enabling interventions to reduce existing flood risk.

Protecting existing infrastructure

It was observed that flood alleviation for existing development and existing infrastructure also needs to be improved, with specific suggestions including the need to enforce responsibilities for dredging and drain maintenance in planning regulations, or to require planning permission before paving over gardens.

Railways

With respect to existing infrastructure it was argued that attention should be paid to protecting railways from flooding. It was suggested that:

- Network Rail and other critical infrastructure providers should become key agencies.
- Compulsory purchase powers should be available when required to deal with flooding on National Rail land.
- Expedited consents processes may be needed to facilitate emergency repairs.

Ports

It was suggested local authorities should enter into discussion with port operators and Port Authorities to ensure that flood protection requirements can be addressed in a manner which provides the necessary protection whilst ensuring the interest of port operations are fully addressed.

National Development proposals

A small number of the National Development proposals focused on flood protection, including a proposal to provide protection to properties, businesses, port and industrial facilities. It was suggested that the Metropolitan Glasgow Strategic Drainage Partnership (an NPF3 National Development) should continue to have National Development status under NPF4.

Resilience

The importance of building resilience into new developments was noted, and adaptation approaches were suggested as a means of better assessing the robustness and flexibility of designs in different future scenarios. The role of

Building Standards in setting criteria for flood resilience of new build was also observed.

Specific suggestions included:

- Home reports should include a mandatory section on whether the property is at risk of being flooded and whether any measures have been undertaken by the vendor to install property flood resilience.
- Use of more resilient and sustainable materials should be encouraged. The BRE flood house project²⁴ was suggested as a source of information on measures that could be implemented to improve the resilience and sustainability of future homes.
- Residential properties could be designed with the ground floor level for storage or garage purposes.

There was also a call for increased focus on the social impacts of flood risk, making the social vulnerability of those potentially impacted by flood risk a factor in planning decisions. It was argued this would enable consideration of the ability of people to prepare for, withstand, and recover from flood events. The important role of community resilience groups was also highlighted, and it was suggested this should be recognised in NPF4, with engagement between such groups and local authorities placed on a more formal basis, in line with the Community Empowerment (Scotland) Act 2015.

Safeguarding land for current or future flood management

There was agreement that land required for flood management now and in the future should be safeguarded and a suggestion that protection of flood plains should be a National Priority.

Specific suggestions included:

- Development on flood plains should be avoided/discouraged or prevented.
- Redevelopment of brownfield/vacant/derelict sites in flood prone areas or within the flood plain should be designed to recover quickly from flooding through the use of resilient and sustainable materials.
- Local authorities could be encouraged to consider, where appropriate, land included on the Vacant and Derelict Land Registry as spaces that can be used to manage surface water while creating enjoyable and usable amenity space for the local community during dry weather periods.
- The correct type of development should be supported in flood plains.

SEPA advice

It was argued that advice from SEPA to planning authorities on development within functional floodplains, action taken, and the respective roles of local authority officers and elected members should be more readily accessible by the general public. There were reported to be concerns among community groups as to

²⁴ Available at: <https://www.bre.co.uk/floodhouse>

whether SEPA's guidance is always accepted by local authorities or adhered to by developers and there was suggested to be a lack of transparency in the process by which planning authorities proceed when SEPA has an outstanding objection to a proposed development.

Green belts

Proposed key objective of NPF4: To direct planned growth to the most appropriate, sustainable locations whilst protecting and enhancing the character, landscape setting and identity of settlements and providing access to countryside recreation.

Many of those commenting on green belts commented on either their value or that they should continue to be protected. Points raised included that green belts are a nationally important resource which help to direct growth into appropriate locations within settlements. The benefits they bring in terms of climate change mitigation, supporting biodiversity and contributing to the quality of life and wellbeing of society were amongst those highlighted.

There was sometimes a concern that the integrity of green belts is under threat, primarily from housing development, and there were references to current proposals to develop within green belts, including those of Aberdeen, Edinburgh, Glasgow, Perth, St Andrews and Stirling. On a similar theme, it was suggested that NPF4 must play a significant role in reducing the constant conflict that exists among government, councils, communities and developers when it comes to planning.

Those raising such concerns tended to call for green belt policy to be strengthened, sometimes also making the connection made with prioritising the use of brownfield sites. In terms of their role and potential going forward, comments included that green belts could:

- Be made more sustainable and useful to society, for example through encouraging more local food growing, with the development of more allotments and urban crofting sites.
- Make an important contribution to the development of a Nature Network.
- Not necessarily encircle settlements but potentially take other forms such as green fingers or wedges, with the role of each individually identified piece of green belt, or finger or wedge set out in development plans.

In terms of ways in which policy could be strengthened or improved, suggestions included by:

- Encouraging local authorities to extend existing green belts and designate new ones.
- Providing a clearer definition and degree of differentiation between the green belt and the wider rural area.
- Requiring local planning authorities to use RSSs, LDPs and a Nature Network to manage green belts more effectively for the long-term benefit of local communities and the climate.
- Preventing the granting of planning permission for building developments on green belt land while undeveloped brownfield land remains in their area, with

unmet housing targets no longer considered a valid reason for development on green belt land.

- Introducing mechanisms to prevent speculative planning applications for large-scale residential developments on designated green belt land.

It was also suggested that green belt designation and policy can be a key issue for local communities and that a review – outwith the NPF4 consultation - of how it is designated and what development may be acceptable is needed. Also with reference to communities, it was proposed that the role of community councils in relation to planning appeals related only to green belts should be formalised.

While some respondents favoured strengthening green belt protections, an alternative perspective was that green belt policy needs to be reviewed and reconsidered, with NPF4 providing an opportunity to redefine the purpose of green belts and to articulate clearly the difference between them and the wider supply of greenfield land. It was also suggested that the green belt should not continue to be utilised as a *de facto* landscape designation and that, if a particular place or area is required to be protected for specific reasons, the use of a specific landscape designation is more appropriate. There were also references to considering the green belt's role in terms of supporting sustainable economic growth, development around some settlements and climate change mitigation, including in relation to sustainable energy generation. Further comments included that:

- Green belt designation should be reviewed each time a relevant LDP is prepared or reviewed.
- Land that does not meet green belt objectives should be released for other uses, including specifically for the delivery of homes.
- Where a local authority is constrained by the green belt and is not meeting their housing land need and demand targets, they should be required to release sufficient land from the green belt in the form of Safeguarded Land.
- Clearer policy for brownfield sites within the green belt would be helpful.

A number of local authority respondents were amongst those commenting on how prescriptive NPF4 should be in identifying the issues for planning authorities to consider when designating green belts and determining planning applications. Views were mixed, with some considering the existing guidance provided by SPP is sufficient. However, it was also suggested that more prescriptive advice could be provided in NPF4 in terms of assisting with the designation of green belts. It was seen as particularly important that NPF is specific and clear about the uses which will and will not be acceptable within green belt areas. For example, it was noted that if proposals relating to hutting are promoted, there would be a need for identification of the types of areas that would be suitable within the green belt.

In relation to whether NPF4/RSSs should have a role in identifying green belts, one view was that the role of identifying and defining green belts should be retained by local authorities, who hold the required local area knowledge to appropriately determine the extents of these areas. However, it was also suggested that while the identification of boundaries should be left to LDPs, where there are cross-boundary issues the RSS may be the more appropriate vehicle for identifying green belt boundaries.

Historic environment

Key objective of NPF4: To support the understanding, protection and importance of the historic environment so that the cultural, social, environmental and economic value of our heritage continues to contribute to Scotland's wellbeing.

A small number of highly detailed responses addressed the care and protection of the historic environment. All responses are available to the relevant Scottish Government policy team and all organisational responses are amongst those available on the Scottish Government's website. This summary focuses on the key points raised across the range of submissions.

The historic environment's contribution to Scotland's sense of national identity and wellbeing was highlighted, including as acknowledged in Historic Environment Scotland's *Our Place in Time*²⁵ strategy document. It was also noted that the historic environment forms a core part of Scotland's tourism offer. Others highlighted that the historic environment contributes to a number of wider policy priorities, including by:

- Making a positive contribution to mitigating the climate change emergency through good management of resources.
- Providing economic stimulus locally through the skills and knowledge required for good stewardship.
- The creation of places which are vibrant and empowering to work in, live in, and visit.

Given these connections, there were calls for historic environment policy to be mainstreamed within planning policy. A number of respondents noted their general support for current policy approaches and there was also a suggestion that NPF4 policy on managing the historic environment should be aligned with Historic Environment Scotland's *Historic Environment Policy for Scotland*²⁶, including by adopting the language and terminology used.

It was also suggested that NPF4 should enable planning authorities to access the Historic Environment Records, along with the expertise to understand and utilise the information at a local level.

In line with the suggestions above around recognising the contribution the historic environment plays, it was also suggested that the following should be considered when developing NPF4:

- Integrating the spatial elements of the current approach into NPF4. It was suggested that the relevant elements of the current SPP should be carried over, and strengthened where needed.

²⁵ Available at: <https://www.historicenvironment.scot/about-us/who-we-are/our-place-in-time/>

²⁶ Available at: <https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/>

- PAN 2/2011 should be retained but there is an opportunity to make it more robust and fit-for-purpose. PAN 2/2011 was reported as including important guidance relevant to archaeology, but there was a suggestion that it could be revised, for example to incorporate the idea of 'archaeological value'. In relation to the management of battlefield sites, it was suggested that paragraphs 140,150 and 155 of SPP are appropriate and should be retained.
- In relation to scheduled monuments, some of the terminology can be open to interpretation, for example, 'integrity of setting' and 'exceptional circumstances'. This should be reviewed, to improve clarity and avoid conflicting interpretations.
- Conservation objectives should be developed for historic battlefields and gardens and designed landscapes.
- The preservation of the pre-1919 housing stock, including the stock of tenements, should be addressed as it defines the character of many towns and cities in Scotland.

There was a call for policy to require owners of heritage assets to create stewardship plans with the associated budgets. It was suggested that this would help in identifying where conservation is economically viable and is an issue that should be acknowledged and addressed, for example, if climate change-related retrofitting is required.

Other comments addressed development or adaptation, including in relation to listed buildings, and included that:

- Current wording makes it difficult for a planning application to be fully compliant and that all options should be considered to allow the continued use, or reuse, of a listed building.
- Incentives could be devised to encourage more inventive adaptation of historic buildings, for example to embed carbon.
- Further guidance on enablement, with examples, would be helpful. It was suggested that a new enabling policy should be consistent with the principles and policies contained within the *Historic Environment Policy for Scotland*. Detailed comments and suggestions on improvements on the topic of enablement can be found in the relevant submissions.
- Specific guidance is needed in relation to development on the edge of historic towns - this is not addressed sufficiently at present.

Infrastructure

Proposed key objective of NPF4: to promote the alignment of development and infrastructure at the local, regional and national level by identifying infrastructure capacity, need and what is required to support its delivery.

Respondents often noted or expressed support for the recommendations of the Infrastructure Commission for Scotland²⁷, particularly with respect to:

- Taking an infrastructure first approach.
- Prioritising investment decisions based on their contribution to the delivery of low carbon infrastructure or meeting net-zero targets.
- Making use of existing assets.

There were calls for infrastructure to be planned and delivered at a national level or for a more strategic or joined-up approach to ensure delivery is less fragmented. The need for collaboration between local authorities, developers and infrastructure providers was suggested, with the role of utility providers highlighted as being of particular importance.

It was also suggested that it will be important to align infrastructure investment with other strategies and frameworks including: The Land Use Strategy and Regional Land Use Frameworks; NTS2 and Regional Transport Strategies; and the updated Climate Change Plan.

There were calls for:

- An Action Programme for infrastructure requirements to be developed for each region.
- Creation of a National Infrastructure Agency or another arms-length public agency with powers similar to the Countryside Commission for Scotland.
- Recognition of the link between economic, health and natural infrastructure requirements and the need for planning to work collaboratively with key agencies and partners in health and social care, education, infrastructure provision and transport.

Other suggestions included that NPF4 should:

- Target 'infrastructure-deprived' areas. This was sometimes expressed as 'rural infrastructure first' or with reference to a particular area felt to have missed out on previous infrastructure spending. It was noted that infrastructure will also play a critical role in promoting the inclusive growth agenda, opening up deprived areas to employment and inward investment opportunities.

²⁷The Key Findings report is available at: <https://infrastructurecommission.scot/page/key-findings-report>

- Consider provision in a holistic way – for example not looking only at education provision but how these facilities can deliver other community needs.
- Recognise landscape as a vital component of infrastructure and not just an asset.
- Require the carbon impacts of all new infrastructure to be considered, with full lifecycle carbon emissions taken into account when prioritising investment.
- Shift the emphasis from taking infrastructure to development sites to focusing development on existing infrastructure – for example transport hubs.
- Consider a Compulsory Purchase Order process or an agreed, time-limited process to prevent long or expensive legal delays to infrastructure projects.
- Consider an infrastructure self-certification scheme, whereby developers, in conjunction with service providers, establish the infrastructure requirements for their proposals and the costs of provision. It was suggested this would help ensure that infrastructure requirements and deliverability are fully considered at an early stage and would allow infrastructure costs to be incorporated into the decision-making processes of both developers and planning authorities.

It was also argued that developments that are not financially viable or which cannot deliver the required infrastructure should not be supported and that this principle should be applied from initial site allocation in the LDP through to the approval of planning permission.

Respondents who commented on the Infrastructure Commission's recommendation with respect to making use of existing assets sometimes suggested that a whole-life based approach should be a key consideration in the creation of new infrastructure or that there should be a strong presumption for reuse and repurposing over new build. Consenting repowered onshore wind developments was suggested as an example of making use of existing assets, as was use of the existing canal network as a component of 'smart' water management systems. Protection of existing infrastructure relating to culture and heritage was also proposed.

With respect to future-proofing development plans it was suggested NPF4 and LDPs should take account of emerging technologies and be flexible in how these might be delivered in the future.

Priorities

Respondents also identified numerous specific types of infrastructure they felt should be prioritised. Many of these topics have been addressed under other themes, particularly *Energy - electricity*, *Green infrastructure* and *Transport*, so are noted only briefly here. Types of infrastructure identified included:

- Mains water supply or drainage/sewerage. It was argued mains water infrastructure in rural communities must be improved to ensure everyone has access to a reliable supply of safe, clean and potable water. Delays in delivery of housing on vacant and derelict land were reported to have been caused by delays in provision of drainage and it was argued significant investment in

drainage infrastructure, well beyond that to which viable developments can contribute, is required to help authorities deliver sustainable development.

- Elements of blue/green infrastructure. It was argued planning guidance for green and blue infrastructure should be updated to provide regulation for implementation rather than best practice guidance.
- Large scale renewable energy developments.
- Repowering onshore wind sites.
- Electricity grid infrastructure, with specific references to capacity, and waiting time for connections.
- Electric Vehicle charging infrastructure.
- Onshore infrastructure associated with offshore wind development, hydrogen production, wave and tidal energy systems and CCS.
- Hydrogen infrastructure, including investment in manufacture and storage and for infrastructure to support distribution of hydrogen as a fuel for transport.
- Digital infrastructure.
- Transport, including improvements to road and rail networks. Increased rail freight capacity and further electrification of freight routes. Improved road and rail connections to ports and airports.
- Improved public transport facilities.
- Infrastructure to facilitate active transport.
- Port and harbour infrastructure, including new and extended port and harbour infrastructure required to support the onshore development associated with offshore wind.
- Waste management, including facilities to support development of a circular economy.
- District heating.
- Education or Health facilities.

Ports and Airports

The national importance of Scotland's ports was highlighted, and it was argued NPF4 should support development for employment uses within operational ports, as well as the maintenance and development of sea transport infrastructure, including port infrastructure. A mechanism for improved joint working between planning authorities and Marine Scotland was suggested to be necessary for situations where there are related consenting regimes.

Several port-related projects were suggested as National Developments. Ongoing National Development status was also proposed for Freight Handling Capacity on the Forth and for Aberdeen Harbour, both National Developments under NPF3.

With respect to airports, operators were suggested to require more clarity with respect to the criteria to be met for a presumption in favour of airport development.

There was also support for Strategic Airport Enhancements (a National Development under NPF3) to continue to have National Development status under NPF4.

Developer contributions

Several respondents referenced developer contributions in the context of infrastructure, including that NPF4 needs to provide a framework for developer contributions, confirming where contributions can be sought, and providing guidance on methodology. It was also suggested that requiring developments to pay for the infrastructure needed to deliver them will focus development on brownfield and infill sites where infrastructure already exists. However, it was also argued that the cumulative impact of contributions for developments should be considered alongside development costs and other policy requirements.

Confirmation was sought that that primary healthcare facilities are a legitimate subject for developer contributions.

The complexity of current provisions for section 75 based developer obligations were also noted and a simpler approach was suggested necessary to allow councils to plan infrastructure funding without exposure to significant financial risk. There was a call for NPF4 to support introduction of a local or regional infrastructure levy, but also a request to consider the potential impact on islands where, it was suggested, any infrastructure levy could make new development unviable.

Other funding

General points on infrastructure planning and delivery included the need for adequate resources to be available, or for a joined-up approach to funding, with one suggestion of a ten-year capital investment programme to support NPF4. Concerns were also raised in respect of loss of EU funding post Brexit, coupled with the related risk of rising import costs for the construction sector. It was argued that guidance and good practice advice on the use of prudential borrowing, joint venture arrangements and other collaborative models of delivery might be helpful for planning authorities.

Resource implications for local authorities were also suggested in terms of additional demands on the Planning Service. Requirements for training and support for existing staff or for additional staff were identified.

Land assembly and compulsory purchase

Proposed key objective of NPF4: To promote a proactive, infrastructure first approach to land assembly, including the use of compulsory purchase powers where appropriate, and to underline that doing so can support the delivery of planning/placemaking objectives.

The work of the Scottish Land Commission around improving the operation of the market for land for housing and development was highlighted, including around supporting more effective community engagement in land use decision making. Other themes were reported as work to:

- Investigate the effects of land value and availability on rural housing.
- Understand and assess the consequences of land vacancy and dereliction.

In relation to land value sharing, comments included that public interest-led development is based on the principle that a more proactive involvement by the public sector should enable additional value to be created through the development process that would not otherwise exist. It was suggested that, by creating a framework that would enable landowners and developers to share this additional value, it should be possible to harness their rational self-interest in pursuit of the common good.

However, it was argued that no single legislative or policy mechanism will achieve this but that NPF4 could help achieve a fundamental shift in culture in which relationships between landowners, developers and public planners are based on mutual trust and respect and conducted in the spirit of collaboration and shared purpose. To this end, it was proposed that NPF4 should adopt the principles and language of land value sharing and encourage local authorities to embed this in practice.

With regard to approaches to land allocation, it was reported that the way land currently comes forward for development reflects Scotland's current model of speculative development in which decisions are largely driven by commercial interests. There was a call for a more plan-led approach that delivers on the public interest and creates resilient, thriving and sustainable places. It was suggested that the planning system has to continue to develop its role as an enabler of development, working with landowners, developers and agents to assemble sites and bring them forward for development and attract investment. Specific suggestions included that:

- NPF4 and SPP should strongly empower planning authorities to take a more proactive, plan-led approach to allocating sites for development.
- Allocation of land for development should be evidence-led by early engagement with key agencies, infrastructure providers and communities in advance to the proposed gatecheck stage.
- Closer working with economic development services and other agencies, with available funding is required to deliver land for employment purposes.

- If local authorities had the funding, a more proactive approach to land assembly could be taken along with an infrastructure first approach to have development ready sites. This could include use of compulsory purchase or similar powers. Masterplan consent areas offer potential to explore this further and to create a simpler planning system for developers.

Also in relation to land assembly, it was suggested that the creation of a national spatial framework requires a national strategy and a whole system approach, and it was suggested that there should be an alignment between National Investment Bank priorities and NPF4. Other suggestions included that:

- The potential circumstances in which a proactive approach to land assembly might be appropriate should be clarified, with guidance on how such an approach can be provided.
- Any valuation requirements should not put a burden on the public purse. At present land is too often valued at housing value, making the delivery of schemes unnecessarily challenging. Circular 4/1998 on planning conditions is currently a barrier where developers could play a part as it restricts actions that can be seen as 'planning gain'.

A concern was raised that the absence of a clear strategy on development of an infrastructure levy and Infrastructure Agency will lead to progress with land assembly and compulsory purchase projects being inhibited.

Other comments also addressed compulsory purchase, with the connection sometimes made to the use of Vacant or Derelict Land. They included that no one should have the power to create gap sites and derelict spaces in towns and cities or hold up vital infrastructure, but that landowners should be encouraged to adopt a responsible and voluntary approach to land reuse.

However, it was suggested that, if necessary, compulsory measures such as Compulsory Sales Orders could be used to bring sites back into productive use, support the infrastructure first approach or the creation, development or connection of green infrastructure or networks.

In terms of the policy or approach to be taken forward it was suggested that it should be flexible/adaptable, including because of the need to respond to economic change. Other comments included that:

- The purchase of vacant and derelict buildings to facilitate the improvement of town centres needs to be built into NPF4.
- Local authorities should be given powers to forward-purchase and prescribe what developments should look like.
- Community buy outs of land should be given priority.
- Enabling the compulsory purchase and then rewilding of grouse moors could offer major environmental benefits.

Natural environment

Proposed key objective of NPF4: To protect, enhance and promote access to our natural environment; whilst supporting their sustainable use and securing positive effects for biodiversity when considering new development. This includes identifying and affording protection to international, national and locally designated areas and sites in development plans and development management, including having regard to the desirability of preserving peatland

Suggestions with respect to the wording of the key objective included:

- Protection and enhancement of biodiversity needs to be clearly set forward in the key objective rather than implied as part of a broad natural environment statement.
- Amending the objective to read: *'To protect, enhance and restore nature, securing positive effects for biodiversity when considering new development. This includes identifying and affording protection to international, national and locally designated areas and sites and their species in development plans and development management to prevent damaging proposals being brought forward in these locations. To promote sustainable access to our natural environment.'*

It was suggested to be important that NPF4 and the Land Use Strategy are closely aligned or are integrated effectively to prioritise the land use changes needed to achieve positive action on both climate and biodiversity. It was also argued that planning authorities need to have more focused input into the next Land Use Strategy in order to ensure a targeted approach to climate change and biodiversity that considers local conditions and circumstances.

The inter-relationship between the climate change emergency and the natural environment were highlighted and it was argued policies designed to contribute to meeting net-zero carbon targets must also take account of opportunities to enhance biodiversity and aid nature recovery. In a similar way to climate change, biodiversity should be integrated though out NPF4.

It was also suggested NPF4 must retain the recognition in current SPP that the environment is a 'valued national asset', and that planning has a role in protecting the environment, enhancing it, and promoting access. Requiring every development to be compatible with the National Outcome for the environment - 'We value, enjoy, protect and enhance our environment' – was proposed and that any development contrary to any aspect of this outcome should not proceed.

Recognising the importance of community environmental stewardship and traditional practices in maintaining and supporting a range of unique habitats, biodiversity and iconic landscapes in rural and island areas was also proposed.

There were calls for creation of a Scottish Nature Network or Ecological Network. The Scottish Nature Network - proposed as a National Development – was described as 'a spatial network of natural assets that would guide and inform long-

term investment in Scotland's green infrastructure. Helping to align and co-ordinate the achievement of shared objectives across planning and land use sectors particularly in terms of taking action on the climate and nature crises at local, regional and national scales.'

Identifying international, national and locally designated areas

SPP guidance on development within national and international designations was suggested to be clear and the current hierarchy of policy for international, national and locally designated areas to be robust and to work well. Reviewing and updating the approach to the identification and protection of areas of the highest scenic and landscape significance including National Parks and National Scenic Areas was also suggested.

It was argued that as well as statutory and non-statutory designated sites, connecting habitat should be protected, as the value of ecological networks will be increasingly important with the effects of changing climate on species ranges.

Locally designated sites were argued important to both the sense of place of local communities and in attracting tourism, with UNESCO Biospheres given as examples of the type of sites that might be appropriate for local designation. It was suggested many of the landscapes most valued by local people in rural Scotland are designated as Local Landscape Areas or Special Landscape Areas, and that these should be given strong protection from damaging development in NPF4. Preparation of Management Strategies for Scotland's 33 National Scenic Areas was proposed as a National Development.

With respect to the process of designation of sites it was suggested that it would be useful for more guidance on local designation to be available or for existing guidance to be reviewed and integrated into SPP. Lack of a standard methodology, and staff resources and expertise were identified as limiting inclusion of local sites in LDPs.

A rather different position was that the existing national parks and statutory environmental designations provide sufficient protection to areas of special character, and that an increasing number of areas subject to local designations are placing too many restrictions on wind farms.

Specific sites

Stronger protection for the most important wildlife sites was proposed to make it clear and unambiguous that protected areas are not appropriate places for large scale development, unrelated to the conservation management of the site.

Specific suggestions included better protection for ancient woodlands and for Ramsar sites²⁸. With respect to the latter it was argued Ramsar sites and all their listed habitats and species should be given equivalent protection to Natura 2000 sites.

²⁸ A Ramsar site is a wetland site designated to be of international importance under the Ramsar Convention.

Wild Land

Clarity around the status of Wild Land was suggested and it was noted this is, in effect, a designation in every way other than its actual status.

There were calls for NPF4 to retain or strengthen the existing protection for Wild Land, including making clear that any proposed development that could lead to part of the land losing its Wild Land status would be refused.

Specific suggestions included:

- The Wild Land Areas map should be retained as part of a spatial framework and areas identified could be given equivalent status to National Scenic Areas or recognised as part of a national Nature Network.
- The attributes of Wild Land Areas could be recognised in less remote places.
- LDPs should specifically address any Wild Land in their areas, stating how these will be preserved or, if developed, how their special qualities will be maintained.
- There should be engagement with local communities.

As noted under the *Energy - electricity* theme, concerns were also raised regarding the inclusion of Wild Land within Group 2, including because there is no formal designation for Wild Land, and that current SPP sets the bar for development too high for any wind energy scheme to satisfy. Any further protection for Wild Land was suggested to risk having a detrimental effect upon economic development and social sustainability in some areas.

Recognising the role of national parks

It was suggested that NPF4 should continue to recognise and protect the national importance and special characteristics of Scotland's National Parks and their potential to contribute to climate and nature emergencies. It was also noted that national policy criteria can establish the role of national parks in conjunction with, not in isolation from, other designated or protected areas.

There was a call for designation of a suite of new national parks, including in Galloway and in the Borders. This was suggested as a National Development. Consideration of a role for Coastal and Marine National Parks was also suggested.

With respect to planning in National Parks it was argued that:

- The powers available to National Park Authorities should be reviewed with a view to strengthening their control of development.
- Development plans and planning decisions for National Parks should be consistent with the first objective of National Parks – 'To conserve and enhance the natural and cultural heritage of the area'. A development category for ecological restoration within a National Park's development plans could help Parks to fulfil this objective.
- New settlements in National Parks would be both unsustainable and inappropriate and should be ruled out.

- No major developments should be permitted in National Parks, except in exceptional circumstances.

A relaunch for Scotland's existing Regional Parks was also proposed, along with consideration for new Regional Parks, for example in the Ochil or Kilpatrick Hills.

Positive effects for biodiversity

Many respondents commented on the importance of biodiversity, including that NPF4 should include policies to safeguard, protect and enhance biodiversity or that, like climate change, biodiversity should be integrated though out relevant topics. The importance of large areas and networks of habitat were highlighted.

Suggestions included that NPF4 should:

- Define biodiversity.
- Reflect regional variations in biodiversity.
- Recognise the place of Local Biodiversity Action Plans and incorporate an action plan into all spatial planning decisions.
- Set out the role of key agencies and other stakeholders in securing positive effects for biodiversity. Embed more landscape architects and ecologists into planning authorities.
- Recognise the contribution the historic environment makes to landscapes and how it relates to biodiversity.
- Address how biodiversity is to be incorporated into development plans and how local authorities will measure 'positive effects' when assessing a planning application. 'Positive effects' was suggested to be too vague.
- Provide general policy that can be applied across different scales of development and in different locations.
- Adopt a policy requiring development to deliver 'positive effects for biodiversity' through a mechanism that is yet to be specified.
- Support the concept of biodiversity net gain.

Suggestions with respect to biodiversity net gain included that it should be:

- Promoted in all new developments and redevelopment/ regeneration schemes; mandatory for all government and public sector actions; or applied to commercial development which does not primarily serve any community or public need.
- Assessed against the potential of an environment not its current condition.
- Underpinned by a set of principles to guide delivery.
- Enforceable.

It was noted that the principle of net gain has already been introduced in English planning policy, so a methodology is already established.

The importance of development following the mitigation hierarchy was emphasised, so that, wherever possible, adverse impacts on biodiversity are avoided and

alternative options pursued. Where adverse impacts are unavoidable, suitable mitigation measures should be secured or, where this is not possible, compensatory measures should be considered.

An Energy Company highlighted their own commitment to biodiversity no net loss outcomes for new projects, and their aim to drive environmental stewardship best practice in the industry as part of wider sustainability ambitions.

It was also argued that some parts of Scotland's valued environments can accommodate certain types of development, where it can be demonstrated that there will be no adverse environmental impact or where it can be demonstrated that there will be net-gain in biodiversity, and that primacy must be given to EIAs when determining applications.

Alignment with existing environmental legislation

It was suggested that NPF4, the Land Use Strategy, the Regional Land Use Frameworks, and sector-specific policies such as the Forestry Strategy need to be integrated. Integrating relevant policies was also suggested to have potential to support the integration of data and mapping in decision making.

Specifically, it was suggested NPF4 should:

- Be compatible with existing pieces of environmental legislation and provide guidance as to how they apply to planning.
- Reference other strategies where relevant but be useable without reference to multiple external documents.
- Endorse existing environmental legislation and the policies and guidance from the key agencies - SNH, SEPA and Historic Environment Scotland.
- Provide guidance on how the Forestry and Woodland strategies can or should align with proposed LDP development strategies.
- Be aligned with any future legislation on post Brexit environmental standards.

Protecting soils

It was suggested that the current approach of protecting the best quality agricultural land and the increasing emphasis on protecting peatland and carbon rich soils should be continued. The complexity of soils in ancient woodland was also highlighted and argued likely to be damaged by disturbance even if there is no loss of trees. Policies on avoiding soil compaction around trees and encouraging compliance with BS 5837:2012 were suggested.

Supporting creation of woodland

There were calls for creation of more woodland, particularly of native species, including in both upland areas and urban areas. The value of afforestation of upland areas in providing catchment-scale flood mitigation was highlighted.

It was suggested planning can support woodland creation through implementation of the Land Use Strategy, mapping of areas of opportunity that take account of sensitive habitats such as peatland and guiding the spatial strategy for 'the right

tree in the right place'. Policies to ensure new woodland and forestry planting is not to the detriment of priority species that depend on open habitats were suggested.

It was also argued that a potential conflict between major forestry expansion and the need to protect peatland and carbon rich soils should be recognised, and pilot work by Scottish Forestry and Councils in southern Scotland was suggested to provide a possible route to identifying less sensitive areas for forestry expansion.

Woodland creation could also be supported through a requirement for LDPs to identify and safeguard opportunity areas, ensuring that opportunities are not lost to other forms of development.

It was also noted that, while the 2019 Act tasks planning authorities with developing Forestry and Woodland Strategies, the promotion and control of forestry planting does not come under the remit of the planning system.

Protecting existing woodlands

The importance of protecting existing woodland was also highlighted with proposals that:

- There should be a presumption against development which would destroy areas of established woodland.
- Scotland's temperate rain forest should be conserved and restored.
- There should be stronger protection or statutory protection for ancient woodland and veteran trees. Compensation through securing other positive effects for biodiversity should not be considered with respect to removal of ancient woodlands.
- The Ancient Woodland Inventory should be updated using mapping of ancient woodlands carried out during production of Forest and Woodland Strategies.

Balancing competing requirements

With respect to the requirements for renewable energy and preservation of peatlands it was suggested that:

- NPF4 should provide a clear steer on planning policy in regard to new waves of renewable energy development, in particular in relation to areas that are identified as having significance in terms of their landscape, biodiversity and/or carbon sequestration values.
- The planning system should not prevent onshore wind developments on peatland where the resultant development will have a short carbon payback period, other mitigation can be put in place, and where development can improve degraded peatland under existing good practice guidance.
- NPF4 should recognise that renewable energy projects can provide wider environmental benefits, such as contributing to resilient ecological networks, restoring degraded peatlands and restoring grasslands. Solar PV was argued to be completely compatible with continued grazing by sheep or the establishment of biodiversity havens.

- NPF4 should recognise every area has a carrying capacity for onshore wind, and some areas are getting close to this limit. A national overview was suggested to ensure that all areas with potential for renewable energy are making a proportionate contribution.

Peatland

Proposed key objective of NPF4: To have regard to the desirability of preserving peatland so that climate change benefits of reducing emissions and other benefits including to air and water quality, biodiversity and habitat creation and flood alleviation are realised.

The important roles of peatland in storing carbon, maintaining biodiversity and flood mitigation were all highlighted, as was the value of the archaeological and palaeoenvironmental deposits that may be preserved in peatlands.

However, there were differing perspectives on the priority that should be placed on preserving peatlands. Comments on the proposed key objective included both that:

- The wording should be strengthened so it is a requirement to preserve peatland, rather than just being desirable.
- The desirability of preserving peatland should carry less weight in NPF4 and should not hinder renewable energy development.

Suggestions for measures that might be taken with respect to policy and guidance on preserving peatland included that:

- Protecting peatlands should be a National Priority.
- There should be a presumption against the disturbance and/or removal of peatlands, and that consideration should be given to a moratorium on development on Class 1 peatland.
- NPF4 should adopt a clear stance on peatland and soil conservation and management, with clear definitions for different peat and soil types. Consistent definitions of peat and carbon rich soils should be used across Government and National Organisations.
- Different grades of peat should be distinguished, so that healthy eco-systems are distinguished from peatlands that are already degraded. A definition of what constitutes deep peat is needed, and stronger policies are required to prevent development on deep peat.
- SNH's Peatland Map should be used to inform spatial guidance for onshore wind, and potentially other types of developments.
- Farmers that have peatland on their land should receive payments for maintaining peatlands.

The importance of spatial strategies and Regional Land Use Plans (RLUPs) in protecting peatland were noted and it was argued that there should be rigorous, independent assessment of all proposed development on peat, using up-to-date guidance.

Extraction

There was a call for an end to commercial extraction of peat both from viable or restorable peatland and from all peatlands. Extraction of peat for horticulture was

highlighted, with an associated suggestion that sale of peat-based composts (including imported material) should cease. It was also argued existing extraction permissions should end, with a specific suggestion that this should happen by 2023. A review of the peat extraction needs of the whisky industry was also suggested.

Although a ban on commercial peat extraction from degraded peatlands was proposed, one Local Authority noted that they would support an approach that allowed peat cutting on already degraded peat areas. Peat cutting for domestic fuel in the Western Isles was also suggested as an exception to a ban on extraction.

It was also argued that practices such as muir burning should be discouraged or phased out.

Development on peatlands

Criteria for development

With respect to development on peatland it was suggested there need to be clear criteria for what is and is not acceptable. Policy guidance on development appropriate on Class 1, 2 and 5 soils was requested in particular.

Criteria suggested for considering development on peatland included:

- A specific locational need for the development.
- A small-scale development connected to a rural business.
- Development for renewable energy generation or mineral extraction which will be fully restored afterwards, and where it can be demonstrated that the adverse impacts on the peatland resource during the construction and operational phases of a development will be minimised.
- Development that will not result in a net increase in CO₂ emissions over its lifetime.

It was suggested that policy on development on peatlands needs to provide some dispensation in the Outer Hebrides, due to the large amount of land covered by peat.

With respect to onshore wind development it was argued the climate emergency requires that significant harm should be demonstrated in order to prevent development that is needed to meet renewable energy targets. It was suggested that many upland peat areas have already been used for commercial purposes such as country sports and commercial forestry and may be degraded habitats to which restoration work brings biodiversity net gain.

Assessing impact

With respect to onshore wind it was suggested carbon losses from development on peat should be assessed using the carbon calculator that has already been developed, and that this requirement should apply to all windfarm proposals, even those under 50MW. Further policy guidance on an acceptable carbon payback periods for windfarm developments was suggested to be necessary.

Points on the working of the carbon calculator included that:

- Both the calculator and guidance for impact assessment should be updated to capture present understanding of the carbon and ecological significance of peat.
- The calculator limits the transparency of scrutiny and the ability of third parties to comment quantitatively on wind farm applications and its use in assessing planning applications should be reviewed.

Some means of quantifying the carbon impacts of other types of development on peat was also suggested.

Lack of clear guidance on the assessment of carbon impacts was argued, and the need for clarification of acceptable thresholds and good practice for different development types was suggested. It was proposed that there should be a single Scottish agency responsible for assessment and advice on carbon impacts, and that the assessment of a proposed development in the context of emission reduction targets should constitute a material planning consideration.

Other land types which should be considered for protection

It was suggested it would be appropriate to protect saltmarsh and native woodland due to their ability to both sequester and store carbon.

It was also argued that, while clear guidance should be provided about other land types which could be protected due to their contribution to greenhouse gas emissions reductions, local authorities should decide the level of protection. This was suggested necessary to ensure development is not unreasonably constrained in areas where there is a high percentage of these land types and other carbon rich soils.

Restoration

Respondents pointed to the importance of restoration of peatlands, with suggestions this should increase and that, where possible, peat forming function should be restored. It was suggested developers should undertake remediation work to badly damaged areas in mitigation of emissions released through development. An Energy Company respondent highlighted the roles that onshore wind developers can play in peatland restoration – noting their own involvement in restoration of blanket bog degraded by drainage for agriculture and commercial forestry plantation. Another suggested it might be possible for large-scale solar PV development on degraded peatland to be designed to support the restoration of that peatland.

It was also suggested that:

- The mitigation hierarchy should be applied to ensure development minimises impacts in the first instance and that biodiversity net gain to ensure enhancement is delivered.
- Restoration should be regulated, including because of the potential risk of damage to archaeological features.

- Sites should have a peatland restoration assessment carried out by SNH and management plans should be prepared for damaged areas.
- Further guidance on how to restore degraded peat would be useful.

Placemaking

Key objective of NPF4: To deliver sustainable, well-designed places and homes that meet the needs of people living in Scotland including, in particular, the housing needs for older people and disabled people. This will be done through a design-led approach which demonstrates the six qualities of successful places

Importance of placemaking

Either as a statement of support for the proposed objective, or as part of wider comments, a number of respondents highlighted the key role of placemaking, including as central to the purpose of planning and integral to achieving many of the NPF Outcomes. There was a consensus that placemaking should remain central to NPF4, which should continue to identify the qualities of successful places in Scotland, particularly in terms of:

- Promoting multifunctional landscapes, with greenspaces, active travel options, renewable energy systems and thriving public spaces.
- Safeguarding and growing locally resilient and self-supporting communities which have local access to quality and appropriate facilities and services.
- Creating communities that can provide the context to encourage healthy lifestyles and which promote wellbeing. It was reported that the different functions of urban and natural environments all contribute towards quality of life and physical and mental health and are all components of the overall quality of place.
- Protecting and enhancing the unique character of our special places.
- Mitigating against climate change and improving biodiversity.
- Enabling alignment of economic development, land use planning, and transport and infrastructure investment.

General points around how the placemaking approach brings value included that:

- Placemaking connects many planning policy themes.
- Designing for people and place rather than engineering environments is key, and planning needs must be based on the needs of local communities.
- Placemaking is key to both delivering new development as well as regenerating existing communities.
- The Place Principle provides a shared understanding of place, it helps overcome organisational and sectoral boundaries, encourages better collaboration and community involvement, and improves the impact of combined resources and investment.
- The approach allows for greater cohesion and co-ordination across local authority areas. This should include at city region or RSS area level, through consideration of any cross-boundary issues.

Broader changes

In terms of how NPF or SPP may need to refocus or change in relation to placemaking, comments included that:

- NPF4 should focus on place outcomes and ensure these cannot be outweighed by other discrete policy outcomes.
- The emphasis/language used could sometimes be stronger. For example, with reference to directing the right development to the right place, the references to ‘considering’ the reuse or redevelopment of brownfield land or the contribution of green and open space networks, should instead refer to ‘prioritising’.
- The emphasis should be on ensuring policy and planning is co-ordinated, consistent, and coherent across sectors. NPF4, the Land Use Strategy, Regional Land Use Frameworks, and the Forestry Strategy need to be better integrated.
- There should be a greater emphasis and alignment with health and wellbeing policies and outcomes. In particular, the articulation of the six qualities of a successful place²⁹ would be a good starting point for ensuring the consideration of health and wellbeing is integral to planning decisions but may benefit from a more specific focus on health and wellbeing, including around another of the public health priorities concerning healthy weight and the ‘food environment’.
- Planners and designers need to go further to harness and utilise the knowledge of communities and encourage active participation. Community engagement and participation is covered in more detail under the *Sustainability* theme.
- Policy needs to consider existing communities and how they can be supported. The current policy is more appropriate for new development.
- Equity is important, so it is misleading to focus on specific groups in the objectives (like older or disabled people, for example).

It was also suggested that the current policy seems more suited to cities, towns or large-scale development and that it is currently difficult to apply all of the six principles of a successful place in a rural context. It was also suggested that the different elements and the language used presently in Scottish Government design policies and guidance documents does not translate well to a rural/open countryside location.

There was a call for some flexibility for rural areas and islands without watering the policy down for urban areas. Specifically, it was suggested that the Scottish Government should consider supporting or creating design tools for more rural locations. Other suggestions included:

- Adding biodiversity as a seventh principle of quality places.

²⁹ The six qualities of successful place are that it is: distinctive; safe and pleasant; welcoming; adaptable; resource efficient; and easy to move around and beyond.

- Being more prescriptive in the language used relating to design. The pressure to deliver new development should not compromise the ability to deliver high quality design.
- While SPP states that proposals may be refused on placemaking grounds only, this is still relatively rare. Tying in placemaking with public health objectives, biodiversity and climate change mitigation could help emphasise its importance and tackle the perception that placemaking and design is about aesthetics.
- Strengthening the policy wording and providing more clarity on some criteria would be useful - for example how to interpret and enforce the 'distinctiveness' principle where development is dominated by mass house building.

Plan-led, integrated approach

There was a view that NPF4 provides an opportunity to lay the foundations for a more plan-led approach to development in which community wellbeing takes centre stage. To that end, it was suggested that:

- NPF4 should consider encouraging and promoting the need for planning to collaborate with other parties within local government and beyond to enable the delivery of high-quality development.
- There must be a strong relationship between NPF4 and spatial and healthcare planning. Moray Council's Policy PP1 Placemaking was cited as offering a good example of such an approach.
- The public sector will have a key role to play in ensuring objectives and policies are carried forward into day to day decision-making. Proactive partnership working will be crucial to deliver great places in the right locations – as opposed to letting the market decide where development happens.

Specifically, it was proposed that NPF4's placemaking policies and document structure should support other policies by first ensuring appropriate cross-references to them. Thereafter the six qualities of place could be utilised, and examples provided of what could/should be considered under each – this could then help link to other national policy documents and/or other NPF policies.

There was also reference to the relationship between placemaking and LDPs. It was suggested that LDPs should take account of existing data on socio-economic performance and wellbeing, to support the development of place-based policies. Other suggestions included that:

- SPP could require LDPs to reflect all local spatial strategies across climate resilience, energy generation, housing, healthcare, connectivity etc. so as to support a place-based approach.
- Guidance should be provided on how to include placemaking in LDPs.

It was also suggested that a National Landscape Advisor should be appointed to the Scottish Government to help shape the development of Scotland's Landscape, Land Use and Infrastructure Plan and to work across Directorates to achieve consistent and joined-up thinking and inform Local Planning Authority decision-

making. This change was seen as demonstrating the Scottish Government's commitment to the Place Principle by working holistically between its own Directorates and with other stakeholders and that this approach would also permeate down to LPA decision making.

Local Place Plans and the Place Standard tool

A number of respondents commented on LPPs, including suggesting that a clear statement on how LPPs fit into the plan-making process would both support a co-ordinated approach to placemaking and ensure consistency between plans.

It was reported that research has found that the majority of the public think they have no influence on the planning system, but that NPF4 offers an opportunity to turnaround these perceptions and more fully engage citizens with how Scotland's physical environment is changing. To this end, it was suggested that the LPP provisions in the 2019 Act can form the foundation of better community engagement.

There was a call for LPPs to be written into NPF4 narrative and policy as a key vehicle for meeting its aims, and that there should be references to the provisions of the 2019 Act, giving them appropriate status within relevant LDPs and in subsequent decision making. There were also calls for resources to be made available to support communities in developing and delivering their plans, including a suggestion that NPF4 should recommend those resources be made available. Other suggestions included that:

- It will be important to be clear about how LPPs fit into the current hierarchy of plans, in particular how they fit with the NPF with its current timetabling.
- LPPs need to tie in with Community Planning Locality Plans.
- There should be a clear policy direction and status for LPPs, which should incorporate deliberative public involvement mechanisms into the participation statement of NPF4 and provide clear statement of how and where LPPs will be able to influence a ten-year NPF plan.
- Clear guidance on their role needs to be developed.
- NPF4 should also set out the design tools needed to ensure key places are protected and enhanced, in particular in LPP areas, and any community growth areas and major developments.

There was also support for the use of the Place Standard and it was recommended that NPF4 embeds and champions the Place Standard themes. It was suggested that the Place Standard tool³⁰ is a useful way to engage communities on place. In terms of how the Place Standard should be used, suggestions included that:

- NPF4 should encourage use of the Place Standard tool in the early stages of preparing LDPs, masterplans and major pre-application consultations.
- The need for developers to use the tool should also be emphasised, including that they should be able to demonstrate how the principles set out in Creating

³⁰ Available at: <https://www.placestandard.scot/>

Places and Designing Streets have been incorporated into development proposals.

Inclusive places

Some comments addressed the creation of inclusive, intergenerational communities, including delivering places and homes that meet the needs of older people and disabled people.

There was a call for NPF4 to consider how planning can create places which meet the needs of different generations, especially younger and older people. In support, it was suggested that planning is fundamental to designing and developing high-quality places that serve the needs of everyone, and regenerating communities fit for the future. There was specific reference to Scotland's planners having a pivotal role to play in upholding the rights and improving the livelihoods of our children and young people who grow up in these places now and inherit them in the future.

It was reported that there is a lot of discussion and best practice being developed which could be highlighted and encouraged. There was reference to a Mobility, Mood, Place project carried out by The University of Edinburgh, and to the potential for NPF4 to encourage intergenerational housing, play streets and integrate the 'caring place' principles developed by Architecture and Design Scotland. The experience of PAS in facilitating a post asset transfer engagement process to create an intergenerational centre in a primary school building was highlighted as an approach which could be replicated around Scotland and would help create more inclusive places and resilient communities.

Other comments or suggestions around how NPF4 should address this issue included that:

- NPF4 should set an aim of creating intergenerational places which include homes of different sizes (studios to large family homes) and tenures, homes offering design flexibility, and facilities to meet the needs of all generations.
- Self-build, co-housing, live/work homes, homes aimed at young people and 'whole-life' homes (the design of which can change flexibly over the lifetime of an inhabitant) should be encouraged and made easier to deliver. Private rental sector and middle-market rental accommodation also need to be included in this debate.
- The social infrastructure of places is important, and it is essential that Scotland's new and existing places are developed to create intergenerational communities and enhance sociability. Often, local projects to create this sort of social infrastructure will be led by communities, potentially around the reuse of existing but unused buildings.

It was also suggested that the meaning of adaptable should be expanded, and that the focus should be on design that meets the needs of older people or the disabled, for example with wide paths around houses, and buildings that work well in hot weather.

Well-designed places and density of development

Other comments focused on design, with one perspective being that the current approach can be too focused on design rather than outcomes for communities. It was reported that it is rare for planning applications to be refused based on poor design and the current SPP does not provide the clarity that would be necessary to do so.

It was suggested that design and performance must be pushed up the agenda so poor layout, design or response to the landscape context of a proposal become primary reasons for refusing applications, and that the same should be true in terms of measures to address future climate.

Specific suggestions included that:

- Designing Streets³¹ provides a good starting point for considering what standards and approaches statutory policy should prescribe. It should be reviewed, and the next iteration should become part of NPF4.
- Any national policy focus on design should be supported by other initiatives to promote good design. There may be opportunities to extend the remit of the Improvement Service for example.
- Design panels may be beneficial and related guidance would be welcomed.

Other comments focused on the urban or suburban form, and the density of development. Some of these comments identified benefits that flow from increased urban densities, including that:

- The compactness of the urban form plays a critical role in determining carbon emissions and the carbon intensity of a given population. They also support a range of placemaking objectives which can influence less carbon intensive lifestyles.
- Dense, compact settlements require less infrastructure than sprawling development patterns. They also promote a number of mutually reinforcing co-benefits for climate resilience and health and wellbeing, such as walkability and public spaces in close proximity.

Other comments included that, while increased urban density has a clear link with reducing carbon emissions, a policy framework is required that achieves this without compromising on quality of place. In terms of how this could be taken forward through planning policy, it was suggested that NPF4 supports explicitly the compact urban model across Scotland but also focuses on the delivery constraints associated with this policy. A specific suggestion was the introduction of a minimum homes per hectare density of 65 homes per hectare, with provision for a minimum of 100 per hectare to be specified in some areas, proposed.

It was noted, however, that these proposed densities may not suit many smaller settlements and it was suggested that national policy needs to consider appropriate densities for settlement types and scales, while supporting higher density in

³¹ Available at <https://www.gov.scot/publications/designing-streets-policy-statement-scotland/>

appropriate locations to promote placemaking, public and active travel use and climate change adaptation. Although recognising that increasing density must be a key objective to reduce the loss of agricultural land, it was stressed that density must be set within its local context.

Other aspects that respondents identified as requiring consideration included that:

- Density alone is not the answer for urban areas and requirements for mixed use, local neighbourhoods with commercial and community facilities need to have a more significant emphasis in national policy and be interspersed with green spaces and wild areas.
- Stronger guidance on plot densities in terms of building heights is required, including on the spatial relationship between neighbouring buildings and how to identify the limitations that places on the development of a site.

Development management, including housing development

In terms of how national planning policies can best support the delivery of existing core placemaking policies in development management whilst recognising the need for local flexibility, suggestions included:

- Developing a clear set of standards that can be used to refuse development, including for major and small-scale developments and single buildings.
- Using a traffic light score, and only supporting proposals that achieve a green score. An amber score would identify where there are issues that can be fixed and a red score would mean it conflicts with policy, or the issue cannot be mitigated against.
- Taking a continued stance to refuse developments with poor design using design tools referred to in SPP paragraph 57 and Creating Places³² page 10 'What is good design'.

It was also suggested that NPF4 provides an opportunity to guide greater alignment of planning and roads consenting services, ensuring each works to a shared set of goals and principles. NPF3's articulation of the relationship between the LDP and the LHS was cited as a good example of a helpful approach.

With specific reference to managing the development of housing, comments included that placemaking should be a key focus for all involved in development delivery, with a focus on quality not quantity. A concern was raised that, if local authorities are more pressed to meet housing targets than community wellbeing, they can be forced to ignore other important outcomes, for example in terms of community connectedness, community voice, combatting isolation, supporting healthy lifestyles and reducing carbon emissions. There was also a concern that the approach set out in the Housing Technical Discussion Paper (and covered under the relevant section of this report), would continue to result in conflict, with a very numbers-driven approach, minimal local influence, and no focus on placemaking.

³² Available at <https://www.gov.scot/publications/creating-places-policy-statement-architecture-place-scotland/>

It was suggested that the use of the Place Principle and the NPF will help ensure that decisions are made 'in the round' and all the trade-offs are thoroughly considered. Other comments included that:

- Community buy-in will be greater where there is confidence essential infrastructure will be provided and where the benefits of development to quality of life, health and wellbeing are clear.
- It will be important to ensure that all new major developments are mixed use and are designed to include, or be connected to, amenities. Large housing developments should incorporate commercial use and, likewise, large commercial proposals should incorporate residential use, planned within the wider urban design.
- NPF4 may wish to consider how sustainable rural settlement patterns can be created and to whether whole new settlements are needed, perhaps on the edge of cities. These could be created with a new development model based on the new town approach and aimed at addressing Scotland's need for affordable homes.
- Building on paragraph 187 of SPP, NPF4 should require planning authorities to work collaboratively with home builders when previously agreed masterplans need to be updated to reflect changes in circumstance – ensuring they function as an enabler of high-quality development, not a barrier to its delivery.
- NPF4 should identify that masterplans should only be used where they can add greatest value. NPF4 could also articulate a simple, common, non-legislative process for agreeing and reviewing masterplans.

Sustainability

Key objective of NPF4: To ensure that the planning system supports the Scottish Government's purpose of focusing on creating a more successful country with opportunities for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth which is achieved with a view to achieving net-zero emissions by 2045.

Importance of, presumption in favour of sustainability

In addition to sometimes offering support for the objective, general comments included that sustainability will be even more important looking further into the future and that the presumption in favour of sustainable development should remain a component of national planning policy. It was suggested that the overarching principle of the planning system should be sustainable development, and this like climate change, should run as a thread through the entirety of NPF4.

One perspective was that the current presumption in favour of sustainable development, as both a concept and a material consideration, is a source of confusion and does not work well. It was noted that 'sustainability' is a wide-ranging term and there was a concern that this could result in a lack of clear direction on priorities or how sustainability can be measured or assessed.

Specifically, it was seen as helpful to clarify:

- What is meant by sustainable and inclusive economic growth?
- What constitutes sustainable development?

There was a call for any definition of sustainable development to align closely with NPF4's defined outcomes, with emphasis in particular on climate change, inclusive growth and wellbeing.

However, it was also suggested that a catch-all outcome of sustainability remains appropriate because it is broad in scope which allows new and emerging issues to be addressed over the lifetime of NPF4.

United Nations Sustainable Development Goals

There was support for NPF4 being aligned with the United Nations Sustainable Development Goals³³, although it was suggested that not all the goals may be appropriate, including because some are very much focused at a global level. Nevertheless, the potential for NPF4 to translate some of the goals into a Scottish context was highlighted. Specific suggestions included that:

- Goal 7: Affordable and Clean Energy, is relevant to the climate emergency.
- Some goals should be given particular attention. These included Goal 3: Good Health and Wellbeing; Goal 5: Gender Equality; Goal 7: Affordable and Clean Energy; Goal 8: Decent Work and Economic Growth; Goal 9: Industry,

³³ Available at: <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

Innovation, and Infrastructure; Goal 10: Reduced Inequalities; Goal 11: Sustainable Cities and Communities; Goal 12: Responsible Consumption and Production; Goal 13: Climate Action; Goal 14: Life Below Water and Goal 15: Life on Land.

- The historic and built environment has the potential of the to contribute to Goals 3, 7, 8, 9, 10, 11, 13, 15 and 17.

Relationship with addressing climate change

The main analysis of comments relating to climate change is presented under that theme. With specific reference to and in connection with sustainability, points raised included that:

- ‘Sustainability’ effectively captures the policy drivers of climate change, inclusive growth and human wellbeing as it is based on social, economic and environmental pillars.
- The concept of sustainability needs to acknowledge the immediate nature of the climate emergency.
- NPF4 needs more detailed policy positions on matters including carbon emissions, biodiversity and development, rather than the more general outcome of sustainability.

There was reference to the proposed key objective of NPF4 in relation to climate change³⁴ and it was suggested that the relationship between the climate change and sustainability objectives reveal tensions in the general direction of travel of national planning policy. A connected point was that, if climate change targets are to be achieved, NPF4 will need a new hierarchy, which puts improving the environment and society first, setting an ambitious, optimistic and co-ordinated vision for a sustainable Scotland and providing a route map for the economic strategy to follow. Similarly, there was a call for NPF4 to set out a vision of a Scotland where the economy is sustainable and aligned with climate targets.

The two possible meanings of sustainability were highlighted - one being ‘environmentally-aware’ and the other being ‘capable of continuing’. It was argued that the usual usage of ‘sustainable economic growth’ is growth which continues, but that the inclusion of ‘sustainable’ adds an aura of growth which is environmentally respectful. It was suggested that pure growth should not be the nation’s primary economic objective – rather, the aim should be a sustainable society and economy. There was an associated call to replace ‘sustainable economic growth’, with a term such as ‘sustainable society’.

With specific reference to carbon emissions, it was suggested that the strongest influence planning can have is directing development to locations that are sustainable or can be made sustainable, with regard to how people travel to these places or how they are powered and heated. It was noted, however, that sustainability relates to more than carbon emissions, but includes the creation of

³⁴ To ensure planning policy results in spatial and land use change that facilitates Scotland’s ambition to have net-zero emissions by 2045 and other statutory emissions reduction targets whilst supporting communities and businesses in making the changes needed to meet the targets.

successful places that will endure and enhance the economic and social wellbeing of communities. It was considered important for NPF4 to be clear about what sustainable development is and how it is to be measured.

A number of the National Development proposals submitted, including some of those involving the use of brownfield and former industrial sites, focused on sustainability and the creation of low or zero carbon sustainable communities which provide healthy and inclusive places to live and work.

Sustainable economic growth

The connection was often made between inclusive economic growth and reducing inequality and tackling deprivation and it was noted that sustainable and inclusive prosperity is a central objective of the NPF³⁵ towards which all policies should work.

It was also reported that in some areas, including parts of the west of Scotland, the current economic system has reinforced inequality. It was reported that in the past the role of planning has been diluted and is often restricted to facilitating the market, meaning its role in the delivery of sustainable economic growth has focused disproportionately on short-term economic outcomes. Going forward, the concern was that without a coherent and co-ordinated realignment of all drivers of the economic system, any realignment of the planning system will be an isolated and ineffective exercise.

It was also suggested that any review or realignment should consider inequality based on protected characteristics and socio-economic status and not just based on regional or geographic inequality. A place-based deprivation approach was preferred, with the PSED and 'Fairer Scotland' duty seen as providing a structure to support planning, inquiry, assessment and monitoring to ensure that spatial policies address inequality successfully.

It was also suggested that NPF4 should support inclusivity and community wealth building, including by ensuring that communities are all benefiting from the local economy through support for a diverse range of local businesses and approaches to create a resilient community. Other proposals for how NPF4 could support the building of a sustainable economy included:

- Taking a 'Community Wealth Building', people-centred approach to local economic development, which redirects wealth back into the local economy, and places control and benefits into the hands of local people.
- Ensuring that economic success is built into place-based decisions. It was observed that the Place Principle and Place Standard are important for an economic vision which recognises health and wellbeing.
- Providing the framework for a more active regional policy including regional prospectuses.
- Pursuing a more structured approach to national and regional development that recognises the complexity of economic challenges and opportunities and

³⁵ Available at: <https://nationalperformance.gov.scot/>

which delivers added value to place through development gain, jobs, skills and training.

- Supporting the protection, restoration and facilitation of investment in nature that can help support a new, socially just economy which responds to the challenge of climate change.
- Emphasising that growth and investment in key sectors relies on environmental quality, infrastructure and the sustainable use of natural resources.
- Encouraging much greater public participation at a local and national level in planning decisions likely to affect them. Community engagement is covered further below.

Specific suggestions as to how sustainable economic growth could be progressed through NPF4 included:

- Changing the way in which grants, incentives and subsidies are administered so that they level up the gross inequalities between communities, public services and large business and landowners.
- Ensuring a diversity of ownership and investment when approving developments and, where appropriate, requiring community involvement and public benefit.
- Linking initiatives such as community benefit clauses to procurement to help support local economies.
- Directing provision, including of large public sector developments and possibly National Developments, towards areas most in need of an economic boost.
- Promoting the wider application and use of Sustainable Growth Agreements to promote sustainable development and low and zero carbon design principles and good practice.
- Continuing to invest in housing as an infrastructure priority and building homes with consideration of the wider infrastructure and facilities that are required for communities to flourish.
- Supporting the development and enhancement of hubs and creating conduits for entrepreneurship, workers, skills, training, goods and services.
- Promoting growth corridors as a means of linking hubs of economic activity and generating stronger outputs and improved outcomes for areas experiencing economic challenges.

Sustainable development and resource use

With particular reference to developing in a sustainable way, it was suggested that a whole systems approach that considers the environmental, social and economic impact of any planning decision should be presumed. The Brundtland report³⁶ definition of sustainable development was seen as helpful: '*sustainable*

³⁶ Available at: <https://sustainabledevelopment.un.org/content/documents/5987our-common-future.pdf>

development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs’.

It was suggested that delivering sustainable development is a key function of the planning system but that the planning system still requires support and guidance on this matter. In terms of key considerations or features of the approach, comments included that it should:

- Balance the total economic cost and social change together with the inevitable environmental consequences.
- Be built around an ecosystems services/eco-security approach that reflects best land use practices (at the national level for integrated decision making and the local level for practical implementation) to ensure that the collective pressure of all development and activity is kept within levels compatible with the achievement of good environmental status.
- Ensure that scarce and/or finite resources, such as land or minerals, are not squandered either deliberately or through ignorance.
- Recognise that different approaches may be appropriate to different locations and should allow for a degree of flexibility.
- Maximise opportunities for repurposing of existing assets. Specifically, it should support the reuse of existing buildings to support new economic activity and should explore a sequential approach to support this.

In terms of the repurposing of existing assets, further comments included that:

- A sequential approach could be based on developers being expected to rule out viable options for conversion and repurposing existing buildings in the proximity before they are able to construct new development.
- New approaches to building and retrofitting will be required.
- The Scottish Infrastructure Commission³⁷ has recommended utilising existing facilities and assets wherever possible. Promoting reuse of existing facilities could constrain the ability to direct development to new locations and a flexible approach will be required.

Other specific comments as to how any approach should be framed, and sometimes with particular reference to current SPP, included that:

- SPP should be updated to reference inclusive economic growth.
- Increasing the influence and improving integration of the SEA, while also streamlining the assessment approach so it is more integrated, responsive and up to date would help ensure positive contributions to sustainable development are better identified.
- The current sustainability criteria within SPP paragraph 54 are too imprecisely drafted to be used as criteria for assessing planning applications, although this is frequently what happens. They allow development where, for example,

³⁷ Further information is available from The Infrastructure Commission for Scotland’s website at: <https://infrastructurecommission.scot/>

there is an option of public transport or walking/cycling but where, in reality, that is very unlikely to form a significant proportion of journeys.

- Current SPP needs to be clarified as building in the green belt can be justified as supporting sustainable economic growth under current policy.
- Given the number and breath of principles included under Sustainability in current SPP, and the fact that some development proposals will not meet all of these, if these are to remain, NPF4 should clarify what weighting should be applied to each principle at the development management stage.

There was also a call for NPF4 to include a specific policy setting out the need for the highest standards of sustainable design and construction. This should outline general principles to improve the environmental performance of developments and should also require all developments to produce a sustainability statement to demonstrate how such issues have been considered. The Mayor of London's Plan was cited as containing a good practice example of a sustainable design and construction policy³⁸, and the supporting Sustainable Design and Construction Supplementary Guidance³⁹ as being well-regarded for promoting excellence in sustainable design standards.

Issues relating to the environmental performance of buildings are covered further at the *Climate change* theme.

Community engagement and empowerment

A number of respondents addressed the importance of community engagement, including that NPF4 should encourage and increase the opportunities for communities to be involved in and influence planning-related decisions. It was suggested that this approach could strengthen the relationship between the community and the local authority by developing partnerships and sharing power and decision-making.

In terms of who should be involved, comments included that it will be important to ensure that engagement is inclusive for all members of the public, including those who traditionally may be least likely to engage, but who are most likely to benefit from approaches to support quality of life, health and wellbeing. It was reported that many people living in poverty will not be able to take part in digital consultation and engagement, so thought needs to be given as to how to engage them.

For rural authorities, it was noted that digital infrastructure may be lacking in some rural locations and it will be important to ensure that some people are not disenfranchised as a result. It was also reported that certain age groups are not well-versed in using online platforms.

³⁸ Available at: <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-five-londons-response/poli-1>

³⁹ Available at: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance/sustainable-design-and>

Other comments included that:

- Community groups should be at the heart of community engagement.
- Young people and children must be involved, and the debate should be inclusive and intergenerational. It was suggested that planning authorities must engage with children and young people on relevant planning matters, such as those that concern the design and development of public and private places likely to be used by children and young people for play, recreation, leisure, assembly and study. Further, it was suggested that it should be the responsibility of the planning authority to make appropriate links with schools, youth councils, support groups (such as young carers), local representatives of the Scottish Youth Parliament and other childhood professionals.

In terms of the areas of the planning system where community engagement was seen as key, suggestions included:

- Developing LDPs, with ample opportunities to input into their development and revision.
- Developing LPPs.
- Setting targets for new homes and determining planning applications.
- Consultation on national infrastructure.

A specific area of activity highlighted was the emergency-focused community resilience groups that exist in parts of Scotland, and it was suggested that engagement between groups such as these and local authorities needs to be placed on a more formal basis. It was suggested that giving such community groups guaranteed access to appropriate local authority fora, as required under the Community Empowerment (Scotland) Act 2015, especially in terms of planning and flood risk management, would be empowering and help ensure more effective and efficient deployment of local authority and community assets during and after emergencies. It was recommended that the important role community groups have to play in the planning process be recognised formally within NPF4.

Co-creation and partnership working between individuals, communities and businesses in developing green networks was also highlighted, with involvement of all stakeholders in developing and delivering solutions reported to enable local priorities and solutions to be tied to wider outcomes and to support increased understanding and buy-in.

In terms of the type of approach that should be promoted or required, it was suggested that early engagement with organisations working with communities, for example via the Scottish Community Development Centre, could support the embedding of the National Standards for Community Engagement in NPF4. Other comments included that:

- It will be important to identify ways of streamlining access and understanding the wider range of expertise that exists to facilitate access. This includes public bodies, local authorities, and third-sector organisations.
- There could be opportunities to share best-practise and collaboration between communities when creating community-led LPP.

Suggestions regarding the type of approach which could or should be taken included:

- Taking an asset-based community development, co-production approach. It was proposed that the LPP process (covered further under the *Placemaking* theme) should provide a statutory framework for this to happen.
- Embracing and normalising mini-publics, participatory budgeting and digital innovations such as online forums.
- Citizen Assembly engagement, including on planning decisions.

It was suggested, however, that required approaches should not be too prescribed or specific, as different communities will engage in different ways and flexibility on how engagement is achieved should be given to the local authority.

It was also noted that community engagement work has resource and capacity issues for planning authorities and that communities with a high-level of engagement are often those who are individually well-resourced in terms of finance and time. Finding ways to engage those that have limited resources was suggested as a priority for NPF4.

Finally, it was suggested that relevant third sector organisations could play an impartial role in helping deliver the aims of NPF4, including through explaining planning processes, bringing different communities and stakeholders together, mediation, facilitating local communities to engage with their places, and promoting the involvement of young people and other seldom-heard groups.

Transport

Proposed key objective of NPF4: To ensure that new development supports delivery of the vision and priorities set out in the National Transport Strategy.

There was agreement that NPF4 should support NTS2 with a suggestion that this will help to integrate spatial and transport planning, informing investment decisions based on their alignment with NPF4, NTS2, RSSs and LDPs.

The need for regional co-ordination of transport infrastructure was also observed and it was suggested that LDPs and RSSs should be required to demonstrate how they reflect and help to achieve the aims and outcomes outlined in Scotland's seven Regional Transport Strategies. Increased devolution of decision making, budgeting and resourcing of strategic transport governance and operation to a regional and/or local level was proposed.

Points on the relationship between NPF4, NTS2 and STPR2 included:

- Identification of infrastructure requirements under NPF4 must be linked to STPR2 and the investment priorities that will be delivered through STPR2. The requirement for STPR2 to take account of local circumstances and needs was highlighted, with a specific suggestion that it should not overlook priorities outside the central belt.
- The wider area impacts of travel as a result of nationally significant city and region economic growth need to be recognised as requiring national, regional and local action in NPF4 as well as NTS2 and STPR2.

For NPF4, alignment with NTS2 was noted to require:

- A major shift in emphasis from roads and cars to walking, cycling and public transport.
- Large scale improvements to active and sustainable transport networks across Scotland. This was suggested as a National Development.

A clear policy framework as to how LDPs can achieve the lasting modal shift needed in terms of transport and travel, and how they can contribute to reducing carbon emissions from transport in their area was suggested.

There was a call for all new capital expenditure associated with improvements to transport to be zero-carbon and, particularly in the light of the economic effects of COVID-19, for priority for capital expenditure projects which have greater potential to be carried out by Scottish companies and Local Authorities.

Many transport-related projects were suggested to merit National Development status including bus or rail projects including High Speed Rail and various strategic transport network enhancements or corridors. In relation to active travel there were proposals for coastal paths and cycling and walking networks, including that NPF3's National Long Distance Cycling and Walking Network should continue as an NPF4 National Development.

New housing developments

Some respondents made points on the location and design of new developments including highlighting the need to reduce dependency on cars, calling for an end to car-dependent developments or calling for development of car-free neighbourhoods.

With respect to the criteria for sustainable development it was argued that new housing sites should:

- Be provided with safe walking and cycling routes. In light of the move towards quieter electric vehicles it was argued that clearly defined pavements are needed for pedestrian safety.
- Provide shared bikes and e-bikes funded through developer contributions.
- Have secure cycle parking facilities.
- Be well-connected to town centres. The potential of greater walking and cycling access to help rejuvenate town centres was also suggested.
- Have a road layout that is appealing to bus operators in terms of easy access to the main direction of travel, well-placed bus stops, turning bays etc.
- Maintain up-to-date travel plans to provide good quality advice covering active and public travel options to all new occupants of a development, not just when the development is new.

In terms of accessibility of new housing development to public transport, facilities and services it was argued that suggested walking distances set out in Planning Advice Note 75 are unrealistic for many people, leading to an increase in car use. It was suggested the standards should be tightened and become requirements so developers fund changes in bus services and provide local shops and services within developments.

It was also argued that accessibility to public transport should not be a binary test for sustainable housing development and it was suggested that paragraph 81 of the current SPP should be amended accordingly.

With respect to the current SPP requirement for planning permission not to be granted for significant travel-generating uses in certain circumstances, it was suggested clarity is needed on the thresholds for determining such significant travel-generating uses.

Although facilitating active travel and use of public transport were highlighted by many respondents, an ongoing requirement for cars and for electric vehicles was also suggested, along with the need for new developments to provide electric vehicle charging points. A national standard for such provision was suggested, with one proposal for a minimum of one charge point for five residential units. It was also argued that fast chargers should not be installed in residential areas, rather that smart charging and vehicle-to-grid should be required at houses.

With respect to provision of parking space in new developments it was suggested that:

- The default position that each household in a new development should have at least one parking space should be removed.
- Policies should encourage lower maximum parking standards in areas well served by public and active transport.
- Parking spaces should attract developer contributions to fund active travel infrastructure – additional spaces requiring additional contributions.
- Convenient parking spaces should be designated for car sharing schemes with private parking spaces located further away.
- Low car neighbourhoods could be marketed by the developer as part of a wider low carbon image.

However, it was also argued that all new properties should have a parking space, with two spaces for larger properties and additional space for visitor parking. Developments with under-provision for parking were reported to have vehicles parked on grass verges and on pavements.

In terms of where new development should be encouraged suggestions included: sustainable locations; sites within existing settlement boundaries; brownfield sites; and sites near public transport hubs. It was argued that development on greenfield sites near motorways should only be permitted after other options have been considered.

There was also a suggestion that encouraging development in sites where rail transport can be accessed would allow construction materials to be transported by rail freight.

Active travel

Many respondents commented on the need to prioritise or invest in active travel, sometimes observing the benefits physical activity can bring in terms of improved health and wellbeing. It was also noted that NPF4 has a role in achieving priorities from several other national policies and strategies including: the Active Scotland Delivery Plan; the 2030 Vision for Active Travel; and the Active Travel Strategy.

It was suggested that more must be done for people to see active travel as a practical alternative to road transport, especially in rural areas, and that there should be equality between active travel and vehicle travel within local authority transport budgets. Among other issues raised were that:

- Active travel routes should be part of wider green networks.
- Routes should be multi-use.
- Rights of way over road users should be considered.
- Local authorities should take on maintenance for all new active travel infrastructure built with Transport Scotland funding.

A requirement for LDPs to include active travel policies was advocated and that proposals that would improve and expand existing path networks, provide new connections to the existing path network, reprioritise existing road space and

develop new routes dedicated to walking and cycling and public transport should be identified.

It was also argued that local authorities require stronger powers to allow land to be assembled for the delivery of sustainable infrastructure and that presence of a route in an adopted LDP should be sufficient to demonstrate that the land is required to deliver on sustainable objectives. Other suggestions included incentivising rural landowners to allow off-the-road shared use paths to be built across their land and that local authorities should take responsibility for connecting paths where developers do not.

Walking

The need to put walking at the heart of urban planning and to create walkable environments that encourage active lifestyles was highlighted. The importance of safe walking routes was also emphasised, including the need to monitor condition and maintenance when levels of funding may be falling. Cars parked on pavements, cyclists using pavements and poor pavement maintenance were identified as important issues.

Cycling

Comments with respect to infrastructure for cycling included requirements for more segregated cycle paths, and improved cycle lanes, and also the need for people to feel safe while cycling. Making cycle routes central to development and easier to use was also identified as important, and adoption of Cycling UKs 2018 recommendations to the UK Government was suggested.

A requirement for secure cycle parking was also highlighted, including for cycle parking at stations. In existing settlements, providing permitted development rights for cycle sheds or storage containers below a specified size was proposed.

It was also suggested that more bike carriages should be available on trains and that bike transport should be facilitated on long distance bus routes. Other facilities suggested included access to showers and to cycle maintenance facilities.

It was also argued that creating wider networks that cross boundaries between masterplan areas is essential but can be difficult to achieve. Further development of the National Cycle Network producing longer-distance cycling options was highlighted as providing a potential boost for tourism as well as improved commuting opportunities.

Granting pedestrian and cyclist priority on all 'C' class and unclassified roads was also suggested. While vehicular traffic would still be able to use these roads driving would be slowed down to suit the speed of walker and cyclists.

Public transport

There were calls for public transport to be prioritised and to be better integrated including with respect to ticketing and with active travel options. A stronger emphasis on connectivity and multi-modality in policy wording was suggested.

It was also argued that:

- Public transport vehicles must be converted to renewable energy sources.
- Public transport should be free or low cost to encourage use.

- Additional park and ride facilities are required, and consideration should be given to preventing private bus operators abandoning park-and-ride routes if they are not immediately profitable. Creating small areas of parking at road junctions to act as bus interchanges was also suggested.

The importance of multi-modal transport hubs and encouraging multi-method travel were highlighted and it was suggested there should be investment in transport interchanges.

Rail services

Further investment in rail infrastructure was argued to be necessary, including for both additional electrification and increased capacity. The need for continued planning support for electrification work was also suggested: it was noted that while many aspects of development associated with electrification benefit from permitted development rights, some will need planning or other consents that the planning system should provide policy and process support at all levels.

There were calls for faster rail connections between urban areas and for increased capacity or other improvements on specific routes including: the East Coast main line; the Highland main line; the Far North Line; the West Highland Line; the Fife Circle; and to services between Inverness and Aberdeen and between Glasgow and Edinburgh.

Other suggestions included:

- Reinstatement of local branch lines and opening local stations.
- Promoting tram, light rail or guided bus services.
- Extension of Edinburgh's tram system to support expansion of West Edinburgh.
- Improved station capacity.
- A rail hub at Perth.
- High Speed Rail.
- Improved rail links to international ferry ports to reduce the need for freight transport by road and moving rail freight at night to increase capacity.

Bus services

The potential of buses to relieve congestion and to play a role in longer distance active transport journeys was highlighted and measures to reverse the decline in bus services and enhance public perception of bus travel were proposed. More bus-only routes were suggested on strategic corridors.

It was also suggested that there should be a focus on:

- Routes where there will be greatest impact, including for the most disadvantaged communities.
- Stronger regional bus networks, particularly serving smaller towns and rural areas.

Ferry services

It was argued that ferry services require substantial investment to improve performance, resilience and carbon footprint. A specific suggestion was for commuter and other fast ferry services across the Clyde, Forth, Tay and Moray Firths.

Roads

There were calls for improvements to the existing road network, including to address capacity constraints and to improve pedestrian routes, cycle routes and bus lanes. While some respondents suggested improvements for specific roads and trunk roads it was also argued that road building should stop, with the resulting cost savings diverted into maintaining existing roads and active travel infrastructure.

Other suggestions included:

- Regional transport fuel strategies to encourage local renewable energy generation for transport purposes. It was also proposed that transport authorities should be given powers to designate transport corridors according to their environmental status and to restrict the type of vehicles permitted to use them.
- A presumption in favour of renewable energy projects designed to produce fuel for local transport strategies.
- A presumption against new petrol or diesel filling stations.
- Environmental impact assessment for trunk roads, with remediation schemes implemented where necessary.

Cars

Measures to reduce or limit the use of cars were suggested to be necessary including that:

- There should be higher parking charges in city centres and charging for workplace parking should be implemented. Parking capacity in towns and cities should be reduced each year.
- Congestion charging should be the norm.
- There should be a 20mph speed limit in towns and cities.
- There should be incentives for car sharing.

Air transport

There were calls to implement measures to reduce travel by air including by stopping airport development.

However, investment in the Highlands and Islands airport network and in new sustainable aircraft design were also advocated, and good air links were argued to be vital for international connectivity and competitiveness. Electric aircraft were suggested likely to provide sustainable connectivity, particularly on short highlands and islands routes.

Water transport

It was observed that sea transport is less carbon intensive than other forms of transport and it was suggested that investment in port and harbour infrastructure should be supported. It was argued that improving congestion around ports can make sea freight more attractive and also that there is scope for greater connectivity with the rail network for freight transport.

The potential for moving freight on the canal network was also suggested.

Rural and island issues

Several respondents highlighted connectivity challenges for island and rural communities, and it was suggested NPF4 should reflect the support for provision of essential rural transport services set out in NTS2. An integrated approach to public transport where bus services connect with internal and external ferry and air services was argued to be essential and the possibility of fixed links – tunnels or bridges – was also raised.

Allowing sustainable development only in locations that can utilise active travel or public transport was argued to be more suited to urban areas than to islands with a scattered rural population. A more flexible approach that is responsive to the use of electric vehicles or other low/zero carbon travel was suggested as an alternative.

Equalities issues

It was suggested that, while the majority of public transport users are women, Scotland's current transport systems do not reflect the different needs of women, and that these should be taken into account as NTS2 is implemented.

There were additional suggestions that the transport planning system should take account of the needs of different types of travellers including: children and young people – particularly in relation to their need for independence in access to active travel and public transport; and disabled people. Participation of women, people from ethnic minority groups and disabled people in Transport Citizen Panels was suggested as an opportunity to inform the development of infrastructure in NPF4.

Homeworking and reduced travel

It was observed that COVID-19 has revealed that many people can work from home at least part-time, and it was argued that this should be encouraged in the longer term to reduce commuting. It was suggested this will affect not only how businesses think about their locations, but also where the workforce chooses to live and how they choose to travel, requiring a radical transformation in transport planning, modelling and funding.

The need to provide high-quality digital connections to support homeworking was highlighted and the scope for digital access to key services to reduce the need to travel was also noted.

Providing people with high-quality local green infrastructure that connects to a wider network, was also suggested to reduce the need to travel for recreation or to support walking and cycling holidays rather than motor-based touring.

Low carbon transport

The importance of decarbonising transport was noted with a suggestion that, to ensure appropriate infrastructure for the future, clear direction is needed nationally on whether investment should continue to be directed towards electric vehicles or if there should be a move to hydrogen. This was also argued to be important for freight operators looking to invest in switching their vehicles and it was suggested a long-term transport decarbonisation infrastructure roadmap, supported by clear policy direction would help provide confidence for fleet operators.

Electric vehicles

There were expectations that electric vehicles will become the norm and many references to need for a greatly increased charging network. There were suggestions that – in addition to the provisions in domestic settings noted above - there should be charging points in workplaces, new buildings, carparks (including as a condition of providing parking facilities) and along the road network including at new or modified filling stations. The requirement for charging facilities for e-bikes was also noted.

Specific points were made with reference to provision of charging points in rural areas, with existing gaps in charging infrastructure in the highlands and islands highlighted. A rural-first approach to roll-out of electric vehicle charging infrastructure (and/or hydrogen infrastructure in due course) was proposed.

The implications of increased demand on the capacity of the electricity network were noted and an Energy Company respondent highlighted the extent of the legislation with conditions that must be observed in relation to electrical infrastructure. It was suggested that introduction of greater flexibility in the consenting process and the exemption criteria could help to deliver a more positive and responsive planning framework. Further, it was proposed that current permitted development thresholds for electricity works in non-sensitive areas should be reviewed with a view to extending the threshold development limit.

Another Energy Company respondent noted their own involvement in trialling a model for delivering strategic infrastructure and argued that a framework of support for network operators to deliver roll out of electric vehicle charging will be necessary.

Hydrogen powered vehicles

A clear national policy supporting uses of hydrogen for purposes including as fuel for transport was suggested. The need to plan appropriate infrastructure for use of hydrogen for transport was noted and the roll-out of hydrogen refuelling stations was advocated.

Vacant and derelict land

Key objective of NPF4: To prioritise the use of vacant and derelict land so that viable development takes place on appropriate sites ahead of greenfield land as part of priorities to deliver inclusive growth and sustainable places and responding to the climate emergency.

The 2019 Act and NPF4 were seen as presenting a major opportunity to fundamentally rethink views and approaches to VDL, and to challenge the implicit assumption within public policy that if a site is too difficult or too challenging then it is acceptable to simply walk away.

In terms of the benefits that could flow from reusing brownfield sites, there was often a specific focus on tackling climate change, or more generally contributing to the Scottish Government's National Outcomes. Possible uses identified included:

- For renewable energy generation.
- Creating new parks or greenspaces or full naturalisation.
- For community growing, as new allotments or as city farms.
- Providing employment opportunities and attracting new investment.
- As sites for house building. It was also noted that increased urban densification can help with reducing transport-related carbon emissions.

In line with comments made in relation to housing supply, the value of bringing empty homes back into use was also highlighted, as was the potential for stimulating large-scale community renewal in some of Scotland's most deprived neighbourhoods, providing a catalyst for addressing long-standing health inequalities and a stimulus for inclusive growth. It was reported that the Vacant and Derelict Land Taskforce has clearly identified the persistent and problematic sites that are most harmful to surrounding local areas, but which have productive potential. There was also reference to the register compiled by the Scottish Land Commission.

There were calls for a stronger commitment to, or a national policy on, unlocking the potential of VDL. Looking ahead to 2050 it was argued that, in order to manage the development and use of land in the long-term public interest, a commitment to socially responsible land reuse needs to be embedded in the planning system so that it becomes unacceptable for surplus land to become derelict and prevent more sites from being used indefinitely.

There were also suggestions that tackling VDL should become a National Priority or that a programme of major scale is required to tackle the issue. Adopting a brownfield first policy and strengthening the level of presumption in favour of brownfield development was proposed along with suggestions that:

- Spatial strategies should consider a circular economy approach to site allocation or Land Use Strategies should encourage the use of brownfield before greenfield sites.

- There should be a national effort to co-ordinate and deliver priority sites and that this effort should be taken forward as a National Development.
- There should be a focus on supporting community groups, such as co-housing groups, to become developers of smaller sites.
- NPF4 should have a linked capital investment programme that supports the delivery of its ambitions and the national developments. This should include enhanced resources for VDL remediation for future development and green infrastructure. Encouraging a 'whole-life' approach, which considers factors such as the cost of enforcement and the long-term economic impact of failing to resolve issues, as well as the cost of resolving them, was proposed.
- Requiring planning authorities to prioritise the reuse of land based on the harm caused to communities and to work with communities to develop place-based plans to bring them back into use. It was reported that the Land Commission has produced a framework to help local authorities engage with communities and assess the harm caused by neglected land and buildings.

Specific suggestions in relation to taking any priority or policy forward included:

- Establishing clear national targets for the reuse of derelict land and include an outcome measuring the impact of land reuse.
- Introducing policy and mechanisms, such as Compulsory Sales Orders, or Community Right to Buy that would enable regeneration and prevent sites from being abandoned.
- Strengthening SPP to prioritise stuck sites, including by mitigating the risk to planning authorities that prioritise brownfield development of losing much needed investment to neighbouring areas. It was suggested that care will be required to design policy that supports rather than deters investment, but that overseas experience suggests this is an achievable aspiration.
- Repositioning the VDL Register, for example by differentiating between recently vacant, deeply challenging and slowly naturalising sites and by including VDL data on a digital mapping tool.

Along with whole system comments and suggestions, a number of the National Development proposals involved the re-use of brownfield sites or other VDL, including large sites connected with the decommissioning of power stations or the closure of large industrial facilities. They also included proposals that current National Developments (under NPF3) which involve the use of VDL, such as Ravenscraig and the Grangemouth Investment Zone, should continue.

National Development proposals often involved the use of VDL to create new business and employment opportunities, often connected to the green economy and sustainable energy, for housing development, for the creation of active travel and green infrastructure and for the creation of greenspaces.

Housing Technical Discussion Paper

The Housing Technical Discussion Paper⁴⁰ (the Discussion Paper) sets out the Scottish Government's current thinking on the methodology that could be used for setting 'targets for the use of land for housing in different areas of Scotland' as required in NPF4 by the Planning (Scotland) Act 2019. It has been prepared to inform early discussions with stakeholders on implementation of the 2019 Act and NPF4.

Around 25 respondents, including a number of Local Authority respondents, made a direct response to the Discussion Paper. Other respondents made relevant comments under the housing-related themes or questions and their views are also included in the analysis presented below.

A small number of highly detailed responses raised issues, including relating to calculating the allowances necessary to satisfy paragraph 100 of SPP (which advises that development plans should identify a generous supply of housing land sufficient to maintain a minimum five-year effective land supply at all times). Please note that the relevant Scottish Government policy team has access to all original responses.

Broader themes

In addition to answering the specific questions posed, some respondents made broader comments on housing land and delivery or the Discussion Paper. Some of the issues raised are covered in greater depth under the *Housing – general* and *Housing - affordable* themes.

It was seen as unclear how this Call for Ideas process relates to the recent Housing to 2040 consultation, with the hope expressed that the outcome of both consultations will result in a more joined up approach. It was suggested that the ambitions of Housing to 2040 and the potential shift in models of housing provision and delivery, and potential funding mechanisms are all relevant to this exercise. 'Homes' also need to be recognised as an interconnected part of a 'local system' of place, affordability, quality of life, and health and wellbeing.

The importance of making connections and aligning with other strategic processes was also highlighted, with national and regional transport plans and strategic transport projects cited as examples. The need to deliver housing in the most sustainable way possible was identified as an increasing requirement and it was suggested that the overall approach to land for housing must take account of wider objectives of addressing climate change, making the best use of land as a resource, and maximising existing infrastructure investment.

There was also a suggestion that, particularly given the need to agree housing land figures, the preparation of NPF4 requires LDPs and LHSs to become better aligned with the NPF4 timetable and a mechanism will be required to allow this to happen. It was suggested that the current outline suggests that all LDPs will need to be prepared in a window after the adoption of NPF but that, while there could be clear benefits to

⁴⁰ Available at: <https://www.transformingplanning.scot/media/1296/national-planning-framework-4-housing-land-targets-technical-discussion-paper-2-march-2020.pdf>

this, there are massive resource implications for all the key agencies, public sector bodies and other groups involved.

A concern was raised that the Discussion Paper focuses on housing 'numbers' and does not recognise the relationship between the planning system and the role of HMPs in addressing wider issues impacting on housing delivery.

There were differing perspectives on the key drivers of completion rates in Scotland over recent years. On the one hand, it was suggested that there is no evidence establishing a link between planning policy and completion rates. Rather, developer activity tends to be cyclical and is closely aligned to the performance of the economy and to wider social and housing policy changes.

An alternative perspective was that the housing market in Scotland is not functioning properly due to years of constrained supply reflecting a failure to plan for the right homes in the right places to meet housing needs and requirements. It was suggested that this creates a lack of choice and is one of the main reasons the market fails to function.

Other issues raised often reflected those covered in greater detail under the *Housing - general* and *Housing - affordable* themes but in summary included that:

- Certainty of funding and resources is needed over a longer period to provide a stable delivery pipeline and consistent standards. This would provide the ability to set deliverable targets over which the public sector has direct influence and control, and which could usefully be included in NPF4.
- The economic, environmental, social and geographic impacts of COVID-19 will have implications for delivery of homes in Scotland for at least the short to medium term, but most likely into the long term when taking account of the impact on local businesses, supply chain, available finance, availability of workforce etc. These impacts should be factored into the methodology where possible.
- Attention needs to be paid to the terminology being used: a number of terms - figures, requirements, housing land targets, flexibility - are used without clarity. Estimates, requirements, generosity and targets are some of the terms in current usage and practitioners have established a better understanding of how and when these terms are used.

Finally, it was also suggested that, whilst the comments in the Discussion Paper regarding the importance of local input are welcome, the proposals are being interpreted by many local authorities as a centralisation of an activity over which the authorities would wish to retain direct influence.

What is your view on the guiding principles set out?

The Discussion Paper sets out a number of guiding principles that could form part of the process for setting targets for the use of land for housing.

Some respondents offered a degree of broad support for the guiding principles, for example as providing a useful frame of reference. Other respondents made a general

statement that they did not support the guiding principles or, for example, that most of the guiding principles are reasonable in theory but may have some problems working in practice.

There was also a suggestion that another guiding principle should be added. This was:

Engagement with communities, key agencies, stakeholders and developers will be important nationally and locally. Infrastructure providers and the development industry could positively contribute to this work and in particular bring their expertise to developing delivery programmes to achieve the ambitions of NPF.

The approach to setting national housing land figures is intended to provide early clarity and to reduce conflict and complexity in the local development plan process.

There was support for moving in principle towards an approach which will reduce debate around housing land calculations and reduce conflict and complexity. However, some respondents were concerned that the proposed approach will not deliver against that aim.

One issue raised (discussed further below) was the potential for double examination of housing numbers, and there was a request for clarity on what will be examined at gatecheck and examination phases. There were concerns that it will introduce more opportunities for conflict in the process: it was suggested that at present there may be conflict at the examination of the LDP or SDP, but that this could be extended to the Draft and Final NPF stages, the gatecheck stage and the LDP examination stage.

It was also suggested that there should be a consistent, universal method endorsed by the Scottish Government, on how housing targets are to be set and the evidence on which the final figure is to be based. There was a view that applying an entirely consistent approach across every planning authority, and for this to be transparent and open to comment at an early stage, would instil confidence in the process and reduce the potential for conflict at later stages. To this end, it was seen as important for the process to be accessible and fully open to scrutiny while in a format that enables ease of comparison, assessment and comment across areas.

The purpose of the figures is to ensure that local development plans allocate sufficient land for housing. We propose that the figures in NPF4 are expressed as minimum figures for housing land to accommodate an agreed projected number of homes.

Some respondents stated their disagreement with this principle, or that they agreed only in principle, with reasons given including that:

- It is impossible to state the quantum of land required without first assessing the number of homes required.
- The process should be outcome focused and any land identified as a result of a housing land requirement figure must be presented in the context of being necessary to meet a housing supply target.

- A minimum target will be open to interpretation and will increase opportunities for debate and conflict.

There was a query, as at other questions, as to whether the reference to housing land is to area or in unit numbers.

In relation to minimum figures for housing it was suggested that:

- These are inappropriate in areas of high demand where some planning restraint is required to avoid adverse effects on infrastructure and environmental issues.
- Setting minimum figures in places where demand is low or even non-existent is irrelevant.

It was also suggested that there would need to be a mechanism which establishes what a maximum figure is since the absence of an upper limit could lead to other pressures, such as on infrastructure provision, environmental limits and capacity of public services, which also need to be factored in.

An agreed proportion of this land should be 'deliverable' whilst the remainder should reflect the longer-term spatial strategy for the area. The policy and / or guidance could provide clarity on what is expected to be deliverable land, as well as addressing longer term strategy.

A number of comments focused on what is meant by this guiding principle, including that:

- It is not clear what 'an agreed proportion' means in practical terms, and how this would be measured and established.
- Nor is it clear with whom agreement will be required.
- Nor what is meant by 'deliverable' in this context. The issue of deliverability is discussed further below at the questions on the approach.

Other comments, both under this guiding principle and at the next, considered the most effective or meaningful unit or measure for land. Approaches with which respondents did not agree included those based on:

- Completion or delivery rates.
- The programmed output. It was suggested that this has caused some of the problems with the current system with the five-year programme of completions being used as the measure of supply of land.

In terms of how respondents thought land should be 'described' or measured, suggestions included:

- As a proportion of the land being free of development constraints with a programme in place to remove any constraints on the remaining land by a specific time.
- There should be minimum housing delivery figures and not just minimum figures for identifying land on paper.

While there was support for the principle of focusing on deliverable rather than effective land, some respondents stated their disagreement with this principle, with reasons given including that identifying deliverable land should not be used as a reason to reject other sustainable and deliverable home building opportunities if it cannot be demonstrated that the identified land is free of barriers (market or otherwise) to the delivery of homes through the preferred method.

In terms of approaches going forward, suggestions included:

- There should be a clear plan of action within each LDP to show that every site is, or will go through defined steps to become, deliverable.
- Ensuring there is no contradiction with the guiding principles of “Housing to 2040”, which clearly explains the Scottish Government’s position on moving away from banking land and property.

There was also reference to longer-term plans that are in place in other parts of the UK and to the lessons learned and areas of best practice which have been established elsewhere. It was reported that the National Planning Policy Framework in England contains wording in relation to the identification of a supply of land for new homes which could provide a useful basis upon which to plan for five years’ effective supply with flexibility thereafter. Based on this, suggested wording for NPF4 terminology was:

- Specific, effective sites for years one to five of the plan period.
- Specific, established sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

In terms of geography and scale, we propose that the minimum figures should be set for all local authority areas in Scotland. This would maximise consistency and simplicity in the planning system as a whole and remove the uncertainty that could arise if, for example, figures at a regional scale required further calculations to set out local contributions to a shared figure. Within this, however, we recognise that there is a need to allow for local flexibility that reflects local circumstances. This could still be achieved as the figures are taken forward in each local development plan.

While some respondents agreed with the principle of setting minimum figures for all local authority areas in Scotland, others did not agree with the local authority level approach, including because it could result in unsustainable development and the undermining of spatial and regeneration priorities.

It was also suggested that setting a minimum housing land figure is inappropriate in areas where:

- High market demand means measures to restrain new housing need to be introduced to respect infrastructure constraints and environmental issues.
- It is low demand that is preventing development and therefore completion rates.

These concerns led to a call for local authorities to be involved directly in the determination of any levels of flexibility to establish the minimum housing land figures.

Other comments addressed the geographies for a minimum housing land figure. They included that the areas should correspond with the operational area of each LDP. It was suggested that, in some areas at least, there is no basis or rationale for the setting of a figure at a regional level. Further, it was reported that for the first round of indicative RSSs and timelines to feed into NPF4 it may be impractical for those outwith former SDP areas to work together to alter HMAs. However, as above, there was also a question as to whether local authorities represent the best geography or whether an RSS-wide target would be more relevant.

Alternative geographies proposed included at the city region/functional HMA to better reflect the way that housing demand occurs and the role of new housing in delivering spatial priorities such as brownfield land regeneration.

The impact of tenure was also noted, including that while functional HMAs reflect wider areas within which private market buyers may wish to purchase a new home, local authority geographies better reflect the social sector, evidently so in the case of council home provision. It was suggested that these distinctions should be retained within the process. It was also suggested that targets for both private and affordable housing tenures should be set at a national level with input from the relevant stakeholder, including local authorities at that point.

A national approach needs to be informed by regional and local knowledge, analysis and input. We therefore propose to define the requirements for land in each area by working with local and planning authorities individually and / or in regional collaborations to ensure national analysis is informed by local objectives.

Comments included that the opportunity for the input of regional and local knowledge and analysis is welcomed and will be crucial in ensuring that the targets in the NPF are realistic and result in the delivery of high-quality homes in the right locations. Other comments included that:

- It is unclear how this could be achieved and at what point regional and local knowledge would play a part.
- While a national approach requires support at the regional and local level, this should not be to the detriment of meeting Scotland's housing need and demand.
- This is a missed opportunity for true collaboration, across the current public-private divide.

There was also a concern that it will be difficult for local authorities and other stakeholders to conduct the required research and provide robust evidence in time to influence NPF 4 land requirements.

With reference to stakeholders, it was noted that the requirement for stakeholders, such as Homes for Scotland, to agree to any changes could mean that this stage will require significant time and reaching agreement may be difficult. It was reported that there are no other areas of planning that involve a primarily private sector industry body such as Homes for Scotland to such a degree, and a number of local authority or city region respondents reported that they would be concerned if Homes for Scotland

were to be granted a potential veto role in agreeing the scenarios and assumptions and any potential approach to functional HMAs. There was also a query as to whether authorities would be able to progress with a disputed position should an agreement not be reached with all parties or whether the Scottish Government would put mediation measures in place to allow targets to be set.

In terms of how the approach should be taken forward, other suggestions or comments included:

- As this matter has previously been the preserve of the local authorities, it may require to be considered by local authority representative bodies such as SOLACE and COSLA.
- Collaboration should not be limited to local and planning authorities but should involve other key cross-sector stakeholders.
- Locally based HNDAs should be prepared jointly by local authorities and the CHMA. This would require funding and concise programming.
- It will be important that sufficient time is given to local authorities to feed into this process, as any alternative scenarios and assumptions will require the local authority to develop a robust evidence base. Time requirements for going through the governance and approval processes within local authorities were also highlighted.

Should NPF contain housing land figures for all areas in Scotland or focus on certain areas?

Respondents who addressed this question directly generally thought that NPF should contain figures for all areas, including if NPF is to live up to its title as a national framework. As above, there was also a view that NPF4 must set an over-arching ambitious housing target for Scotland.

A concern raised was that the Discussion Paper appears to suggest that more land may be required in certain high demand areas because of previous undersupply and that this may come at the expense of areas of low demand. It was suggested that areas of low demand are equally important, if not more so, as a means of evening out spatially the pressures of development and encouraging new life in places able to accommodate additional homes. It was also noted that it has not been specified whether 'areas' refers to geographic areas or different sectors.

However, it was also suggested that, as the requirement for housing land varies from area to area, there is a need for NPF4 to focus on certain areas and have the flexibility to apply evidence to support requirements at a local level. It was also argued that locational factors must be considered, particularly between areas of high and low demand, and that minimum figures for housing are inappropriate in areas of high market and commercial demand where some planning constraints are required.

A further comment was that, if the NPF were to only focus on certain areas, then this could most usefully be done for the former city regions in determining cross-boundary housing market areas and then apportioning the target between the different authorities.

Are there areas in Scotland where an alternative approach may be more appropriate?

Comments at this question tended to be brief, with most of those who answered suggesting that an alternative approach is not likely to be required or would not be required for their area. Further comments included that there is no obvious reason why any part of mainland Scotland should need to vary a standard national approach.

However, not all respondents agreed, including because of a view that local knowledge and experience of the housing market should be a key principle of determining housing need and its location.

It was also suggested that, to avoid urban sprawl, a separate approach should be considered for rural areas and the edges of cities, particularly in areas where infrastructure is not suitable for large scale expansion.

What is your view on the proposed approach to setting out requirements for housing land?

A number of respondents stated that, overall, they could not support or did not agree with the proposed approach. This included because of an understanding that if the NPF4 HNDA is run as it is currently anticipated, it will produce a Scottish annual all tenure housing target of approximately 13,434 homes. In contrast, it was suggested that the evidence points to 25,000 homes a year being an appropriate minimum target for Scotland.

Other wider concerns raised included that:

- Given the intention to remove from local authorities the possibility of preparing their own, albeit flawed HNDA based on local knowledge and allowing for flexibility, the proposed approach would result in more confusion and disagreement than the current method.
- It removes the requirement from current SPP to take account of wider economic factors such as capacity, resource and deliverability.
- It assumes that local authorities *should* aim to provide land for enough new homes to account for the projected increase in new households and for households currently in need.

Timescales

Other comments raised issues related to timescales, including that:

- The Discussion Paper does not address base dates for the calculation of targets in LDPs. It is not clear whether the base date would be the date of publication of NPF4, the adoption date of the LDP, or the base date of the HNDA/household projections.
- The issue of timescales and synchronising NPF4, the LHS and the LDP cycles is not properly addressed. Synchronising LDP and LHS locally has been problematic, and this is going to get even more difficult with NPF4 becoming part of the process.

- It is unclear over what period the housing land target would be set, and for what period detailed allocations would be made.

There was also a query about the timescales associated with the Scottish Government undertaking steps 1 and 2 of the HNDA tool (discussed further below). The timescale-associated concern was whether the CHMA will have the capacity to undertake this modelling for the whole of Scotland in the time available and that, depending on the dates of a local authority's LDP, there could also be a significant timing lag between the running of steps 1 and 2 of the HNDA tool by the CHMA and the running of the remaining steps of the tool by the local authority. It was suggested that this could then bring the reliability of the data and HNDA results into question.

On the updating of data between draft and revised drafts of NPF, experience was reported to suggest this could have significant implications for the end results. There was a query as to what would happen if planning authorities have already started working on their 'local' HNDA to drill down to HMA level for LDPs, or whether this work would have to wait until NPF4 is finalised?

As under other themes, it was suggested that a means of aligning the LDP, LHS and NPF4 will need to be developed in order to avoid conflict at the gatecheck and examination stages, particularly if any of these stages should take place a great time after the publication of NPF.

How 'land' and outputs should be defined

The question was raised as to whether consideration has been given to moving away from a targets-based system, looking at a more informed and rational approach to planning for housing and communities? In this context it was seen as vital that planning retains a focus on delivery, infrastructure, design and the creation of great places for people.

Other comments addressed whether NPF4 should be focused on delivery rather than amount of land and should set out targets rather than (downgrading to) figures. In terms of focusing on delivery rather than land, it was suggested that land availability is not the main/only barrier to increasing housing delivery; there are barriers to the delivery of many sites allocated in plans and/or identified in audits.

Supporting arguments made in relation to setting targets included that this is a clear requirement under the 2019 Act. It was also suggested that the amount of undeliverable land serves as a barrier to the release of alternative, deliverable development opportunities and this will perpetuate if NPF4 housing targets are not set for delivery of new homes.

A number of respondents commented on, or raised queries about, how the 'targets for the use of land for housing' would be defined and presented. One suggestion was that the housing land target should be expressed in housing units but that the Discussion Paper gives the impression that it will be expressed as a land area. Reflecting wider calls for clarity around use of terms, there was a question as to what is meant by 'housing land figures' i.e. whether it refers to a housing land requirement, the housing supply target, or the assessment of housing need and demand from the HNDA tool?

Similar issues around meaning and use of language were also raised around LDPs moving to a ten-year timeframe (covered at the final question below).

Deliverability, resources and infrastructure

Issues raised included that while the Discussion Paper states that an agreed proportion of housing to meet the target should be deliverable, it is unclear what 'deliverable' means, to what period deliverability would relate, who 'agrees' the proportion, and when this would be decided. In terms of a planning authority's role, it was reported as being to assist in facilitating delivery and, where possible, allocating sites that are deliverable. However, it was also noted that influencing timing and rate of building is limited within the LDP and Development Management process. Other comments included that:

- All land is deliverable given the right circumstances.
- Experience has shown that in some locations almost no land is deliverable due to market circumstances.
- Delivery of public sector housing is dependent almost exclusively on the availability of public investment.
- Planning authorities have relatively little control over delivery of private sector homes which is the responsibility of housebuilders and developers in the main.
- At no point in the proposed method for setting housing land figures are available and future infrastructure requirements considered.

The issues raised sometimes culminated in a call for a careful definition of the term 'deliverable' and for:

- Identification of barriers to development and possible means of supporting delivery to be a key outcome.
- The link between deliverability and infrastructure provision to be recognised.

In relation to how the performance of planning authorities in maintaining an adequate land supply should be judged, it was suggested that:

- It should not be based on past delivery or future programming which are dependent on the housebuilding industry, or on wider economic factors.
- Where genuine shortfalls do occur, a more plan-led approach is needed to enable the right sites to come forward, rather than the plan being considered out of date.
- Authorities could specify broad areas or settlements where there is available infrastructure or identify key criteria to be met. It must also be clear that any additional sites will actually be capable of increasing build rates and addressing any shortfall in a reasonable timescale.

Tenure

Views were mixed on whether NPF should set an all tenure figure. Those supporting this approach commented that it is important that HMPs take on a clear role in planning for housing and that would include on tenure-based requirements. An

alternative perspective was that whilst a tenure split is needed for LHS purposes, it is questionable whether there is any point defining this within the LDP as the split does not influence actual planning decisions.

However, others were looking for NPF to set out a tenure-based breakdown, sometimes described as a breakdown between private and affordable housing. Reasons given included that predicting land required does not consider sufficiently the potential that the level of affordable housing need may be higher than the market could support. There was an associated concern that this could lead to an over-supply of land in areas where there is insufficient resource or capacity to deliver all of the identified need for affordable housing. It was also noted that the COVID-19 pandemic means that there are now many unknowns in terms of capacity, resources and deliverability and that the need for affordable housing is only likely to rise.

Role of the HNDA Tool

Concerns sometimes focused on the appropriateness and efficacy of the HNDA process (discussed further below). In summary, they included that using the HNDA Tool could result in an annual housing target of fewer than 15,000 homes, significantly below both current delivery levels and the number of new homes that are shown to be required by the best available independent evidence.

Scenarios and assumptions

It was considered essential that factors beyond demographic projections are taken into account. but it was suggested that it is not clear how this is to be factored into the process.

Further comments included that:

- The phrase 'invitation to local authorities' to contribute to scenario and assumption choices' is of concern. Local authorities and the wider HMP should not be invited but seen as key partners in the setting of any housing land target/requirements that affect their area.
- Robust and credible evidence would be required to justify alternative scenarios and the proposal is clear that agreement with stakeholders would be required. Such a process would be similar to the current situation of local authorities conducting their own HNDA which is a high resource and time-consuming undertaking.
- It would be difficult to get agreement for alternative targets from a range of stakeholders with conflicting priorities for housing targets.
- It would be helpful not to call the consideration of alternative projections 'scenarios' as this has a distinct meaning in a later stage of the HNDA model.
- Housing land completions, based on local authority HLAs, should inform the minimum housing land figure. It is important to consider that for 'flexibility' to be informed by recent completions, the average completions over a particular period will reflect prevailing market conditions, the development plan strategy in force at that time, and the availability or otherwise of an effective five year land supply (under current provisions). The implications of whether completions have

come from allocated or windfall sites should also be considered, and the share indicated.

It was also suggested that in areas where functional housing markets cross local authority boundaries, and the submission of alternative assumptions and scenarios would be necessary, the proposed mechanism and timescale for input to the preparation of the NPF may not be achievable. Given this, it was requested that specific consideration be given to the opportunity to submit local area alternatives at any time including between the draft and revised draft NPF4.

Finally, a concern was raised with respect to local authorities' ability to consider the requirement and propose alternative scenarios and assumptions and it was reported that there are no details provided of how this will be independently scrutinised.

Role of/impact on communities

Respondents also raised issues around local communities, including that the environmental, social and economic policy factors and the spatial implications for communities of targets must be taken into account. This should include allowing for adequate and comprehensive processes for engagement with communities and their representatives to ensure an understanding of NPF and to build trust in the planning system.

Also from a communities' perspective, the recommendations of the Scottish Government's 2019 HLA research⁴¹ were noted, including that the process for preparing HLAs, and their form and content, should be standardised across Scotland, with clear guidance provided. It was suggested that communities who feel they are impacted by the development of new homes on sites allocated in the LDP will want to understand how numbers for new homes have been assessed and that an easy-read guide to both the HLA and HNDA processes would be beneficial.

Rural and island communities

It was suggested that the proposed approach does not adequately reflect the rural dimension, including the needs of island communities. Specific concerns included that:

- There is no reference to housing land to enable rural repopulation, despite this being a high-level outcome of NPF4, and that an alternative approach to setting targets for land will be required, particularly to address the lack of affordable housing opportunities.
- It does not consider whether the proposed approach will have a different effect within island communities.

Should NPF provide a single housing land figure or a range?

Views were mixed, with some respondents noting both pros and cons to providing a single figure or a range. Advantages associated with a single figure, including those

⁴¹ Housing land audits: research project. Available at: <https://www.gov.scot/publications/research-project-housing-land-audits-january-2019/>

identified by respondents who supported this approach, included that it would result in a clearly defined housing target that would be subject to minimal debate at the development plan gatecheck and examination, thus easing the development plan preparation process.

While preferring a single figure, support was sometimes caveated by the requirement for that single figure to be based on local knowledge and expertise. One local authority respondent noted that they would only support this approach if the relevant environmental, social and economic factors, including infrastructure constraints, have been taken into account and there has been significant input by local authorities and local communities. Should this not be the case, they felt that a well-informed and realistic housing land target range would be more appropriate, and that this would allow the local authority to consider these matters.

Advantages associated with providing a range, including those identified by respondents who supported this approach, included that it offers a greater level of flexibility for changing circumstances.

Disadvantages or possible tensions identified in relation to providing a range included that:

- Where ranges are set there is a tendency for the bottom (or easier) reaches of the range to be selected. It was seen as representing a risk that local authorities would plan to meet their minimum target.
- The development industry is likely to push for the land allocations to meet the higher end of the range and communities are more likely to want the lower end with the planning authority having to justify its position either way.

Finally, it was noted that this question is assumed to refer to a single figure or range being provided for a single local authority area.

Is the HNDA Tool an appropriate mechanism to base housing land figures on?

There was some support for using the HNDA Tool to provide a baseline to start the process of setting housing land supply targets, albeit the importance of considering any outputs against local environmental, social and economic factors was again stressed. It was suggested that the HNDA outputs are a useful starting point only.

Factors seen as supporting the use of the HNDA Tool included that:

- The LHS process is not currently subject to change and housing targets within LHSs will continue to be underpinned by HNDAs. SPP requires LDPs and LHSs to be aligned as much as possible.
- The HNDA process has brought added value to the collective understanding of housing systems within HMPs and this should not be lost within any new system of planning for housing.

It was also reported that the HNDA process has brought added value to the collective understanding of housing systems between housing and planning professionals

working within HMPs and seen as important that this is not lost within any new system of planning for housing.

Those who offered some support for the Tool having a role, along with those who did not or only raised concerns, highlighted a range of issues they saw as affecting its usefulness and/or the validity of its outputs.

There was a view that running the initial numbers using the HNDA Tool is a relatively simple part of the process, and whilst it can be done at the national level, it does not particularly save time or effort to do so.

Population projections

Comments about the population projection figures used to populate the HNDA Tool included that:

- They are limited by the use of self-perpetuating, trend-based projections.
- The default in the HNDA Tool does not align with the household projection change as set out in NRS projections. Instead, it allows the user to capture household change from the base year of the model's run. It therefore potentially can lose the household projection change from the base date of the NRS household projections. The HNDA Practitioners Guide provides essential clarity that future household formation from NRS projections has to be met through the provision of additional housing units. The HNDA Tool therefore will require modification to ensure that the base date of the NRS household projections, be it 2016, 2018 or 2020, is adopted for the housing land figures.
- The current COVID-19 crisis largely invalidates the 2016 trend-based projections as a reasonable estimate of future demographic need when the need for affordable housing against market housing is taken into account.

It was suggested that HNDAs rely heavily on historic, secondary data showing household formation trends, meaning that where households have not been forming quickly in the past (perhaps due to affordability issues) will be reflected in the HNDA outputs.

There was also a view that an objective assessment of housing need based on sustainable economic growth ambitions, rather than just past trends of household projections, is a more robust method for setting housing needs, particularly over a ten-year period. It was suggested that a more rounded approach than is afforded by a standardised methodology is needed to avoid setting housing numbers that exacerbate existing negative trends rather than focusing on the potential for sustainable growth.

HoTOC⁴²

There was a concern that the HoTOC method may significantly underestimate those households who are homeless as well as those that are overcrowded and concealed.

⁴² HoTOC is the proxy method built into the HNDA Tool which is a count of homeless households in temporary accommodation and households who are both overcrowded and concealed.

With reference to the use of HoTOC for the calculation of existing need across Scotland, it was reported that the CHMA has advised in the past that the HNDA toolkit data and scenarios are only relevant for a maximum of five years. One concern raised was that the existing need count is likely to under-estimate housing need using the proposed indicators of homeless households, overcrowded households and concealed households.

It was also suggested that HoTOC works to a strict definition of what a household is, which means that those who might wish to form a household, such as young single adults living with parents but who want their own home, are excluded. Those living in homes that are physically unfit or households in homes that are not affordable to them were also identified as being excluded.

A range of additional data sources that could be used to establish the existing need count (as identified in a 2018 report for Crisis⁴³) were highlighted, including:

- Concealed/sharing households as a percentage of all households.
- Backlog housing needs – percentage of all households with one or more of affordability problems, overcrowding, concealed, sharing or unsuitable housing.
- Core homelessness – the number of households estimated to be rough sleeping or in similar situations, or in hostels, unsuitable temporary accommodation or sofa-surfing.
- Wider homelessness - households who are statutorily homeless but not in the 'core' group above, plus other households at significant risk of falling into homelessness in the coming year.
- Annual net new need for affordable housing - the number of households newly forming, plus half of net migrant households to the area, who are unable to afford market rent, less the annual flow of relets of social housing (excluding transfers).
- Chances of rehousing - the annual flow of lettings of social housing to new tenants as a percentage of the backlog housing need.

The potential impact of the Rapid Rehousing work going on across Scotland was also highlighted, with one local authority respondent reporting that they are looking into innovative alternative models to tackling homelessness. They noted that this work will affect the backlog of existing need on which scenarios are based, and that the toolkit scenarios need to consider the impact of Rapid Rehousing and Housing First.

Other data range limitations

In terms of other limitations of the HNDA Tool and the figures that it would produce, comments included that:

- The range of data used in the HNDA Tool is limited as the needs for specialist /adapted housing will not be counted.

⁴³ Housing supply requirements across Great Britain: for low-income households and homeless people. Available at: <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/housing-models-and-access/housing-supply-requirements-across-great-britain-2018/>

- Local authorities would want to reflect housing needs arising from size/type/ locational pressures which would not be reflected in a count of need at local authority level through the HNDA tool.

It was reported that local authorities have good quality local data to triangulate with national datasets.

Local applicability and adaptability

It was noted that, given that there will be limited scope for adjusting figures locally in the development plan, the figures need to accurately reflect local circumstances. However, one local authority reported their past experience that the HNDA is an imperfect tool which produces results that are unreliable, and which do not reflect local knowledge or actual local conditions. This respondent considered that a new approach to housing supply should be taken but that, in the interim, the Council-based process of preparing HNDAs should be examined independently and that the CHMA should be commissioned to explore whether, on the basis of that independent assessment, the HNDA tool and process can be improved or if it should be replaced by a more effective mechanism.

It was also suggested that the Tool is not dynamic and provides no opportunity for updating mid cycle. It was reported that under current arrangements for assessing the effectiveness of the land supply, the supply side is updated annually through HLA processes but the demand side is only updated every five years through the incorporation of the updated HNDA within the development plan. This means that supply is never being compared to an up-to-date assessment of demand and it was suggested that both elements of the equation should be updated on the same cycle.

Rural communities

In line with the general concerns expressed about the appropriateness of the approach to rural and island communities, it was suggested that current methodologies for HNDAs do not operate at sufficient detail to identify pockets of deprivation and housing need within rural areas, including in relation to homelessness and concealed households. It was also reported that HNDAs entrench past trends reinforcing depopulation.

Going forward

Some respondents highlighted issues to be borne in mind if the HNDA Tool is to be used. These included that:

- It is important that the most up-to-date household projections are used for this stage of the process. (New household projections are due in July 2020).
- It may be more helpful for NPF4 to express its target for housing land as an estimate based on steps 1 and 2 of the HNDA which local authorities then use to produce detailed local area-based targets for housing delivery.

In terms of suggested alternative approaches, proposals included carrying out primary research in the form of household surveys, with the information gathered used alongside other information sources to estimate the number of households and aspirant households.

As above, there was also reference to a range of additional data sources that could be used to establish the existing need count, as set out in the 2018 Crisis report.

Should there be scope for local and planning authorities working together to reflect functional housing market areas that cross local authority boundaries? What approaches could be used to achieve this?

One perspective was that local and planning authorities working together makes sense, or that it is imperative that local and planning authorities are able to continue working together to determine housing needs at a cross-boundary level. The Glasgow City Region was cited as an area within which demand for housing is extremely integrated across the area, with local authority boundaries largely arbitrary.

On a similar theme, it was noted that the former city regions already have mechanisms in place for working together although, given that these regional groupings will presumably be voluntary, there was a query as to what would happen in the event that a functional HMA boundary is identified which crosses local authority boundaries but no agreement is reached between those authorities to work together.

Further comments included that NPF must be able to consider functional housing markets and submarkets not only in terms of establishing demand but also in determining suitable locations for housing development in line with regional spatial priorities. It was suggested that such an approach would require the establishment of a regional body with a robust decision-making process, associated oversight and with the collaboration of all relevant local authorities. However, there were also concerns about whether the timescales for NPF4 processes will make it difficult to establish targets at functional market area level.

It was suggested that, where local authorities cannot meet their full minimum housing land requirement within the Council boundary, there must be a duty to co-operate with neighbouring authorities to redistribute the housing requirement.

Other comments on how any approach should be framed included that:

- It would need to be accompanied by clear information on how each authority would retain its own responsibility for achieving the delivery of sufficient new homes to meet the requirements.
- NPF processes must allow sufficient time to allow cross-boundary work and analysis to be conducted and agreed by each authority through its governance procedures.
- Measures should be put in place to avoid an instance where proper planning for housing land in a single HMA straddling multiple authorities becomes a race to the finish, whereby the last authority to publish its LDP is left holding a requirement to meet the remainder of the housing land requirement.
- The role of functional market area considerations in decision making within LDP examinations and planning decisions needs to be clarified. The Scottish Government should provide relevant guidance.

- Clarity is required around how delivery and supply are monitored and then how such information is utilised within decision making. A national HLA on a digital platform would assist in this regard.
- Any approach must not result in a single local or planning authority area having to provide a burdensome level of resources to support the process.

Finally, it was seen as important that sufficient infrastructure is available or capable of being made available to support housing development and its delivery. It was suggested that a joined-up approach is required to infrastructure delivery and meeting expectations and a concern was raised that the reference in the 2019 Act to an infrastructure levy is considerably weakened by the inclusion of a 'sunset' clause which removes the regulation making power if no regulations are made within seven years of the Act.

Should NPF apply a level of flexibility to the HNDA tool results to ensure a proactive approach to managing the supply of land for housing in a positive way? Should the level of flexibility be informed by recent housing completions?

While some respondents agreed that NPF should apply a level of flexibility to the HNDA Tool results, as under the guiding principles, others commented that they were not clear as to what was meant by 'flexibility' in this context and how it relates to the currently used 'generosity'.

Clarification was sought as to whether 'flexibility' is effectively the same as the generosity allowance which is currently set at 10-20% in SPP, and that the 'minimum housing land figure' is the equivalent of the current housing land requirement. It was also reported that as section 75 regulations only stipulate a 25% contribution to social housing it is difficult to see how the backlog can be cleared through NPF forecasts alone.

There was also a query as to whether flexibility would be around a standard figure across all authorities or varied according to circumstance, and if varied, on what evidence would the rate be based.

One perspective was that the addition of a flexible percentage to the strategic housing target represents an essential safeguard. It was suggested that this should ensure that the development plan could maintain the minimum five-year effective land supply at all times. It was also suggested that the current range of between 10-20% of the strategic housing target seems to be arbitrarily fixed and unrelated to the potential performance of the LDP.

There was a call for a form of ambition bias, with the ability to flex targets upwards only, ensuring delivery targets exceed the base need and demand uncovered through evidence gathering. An alternative perspective was that an approach that allows for flexibility would defeat the purpose of having prepared an HNDA, introduce the prospect of challenge and remove certainty for communities.

Other concerns raised included that the proposed approach introduces the potential for flexibility at the wrong stage - the view was that HNDA outputs should inform an

LDP-related policy decision on the number of new homes the planning authority reasonably expects could be delivered. Another alternative proposed was that the level of flexibility should not be set within NPF4 but following a full HNDA and consideration of local factors including past completions, market conditions and the growth aspirations of the local authority. The level of flexibility could be considered through the gatecheck process in the preparation of the LDP.

It was also suggested that the inclusion of two separate targets (housing supply and housing land requirement) leads to confusion and that, should a target be required, then a single figure produced with local knowledge and subject to less dispute would provide greater clarity for both developers and planning authorities. It was also suggested that some flexibility could be included to allow for extra capacity in addition to that single number, but that it should be represented as an accepted percentage point departure from the same figure and not a separate, defined figure in its own right.

It was also seen as important that NPF should not seek to artificially inflate the supply of land for housing other than to incorporate flexibility to allow for sites failing to come forward or delivering more slowly than programmed, as is currently the case between housing supply targets and housing land requirements. It was reported that many parts of the country are still struggling to see a return to pre-recession completions and that requiring planning authorities to allocate more land to ensure additional flexibility will not necessarily mean that more homes are delivered. Further, delivery on the ground is not something which planning authorities can control on the majority of sites and simply allocating more land could potentially have a detrimental impact on the delivery of other priorities, such as urban regeneration and the reuse of brownfield sites, as developers will understandably opt to concentrate on the less complex greenfield sites first.

Also in relation to how flexibility can or should be exercised, it was suggested that there should be:

- Clarity around the factors that will be considered when any adjustments are made.
- A robust methodology and consistency across Scotland and that this could equate to a flat rate of generosity, making housing land calculations easier to defend during the proposed gatecheck process.
- Recent housing completions.

In relation to whether flexibility should be informed by recent housing completions, comments included that:

- An approach based on past completions will be able to reflect variations in delivery at market area geography and by tenure. In arriving at a locally agreed view, consideration could be given to completions using measures including for example an average of a five- or ten-year period.
- They can be a useful indicator of what can be delivered but should be treated in the same way as the HNDA Tool outputs and must be subject to considerations on environmental, social and economic factors.

- Any flexibility could be informed by the track record of the planning authority in delivering new homes against its (current system) housing supply target and/or against identified need and demand.

However, concerns were also raised about the use of recent house completions data, including that in an area with a constrained housing market, recent completions may be low, masking unmet demand. Peaks and troughs in development activity may occur for a variety of reasons.

An alternative perspective was that such an approach would effectively reward failure since a planning authority that under-delivered in the past would 'enjoy' lower requirements in the future and associated short-term political gain, regardless of implications in terms of actual housing need.

Should NPF housing land figures be met in LDPs as a minimum?

Comments from respondents who thought that NPF housing land figures should be a minimum included that this approach would continue the approach set out in the current SPP at paragraph 116, that plans should indicate the number of new homes to be built over the plan period, and that this should be increased by a margin of 10-20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided.

In terms of taking forward an approach based on a minimum figure, it was suggested that each LDP should have clear approaches in place to effectively and quickly address any housing delivery shortfall that may arise if some of the preferred sites do not deliver homes as anticipated.

Issues raised by those who did not support the approach included that a key tenet set out at the start of the reforms to the planning system was to improve the participation of communities and subsequently increase public trust in the system. The local authority respondent raising this issue went on to suggest that the imposition within the NPF of minimum targets without accessible and rigorous consultation with communities is likely to further degrade their trust in the planning process.

It was also suggested that setting a minimum figure would put too many restrictions on authorities as there should be room for recognising local knowledge and understanding. There were additional concerns that if the minimum figures set out in NPF4 are unattainable (particularly in areas of low demand) then this will leave authorities exposed to development in unsuitable locations/areas.

One view was that, in order to attain the simplicity sought, the Scottish Government should remove the scope for minimums, flexibility and debate whilst taking a simpler approach based on locally agreed knowledge and average completions. An associated comment was that if LDPs are required to meet housing figures, there should be a specific requirement on the housing industry to meet these targets over the lifespan of the LDP and any under-delivery of these houses should be ignored at LDP gatechecks and examinations.

LDPs are moving to a ten-year timeframe. Housing land audits generally programme land supply for a five-year period. For LDPs to have a ten-year land supply available upon adoption what mechanisms could be used to ensure land is brought forward in accordance with the LDPs spatial strategy?

Broader issues raised included that there is currently no legislation that ties housing to planning, and the Scottish Government therefore needs to examine how legislation can be aligned. It was also suggested that to ensure land is brought forward in accordance with the LDP's spatial strategy, there is potential for much closer alignment between the HLA process and delivery programmes to help confirm site effectiveness and programme investments.

There was also a call for modifications to the HLA procedure to be introduced as a matter of urgency. It was suggested that annual audits have a tendency to overestimate rather than underestimate the available effective land supply, including because of the inclusion of anticipated annual completions from sites that have no planning consent. As an example, it was reported that one 2013 HLA contained 20 sites which were 'allocated' but did not have planning consent and that the total contribution from these sites to the forward five year effective land supply was equivalent to 30% of the overall effective land supply identified in the audit. Further, the 2018 HLA revealed that these 20 sites had only delivered 1,103 houses in the previous five years, as opposed to the 3,327 anticipated.

Other comments included that:

- The requirement to maintain a five-year effective housing land supply, and how it is calculated, needs to be reviewed as it continues to be a source of confusion in the system, and the way it is applied is undermining the plan-led system.
- The five-year effective period is an important consideration as maintaining a five-year supply is currently a trigger for paragraphs 32 and 33 of SPP.

Clarity was sought around whether there will be a requirement going forward to maintain a five-year effective supply and on the approach to housing shortfall.

It was also suggested that it is unrealistic to allocate housing land and provide effective supply for a decade-long period. Further, that whilst LDPs can identify sites for delivery in years one to five and safeguarded for deliver in years five to ten, it will be extremely challenging to have an effective ten-year supply identified in an LDP at the outset, as there is so much uncertainty with delivery. Reasons given included that, with the validity of forecasting over the five-year period or longer reported to be low, the usefulness of creating a ten-year supply is questionable.

In addition to the suggestion that significant new allocations of deliverable land will need to be added to LDPs, ideas concerning how a ten year-related supply could operate included that:

- NPF4 should define how land supply might be managed over a ten-year period within an LDP and should include circumstances that might trigger a review of land supply and alignment with LHSs, for example, to determine whether more land may require to be released.

- At least 80% of allocated sites should be effective at the point of being allocated in an LDP. The remaining 20% must be able to address six of the seven tests of effectiveness within Planning Advice Note 2/2010: Affordable Housing and Housing Land Supply.
- There would need to be an acceptance that sites that are not currently effective but would expect to be effective within the ten-year period would be included.
- The non-effective supply should be capable of becoming effective within the ten-year plan period but where there are constraints to be overcome these should be set out, monitored and updated in the LDP Action Programme.
- Local authorities should be encouraged to allocate a buffer of safeguarded land above their NPF requirement, to account for slippage and ensure the minimum requirement is met.
- Where a planning authority proposed to rely on windfall development to make up a proportion of its housing land supply, there should be a reasonable prospect of windfall sites coming forward. Any assumptions must be supported by compelling evidence that they are justifiable and will lead to the necessary delivery of homes.

Other comments also addressed the relationship between five- and ten-year cycles. For example, it was reported that even though LDPs are reviewed every five years currently, they should allocate sufficient housing land for a ten-year period. It was suggested that when the preparation of LDPs moves to a ten-year cycle, authorities will be able to produce an update of the LDP, and in many cases this would likely be to update the housing land supply. It was also suggested that:

- The Scottish Government should provide clear guidance on how the five-year housing land supply should be calculated. It should include that if a shortfall develops, immediate action should be taken, and additional land released.
- Failure to have met the housing supply target of the preceding five-year period should always result in the shortfall being carried forward for the subsequent five-year period to ensure the housing requirement is met.
- NPF should set out policy that would allow planning permission to be granted for sustainable development of non-allocated sites. Where a planning authority cannot demonstrate a five-year supply there must be a strong presumption in favour of granting planning permission for sustainable development on unallocated sites to address the shortfall.

Suggestions as to other mechanisms to ensure land is brought forward included that:

- A range of agencies should be required to co-operate and invest time and funds for a minimum period of time. Such an approach should be focused on bringing forward vacant or derelict or underused urban brownfield sites.
- In areas of high demand, any approach needs to ensure there is a gradual improvement of local services to accommodate an increased population. A mechanism that prioritises the release of land not previously identified would, however, be counterproductive and would negate the plan-led approach.

- A single template for HLAs should be provided for all planning authorities to use and this should feed into an online database that can be readily accessed and used to monitor completions and deliverable land in each planning authority, in each region, and across Scotland as a whole.
- Sites that are currently thought to be deliverable should be programmed out, at a locally achievable rate that the market is capable of absorbing, from the year the home builder attached to the site (or another developer) demonstrates the completion of new homes will begin.
- Annual delivery must be robustly monitored and reviewed through the annual HLA. Verification should be provided by the Scottish Government, to ensure the housing supply target is verified and the housing land supply remains effective.

Should the Scottish Government play a role in the housing land audit process?

One view was that the HLA process should be standardised and prescribed by the Scottish Government, to include a fixed template and possibly a sign off procedure to ensure absolute consistency across Scotland.

An alternative view was that the HLA should remain a matter for local authorities as they have direct knowledge and understanding of how the local housing markets operate. However, it was reported that the failure to agree the annual audit within an appropriate timescale with Homes for Scotland can be a drawback and that consideration should be given to setting defined timescales for all parties involved in this process.

Other comments included that, in order to ensure consistency and compatibility in assumptions and methodology for data collection across Scottish local authorities, the Scottish Government should be involved to some extent. Comments sometimes addressed when or how the Scottish Government should be involved with variations proposed including that they:

- Should take forward Recommendation 13 of the report of the Independent Review of the Planning System in 2016 and establish a clearer definition and policy context for how housing land and housing delivery are measured and dealt with.
- Should play an important role in setting out the remit and requirements of the HLA and additional guidance on the HLA process would be welcomed. One suggestion was this should equate to ensuring a reliable, annual, genuinely agreed audit is carried out for each planning authority and then acting to ensure the content of an audit can be properly interpreted and, where necessary, acted upon.
- Could be represented in HLA meetings to ensure that they are aware of emerging issues.
- Would have greatest impact by playing an enhanced role at gatecheck and examination stages.
- Could consider becoming involved where there are disputes in the audit between the local authority and the development industry.

- Should use new powers to ensure LDPs with inadequate housing land supplies cannot be adopted.
- Should have a monitoring role.

Finally, there was support for presenting housing land on a digital national platform, and it was suggested that the Digital Taskforce provides an opportunity to develop a digital platform that could provide clarity and reduce unnecessary debate.

National Developments

The 2019 Act allows the Scottish Ministers to identify National Developments to include in NPF4. This could include single, large-scale projects or several smaller scale developments combined. To ensure their status adds value, National Developments must have some aspect which requires permission or consent before construction begins. Once designated, the question of whether a National Development is needed does not have to be debated in later consenting processes. National Developments aim to provide certainty upfront, for investors, businesses, and also communities.

As part of the Call for Ideas, the Scottish Government invited suggestions for projects to be considered for National Development status in the draft NPF4. A factsheet, invitation and response form were provided on the Scottish Government's Transforming Planning website. The response form asked eight questions about the proposed national development, including how it would contribute to meeting the National Development criteria. These relate to climate change, people, inclusive growth and place.

The Scottish Government is undertaking the analysis of individual national development proposals received through the Call for Ideas. This section is not designed to replicate that analysis but to give an overview of the type of proposals submitted.

Scale and type of responses

A wide range of respondents made national development-related comments or suggestions. However, it was not always clear whether respondents were making or supporting a specific National Development proposal or were making more general suggestions relating to policy or funding priorities.

Responses varied significantly in terms of format and level of detail provided from a very brief description (name or single sentence only), through to detailed, business plan style proposals.

Around half the proposals were submitted with a completed National Development response form. Other responses were made expressly as National Development proposals but not accompanied by a response form and some suggestions were made within wider comments made in response to the Call for Ideas. The Scottish Government is analysing over 200 National Development proposals.

Overview of suggestions

The National Development suggestions made were diverse in type, scale and coverage. For example, they included suggestions for:

- Sustainable energy related projects, including relating to renewable electricity generation and transmission, hydrogen networks, heat capture and heat networks.
- A Carbon Capture Utilisation and Storage Network.

- Flood protection or water management schemes or projects.
- Major transport and facilities-related projects, including in relation to port, harbour, rail, air or road infrastructure.
- Active travel networks or infrastructure and/or infrastructure to encourage multi-method travel and the decarbonising of transport.
- Regional or national green or nature networks.
- National or regional parks or ecoparks.
- Tourism-related projects, including gateways or specific facilities.
- A National Digital Fibre Network or improvements to digital infrastructure.
- Targets for housing, affordable homes or specific residential or mixed-use developments.
- Area, town or site focused regeneration and transformation projects, including for former major industrial or infrastructure sites.
- Economic development, innovation or research and development zones, areas or parks.
- A Space Port or Hub.

Current national developments

NPF3 set out 14 National Developments: Ravenscraig; Dundee Waterfront; Carbon Capture and Storage Network and Thermal Generation; High Voltage Electricity Transmission Network; Pumped Hydroelectric Storage; Central Scotland Green Network; Metropolitan Glasgow Strategic Drainage Partnership; National Long Distance Cycling and Walking Network; High Speed Rail; Strategic Airport Enhancements; Grangemouth Investment Zone; Freight Handling Capacity on the Forth; Aberdeen Harbour; and National Digital Fibre Network.

A number of the National Development-related comments were effectively a statement of support for the continuation of one or more of these National Developments. This applied particularly to the Central Scotland Green Network, Carbon Capture and Storage and Thermal Generation and High Voltage Electricity Network. There were also references to a number of the other existing National Developments.

Some respondents commented that specific current National Developments, or elements of them, should not continue as National Developments in NPF4.

Integrated Impact Assessment

The IIA Screening/Scoping Report accompanying the Call for Ideas noted that a range of statutory and non-statutory assessments will inform the preparation of NPF4. The intention is to reach clear findings for each of the assessments, with a summary narrative that sets out key findings under the impact assessment themes of: Environment; Society and Equalities; and Economy.

- **Environment Theme:** this will include an SEA (including consideration of the likely health effects of National Developments), Habitats Regulations Appraisal, and a consideration of the life-cycle greenhouse gas emissions of National Developments.
- **Society and Equalities Theme:** this will include an Equality Impact Assessment, Child Rights and Wellbeing Impact Assessment, Island Communities Impact Assessment, and will have due regard to issues arising pertaining to Human Rights matters and through the Fairer Scotland Duty within the NPF4 preparation process. There will also be consideration of any data protection issues arising.
- **Economy Theme:** this will include a Business and Regulatory Impact Assessment to assess the likely costs, benefits and risks of any proposed policy changes that may have an impact on the public, private or third sector.

Although only a small number of respondents made IIA-related comments, these comments were sometimes very detailed. The analysis presented here gives a summary overview of key issues raised.

Overall approach

General comments included those offering support for the proposal to integrate reporting on the various assessments required for NPF4, including by providing a summary narrative which will draw together cross-cutting issues from the various assessments.

Environment

Strategic Environmental Assessment

There was support for the proposed approach of setting out the SEA in a narrative style with tables/matrices and mapping. Related suggestions included that the presentation of findings should identify opportunities as well as constraints and that this could be done in narrative and/or map form. It was suggested that looking for opportunities rather than just constraints will also help with identifying the interrelationships between environmental topic areas more fully.

Scoring

On a similar theme, there was a view that the wording of previous impact assessment questions often seems to lead the reader to look for negative impacts or features and to overlook positive impacts and features. It was suggested that the

scoring system (as set out at 3.1.12 of the Screening/Scoping Report⁴⁴) and some of the language used in the accompanying table (Table 2 of the Screening/Scoping Report) has an inherent negative bias. It was noted that some developments can enhance habitats and species and that any unintentional bias in the assessment methods and scoring systems should be removed.

Another proposal was that a score for unknown impacts should be included. This was seen as important to ensure that uncertainty around effects is recorded, and the level of overall uncertainty gauged. It was suggested that this will help inform discussion around reasonable alternatives, for example considering whether a slightly different course of action could result in a positive outcome or a more clearly defined environmental outcome.

Mitigation and enhancement opportunities

It was suggested that if 'no impact' is recorded, the potential to turn this into a positive outcome by considering a different course of action should be investigated. This was seen as particularly relevant to consideration of opportunities to deliver against existing environmental objectives which are designed to address historic environmental pollution or degradation (as identified in paragraph 3.1.7 of the Screening/Scoping Report).

Possible additions

In terms of possible additions or changes to the SEA:

- There was support for the assessment of the likely health effects for National or major developments. It was suggested that this requirement could also be extended to include an assessment of the impact of developments on wellbeing.
- It was suggested that there are many more inter-related aspects which could be picked up, such as the historic environment and geodiversity and the historic environment and material assets. An example given was that the Example Objective given under the Materials Assets topic (presented at Table 2 of the Screening/Scoping Report) could be expanded to read '*Reduce use and promote sustainable management of natural resources and heritage assets.*'
- The relevant environmental objectives (in section 3.1.7 of the Screening/Scoping Report) could make mention of specific Soil and Geodiversity objectives.
- Adaptive flood risk management could be considered as part of the objective proposed for flood risk.

Habitats Regulations Appraisal

Comments about the Habitats Regulations Appraisal included that when considering the effects of any policy change that relates to solar PV, the Scottish Government should make reference to the very latest scientific evidence, for

⁴⁴ Available at: <https://www.transformingplanning.scot/media/1293/national-planning-framework-4-integrated-impact-assessment-scoping-report.pdf>

instance as catalogued by Lancaster University, on the ecosystem effects of solar PV.

Environment Baseline Information

Although there was a view that a lot of good information is presented in the Environment Baseline Information, it was felt that it is not always clear how this will inform the assessment of the effects from the policies and proposals in NPF4. In particular, it was suggested that it would be helpful to include references to the sources of information used to draw conclusions.

Other comments or queries regarding the information set out in *Appendix A: Environment Baseline Information*⁴⁵ included that:

- Biodiversity, Flora and Fauna (section 1.2) refers to 2009 data which has now been superseded. The *State of Nature Scotland Report 2019*⁴⁶ provides a more up-to-date assessment for habitats and species, including those outwith protected sites.
- Climate Factors (section 1.4) could helpfully reference the Scottish Government Scottish Climate Change Adaptation Programme.
- Soils (section 1.7) should recognise and protect soil as a natural capital asset in its own right. One of the key pressures on soils is change in land use and land management practice which is likely to be a key component of NPF4 – however Table 2 does not mention this in its summary of key pressures. The Soils section should include Soil risk maps, the Soil map of Scotland and National soil map of Scotland - all data sources are available on the Scotland Soil Website.⁴⁷
- Cultural Heritage and Historic Environment (section 1.8) presents figures on Scotland's *Historic Environment in Numbers* but their source is not clear. It was suggested that the most recent figures from Scotland's Historic Environment Audit should be used instead. The section should be also amended to note that Scotland's historic environment resonates internationally and nationally as well as being culturally important to local communities.
- Landscape and Geodiversity (section 1.9) could be adjusted to ensure that the importance of all landscapes are acknowledged as per the European Landscape Convention.
- Material Assets (section 1.10) makes no mention of infrastructure. The Scoping Report also appears to lack consideration of key pressures associated with existing infrastructure, for example in relation to energy generation and transmission, transport, or water treatment and supply.

⁴⁵ Available at: <https://www.transformingplanning.scot/media/1294/national-planning-framework-4-integrated-impact-assessment-scoping-report-appendix-a-environment-baseline-information.pdf>

⁴⁶ Available at: <https://www.nature.scot/state-nature-scotland-report-2019>

⁴⁷ See <https://soils.environment.gov.scot/resources/peatland-restoration/>

Timescales

One respondent noted the proposal to run a public consultation on the IIAs and draft NPF4 in parallel with the 120-day parliamentary consideration of the draft NPF4. They were content with this plan.

Also with reference to timescales, the impact of the COVID-19 was noted and there was a query as to whether the extension of the Call for Ideas period (to 30 April 2020), is expected to have any knock-on effects on timescales for the preparation of the plan and the accompanying IIA. A respondent who is a Consultation Authority under the Environmental Assessment (Scotland) Act 2005 noted that, for administrative purposes, they consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.

Also with reference to COVID-19, it was acknowledged that mitigation measures have disrupted the engagement programme and that, as a result, businesses and stakeholders will not have had the same opportunities to be involved. There was a call for the Scottish Government to make arrangements to hold discussions with interested stakeholders and to allow for more sharing and iterations of its drafts as they are prepared.

Society and Equalities

Including ‘improving equality and eliminating discrimination’ as a stand-alone outcome to NPF4 was welcomed, although the need at this early stage to apply an equality lens to each of the other NPF4 outcomes was also highlighted. The importance of producing a full equality impact assessment - which is both produced and published in an accessible way - prior to or when the draft NPF4 is laid before the Scottish Parliament was also raised.

A specific suggestion in terms of the accessibility of the process was that organisations such as BEMIS⁴⁸ and the Coalition for Racial Equality and Rights need to be involved and should be listed as statutory consultees at a strategic level.

In terms of the focus of the work to be undertaken, comments included that:

- The Scottish Government must pay due regard to the PSED, including specific duties, and the ‘Fairer Scotland’ socio-economic duty.
- The Scottish Government and planning authorities should use evidence-based equality impact assessments and the Fairer Scotland duty to aid their strategic thinking, outcome and priority-setting, and action planning.
- Given the long-term nature of NPF4, its impact on equalities will evolve over time and equality considerations should be subject to regular review.
- Specific, evidence-based equality outcomes which address different protected characteristic groups in relation to planning should be developed by planning authorities.

⁴⁸ BEMIS is the national umbrella body supporting the development of the Ethnic Minorities Voluntary Sector in Scotland.

- Monitoring, evaluation and compliance activities should ensure that clear equalities standards are upheld and that desired equalities outcomes are central to this process.

Protected characteristics

The need to consider the cross-cutting themes of age, disability, race, religion or belief, sex, sexual orientation, gender reassignment and socio-economic disadvantage was highlighted, and there was a call for links to be made to equality and poverty-related policies nationally, regionally and locally.

The importance of ensuring that gender equality is mainstreamed in NPF4 and all planning policy was also highlighted, as was need to identify and address the needs of children and young people, older people, and those living in areas of severe and multiple deprivation. It was also seen as important to identify those who have experienced challenges related to previous planning policy, such as Gypsy/Travellers and disabled people, and to take steps to ensure that NPF4 meets their needs.

With specific reference to Showpeople, it was reported that without any legal status as an ethnic community, this community has not been given any consideration in past NPFs and it was noted that the Screening/Scoping Report and the Society and Equalities baseline information only references Gypsy/Travellers, leaving the Scottish Showpeople community excluded from any conversation at an early stage. It was suggested that the Scottish Showmen's Guild and other members of the community could be involved in a workshop for Showpeople.

Other suggestions in terms of taking the equalities elements of the IIA and NPF4 overall forward included that:

- Proposals should be informed by those with lived experience, including old and young people, children, disabled people, women, minority ethnic groups, religious groups and people with experience of living in poverty.
- Using population segmentation to identify requirements for different protected characteristics and vulnerable populations could be helpful. Some of this is already captured in the IIA but it needs to feed through to NPF4, particularly as there will be greater issues around poverty and disadvantage stemming from the COVID-19 pandemic.
- The cultural sector can be a vehicle to improve understanding and raise awareness in communities of equalities issues.

Island Communities Impact Assessment

The importance of ensuring that NPF4 is properly island and remote rural proofed was noted.

The Scottish Government's recognition of the particular planning-related challenges and opportunities arising from the special circumstances of island communities was welcomed. The preparation of an Island Communities Impact Assessment to accompany the 2019 Act was seen as a very valuable exercise, including because it contained recommendations which will assist in the development of NPF4.

In the drafting of NPF4, there was a call for the Scottish Government to continue to take the unique character and setting of island authorities into consideration, including by 'islands proofing' NPF4.

Annex 1: Organisational respondents published under their name on the Transform Planning website

Active travel-related third sector organisation or campaign group
Cycle Stirling
Cycling Scotland
Living Streets Scotland
Paths for All
Ramblers Scotland, Transform Scotland, Cycling UK Scotland
Spokes – The Lothian Cycling Campaign
Sustrans Scotland
City Region or Strategic Development Planning Authority
Clydeplan
Edinburgh and South East Scotland City Region Deal
Glasgow City Region
Community Council or Residents Association
Cluny, Midmar & Monymusk Community Council
Cockenzie and Port Seton Community Council
Cramond and Barnton Community Council
Durness Community Council
Jackton & Thorntonhall Community Council
Linlithgow and Linlithgow Bridge Community Council
Mains Estate Residents' Association
Prestonpans Community Council
Queens Cross Harlaw Community Council
Royal Burgh of Forfar Community Council
Royal Burgh of Kinghorn Community Council
Symington Community Council
Tillicoultry Coalsnaughton and Devonside Community Council
Culture or Heritage Company, Association or Representative Body
Association of Local Government Archaeological Officers
Chartered Institute for Archaeologists
Culture Counts
Edinburgh International Festival
Federation of Archaeological Managers and Employers

Culture or Heritage Company, Association or Representative Body (continued)
Institute of Historic Building Conservation Scotland Branch
Theatres Trust
Development, Property or Land Management Company or Representative Body
Alfred Stewart Property Foundation Ltd
Bandeath Holdings Ltd
Bidwells
Cape Marco Ltd
Clyde Gateway URC
Crosswind Developments Ltd
Gladman Developments Ltd
Green Town (Heartlands) Ltd
Highloch Limited
Homes for Scotland
Mactaggart and Mickel
New City Vision Limited
NPL Group
Orchard Brae Ltd – Europark
Persimmon Homes
Ravenscraig Limited
Retirement Housing Group UK
Savills UK Limited
Scottish Property Federation
Shawfair LDP
Swanton Farm Ltd
Taylor Wimpey
Taylor Wimpey and Hallam Land Ltd
Wallace Land Investments
Wildland Limited
Winchburgh Developments Limited
Energy-related Supplier, Developer, Association or Body
Alcemi Storage Developments Ltd
Banks Group
Coriolis Energy Ltd
Drax Group

Energy-related Supplier, Developer, Association or Body (continued)
Energy UK
Ennoviga Solar Ltd
GFG Alliance
Halliburton Manufacturing and Services Limited
Innogy Renewables UK Ltd
Innovatus Technologies Ltd
Inverurie Community Energy Society Limited
Mainstream Renewable Power
Mobile UK
Muirhall Energy
Oil & Gas Technology Centre
Opportunity North East Ltd
Red Rock Power Limited
Renewable Energy Systems
Scottish and Southern Electricity Networks
Scottish Carbon Capture & Storage
Scottish Hydrogen & Fuel Cell Association
Scottish Power Energy Networks
Scottish Power Renewables
Scottish Renewables
SGN
Solar Trade Association
SSE Thermal
Statkraft UK Ltd
TWEFDA Ltd
WKN GmbH
Environment or Natural Heritage-related Third Sector Organisation or Campaign Group
Aberdeen Climate Action CIC
Association for the Protection of Rural Scotland
Badenoch & Strathspey Conservation Group
Central Scotland Green Network Trust
Fife Communities Climate Action Network
Friends of the Earth Falkirk
Friends of the Earth Scotland

Environment or Natural Heritage-related Third Sector Organisation or Campaign Group (continued)
Galloway and Southern Ayrshire Biosphere
Galloway National Park Association
Glasgow & Clyde Valley Green Network Partnership
Greener Melrose
Greenspace Scotland
John Muir Trust
North East Mountain Trust
Reforestation Scotland's Thousand Huts campaign
RSPB Scotland
Scottish Campaign for National Parks
Scottish Environment LINK
Scottish Wildlife Trust
Woodland Trust Scotland
Greenbelt Campaign Group
APRS Green Belts Alliance
Edinburgh and Lothians Greenbelt Network
Save Steps Greenbelt Campaign Committee
Local Authority
Aberdeen City Council
Aberdeen City Council, Aberdeen Harbour, Opportunity North East and Invest Aberdeen
Aberdeenshire Council
Aberdeenshire Council Environmental Health
Angus Council
City of Edinburgh Council
Clackmannanshire Council
Comhairle nan Eilean Siar
Dumfries and Galloway Council
Dundee City Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
Falkirk Council
Fife Council
Glasgow City Council

Local Authority (continued)
Highland Council
Improvement Service
Inverclyde Council
Midlothian Council
Moray Council
North Ayrshire Council
North Lanarkshire Council
Orkney Islands Council
Orkney Islands Council Marine Services
Perth & Kinross Council
Renfrewshire Council
Scottish Borders Council
South Ayrshire Council
South Lanarkshire Council
Stirling Council
West Dunbartonshire Council
West Lothian Council
Planning, Architecture or Housing Representative Body or Campaign Organisation
Heads of Planning Scotland
PAS
Planning Democracy
Royal Incorporation of Architects in Scotland
Royal Town Planning Institute Scotland
Rural Housing Scotland
Scotland's Landscape Alliance
Scottish Planning Consultants' Forum
Planning, Development, Architectural or Environmental Consultancy
Case Consulting Limited
David Bell Planning Ltd
Environmental Resources Management Limited
Lichfields
Planning, Development, Architectural or Environmental Consultancy (continued)
Stantec
Voigt Architects Limited

Public Body, Commission or Taskforce
Architecture and Design Scotland
Crown Estate Scotland
Equality and Human Rights Commission
Highlands and Islands Enterprise
Historic Environment Scotland
Key Agency Planning Group
Public Health Scotland
Scottish Enterprise
Scottish Environment Protection Agency
Scottish Land Commission
Scottish Natural Heritage
Vacant and Derelict Land Taskforce
Zero Waste Scotland
Third sector, community or campaign organisation
A Place in Childhood
British Horse Society Scotland
Buchan Development Partnership
Carnegie UK Trust
Community Growing Forum Scotland
Dundee Civic Trust
Edinburgh Airport Noise Advisory Board
Engender
Fife Community Activists
Glasgow Allotments Forum
Glasgow National Park City Group
Obesity Action Scotland
Observatory for Sport in Scotland
Scottish Flood Forum
Scottish Mediation
Scottish Obesity Alliance
Stirling Area Access Panel
Transport Partnership
HITRANS
Nestrans

Transport Partnership (continued)
South East of Scotland Transport Partnership
SWestrans
Transport-related Body, Association or Provider
Aberdeen Harbour Board
Ardersier Port Ltd
British Ports Association
Clydeport Operations Ltd
CoMoUK
Forth Ports Ltd
Glasgow Airport
Inverness Harbour Trust
Network Rail Infrastructure Limited
Peter D Stirling Ltd
Rail Freight Group and Transform Scotland
Transform Scotland
Other Infrastructure-related Company or Representative Body
Arqiva Ltd
Metropolitan Glasgow Strategic Development Partnership
Scottish Environmental Services Association
Scottish Water
Other Private Sector
Bourne Leisure
Place Store
Tiny House Scotland
Aldi Stores Ltd
McMillan Consultancy Ltd
Other Representative Body, Faculty, Network or Academic Group
Academy of Urbanism
Association of Environmental Clerks of Works
Chartered Institute of Ecology and Environmental Management
Committee of the Faculty of Public Health in Scotland
Health and Place Working Group
Landscape Institute Scotland
Scottish Health and Inequalities Impact Assessment Network



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